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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3 and Unit 4
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load
Item 2.5.01.02c.i [Index Number 508]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of June 21, 2017, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses and Acceptance Criteria (ITAAC) Item 2.5.01.02c.i [Index Number 508] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.5.01.02c.i [Index Number 508]. Southern Nuclear Operating Company will, at a later date, provide additional notifications for ITAAC that have not been completed 225-days prior to initial fuel load.

This notification is informed by the guidance described in NEI-08-01, *Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52,* which was endorsed by the NRC in Regulatory Guide 1.215. In accordance with NEI 08-01, this notification includes ITAAC for which required inspections, tests, or analyses have not been performed or have been only partially completed. All ITAAC will be fully completed and all Section 52.99(c)(3) ITAAC Closure Notifications will be submitted to NRC to support the Commission finding that all acceptance criteria are met prior to plant operation, as required by 10 CFR 52.103(g).

This letter contains no new NRC regulatory commitments.

If there are any questions, please contact David Woods at 706-848-6903.

Respectfully submitted,

Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.5.01.02c.i [Index Number 508]

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Southern Nuclear Operating Company
ND-17-1140
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.5.01.02c.i [Index Number 508]

ITAAC Statement

Design Commitment

2.c) The DAS provides manual initiation of reactor trip, and selected functions, as identified in Table 2.5.1-2, separate from the PMS. These manual initiation functions are implemented in a manner that bypasses the control room multiplexers, if any; the PMS cabinets; and the signal processing equipment of the DAS.

Inspections/Tests/Analyses

Electrical power to the control room multiplexers, if any, and PMS equipment will be disconnected and the outputs from the DAS signal processing equipment will be disabled. While in this configuration, an operational test of the as-built system will be performed using the DAS manual actuation controls.

Acceptance Criteria

i) The generator field control relays (contained in the control cabinets for the rod drive motor-generator sets) open after reactor and turbine trip manual initiation controls are actuated.

ITAAC Completion Description

Multiple ITAAC are performed to verify that the Diverse Actuation System (DAS) provides manual initiation of reactor trip and selected functions, as identified in Combined License (COL) Appendix C Table 2.5.1-2 (Attachment A), separate from the Protection and Safety Monitoring System (PMS). The subject ITAAC verifies the generator field control relays open after a reactor and turbine trip manual initiation using DAS controls.

Testing is performed in accordance with the Unit 3 and Unit 4 preoperational test procedures SV3-DAS-T1P-501 and SV4-DAS-T1P-501 (Reference1 and 2, respectively) to verify that the as-built DAS provides manual initiation of reactor and turbine trip, separate from the PMS. The test procedure de-energizes the PMS cabinet power supplies (no multiplexer exists) and blocks DAS automatic input signals and prevents DAS automatic output actuation by placing DAS in Master Test. Initial conditions are verified and testing is performed by manually actuating the DAS manual functions to trip the reactor and turbine. During the manual reactor and turbine trip, the generator field control relays are verified to open locally by inspection at the motor generator set control cabinets.

The reports documenting the Unit 3 and Unit 4 preoperational test results, SV3-DAS-T2R-501 and SV4-DAS-T2R-501 (References 3 and 4, respectively), confirm that the generator field control relays (contained in the control cabinets for the rod drive motor-generator sets) open after reactor and turbine trip manual initiation controls are actuated.

References 1, 2, 3 and 4 are available for NRC inspection as part of the ITAAC 2.5.01.02c.i Completion Package (References 5).

List of ITAAC Findings

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

References (available for NRC inspection)

1. SV3-DAS-T1P-501, "Diverse Actuation System Preoperational Test Procedure"
2. SV4-DAS-T1P-501, "Diverse Actuation System Preoperational Test Procedure"
3. SV3-DAS-T2R-501, "Diverse Actuation System Preoperational Test Results Report"
4. SV4-DAS-T2R-501, "Diverse Actuation System Preoperational Test Results Report"
5. ITAAC 2.5.01.02c.i Completion Package
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

Excerpt from COL Appendix C Table 2.5.1-2

Table 2.5.1-2 **Functions Manually Actuated by the DAS**
1. Reactor and Turbine Trip