

**JUN 30 2017**Docket Nos.: 52-025  
52-026ND-17-1136  
10 CFR 52.99(c)(3)U.S. Nuclear Regulatory Commission  
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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 2.2.03.08c.i.02 [Index Number 178]

Ladies and Gentlemen:

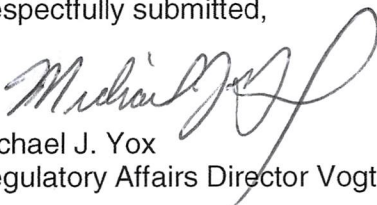
Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of June 21, 2017, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.03.08c.i.02 [Index Number 178] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.2.03.08c.i.02 [Index Number 178]. 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

U.S. Nuclear Regulatory Commission  
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Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.2.03.08c.i.02 [Index Number 178]

MJY/KJD/amw

**To:**

**Southern Nuclear Operating Company/ Georgia Power Company**

Mr. D. A. Bost (w/o enclosures)  
Mr. M. D. Rauckhorst (w/o enclosures)  
Mr. M. D. Meier  
Mr. D. H. Jones (w/o enclosures)  
Mr. D. L. McKinney  
Mr. M. J. Yox  
Mr. D. L. Fulton  
Mr. J. D. Williams  
Mr. D. F. Woods  
Mr. F. H. Willis  
Ms. A. L. Pugh  
Mr. A. S. Parton  
Mr. W. A. Sparkman  
Mr. C. E. Morrow  
Ms. K. M. Stacy  
Mr. J. P. Redd  
Ms. A. C. Chamberlain  
Mr. D. R. Culver  
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cc:

**Nuclear Regulatory Commission**

Mr. W. Jones (w/o enclosures)  
Ms. J. M. Heisserer  
Mr. C. P. Patel  
Mr. M. E. Ernestes  
Mr. G. J. Khouri  
Mr. T. E. Chandler  
Ms. S. E. Temple  
Ms. P. Braxton  
Mr. T. C. Brimfield  
Mr. A. J. Lerch  
Mr. C. J. Even  
Ms. V. L. Ordaz  
Mr. B. J. Davis

**Oglethorpe Power Corporation**

Mr. K. T. Haynes  
Mr. R. B. Brinkman

**Municipal Electric Authority of Georgia**

Mr. J. E. Fuller  
Mr. S. M. Jackson

**Dalton Utilities**

Mr. T. Bundros

**WECTEC**

Mr. C. A. Castell

**Westinghouse Electric Company, LLC**

Mr. R. Easterling (w/o enclosures)

Mr. G. Koucheravy (w/o enclosures)

Mr. D. C. Durham (w/o enclosures)

Ms. K. B. Chesko

Mr. J. Hopkins

Mr. D. Hawkins

Mr. C. F. Landon

Mr. M. L. Clyde

Ms. S. DiTommaso

Mr. A. F. Dohse

**Other**

Mr. J. E. Hesler, *Bechtel Power Corporation*

Ms. L. Matis, *Tetra Tech NUS, Inc.*

Dr. W. R. Jacobs, Jr., Ph.D., *GDS Associates, Inc.*

Mr. S. Roetger, *Georgia Public Service Commission*

Ms. S. W. Kernizan, *Georgia Public Service Commission*

Mr. K. C. Greene, *Troutman Sanders*

Mr. S. Blanton, *Balch Bingham*

Mr. R. R. Newton, *SCANA*

**Southern Nuclear Operating Company  
ND-17-1136  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.2.03.08c.i.02 [Index Number 178]**

## **ITAAC Statement**

### **Design Commitment**

8.c) The PXS provides RCS makeup, boration, and safety injection during design basis events.

### **Inspections/Tests/Analyses**

i) A low-pressure injection test and analysis for each CMT, each accumulator, each IRWST injection line, and each containment recirculation line will be conducted. Each test is initiated by opening isolation valve(s) in the line being tested. Test fixtures may be used to simulate squib valves.

#### 2. Accumulators:

Each accumulator will be partially filled with water and pressurized with nitrogen. All valves in these lines will be open during the test. Sufficient flow will be provided to fully open the check valves.

### **Acceptance Criteria**

i) The injection line flow resistance from each source is as follows:

#### 2. Accumulators:

The calculated flow resistance between each accumulator and the reactor vessel is  $\geq 1.47 \times 10^{-5}$  ft/gpm<sup>2</sup> and  $\leq 1.83 \times 10^{-5}$  ft/gpm<sup>2</sup>.

## **ITAAC Completion Description**

Multiple ITAAC are performed to verify that the Passive Core Cooling System (PXS) provides Reactor Coolant System (RCS) makeup, boration, and safety injection during design basis events. This ITAAC performs a low-pressure injection test and an analysis on the injection lines between each accumulator (PXS-MT-01A/B) and the reactor vessel to calculate the flow resistance on each line.

Performance tests are conducted in accordance with Unit 3 and Unit 4 preoperational test procedures SV3-PXS-T1P-502 and SV4-PXS-T1P-502 (References 1 and 2, respectively) to demonstrate that the flow path from each accumulator to the reactor vessel has a flow resistance  $\geq 1.47 \times 10^{-5}$  ft/gpm<sup>2</sup> and  $\leq 1.83 \times 10^{-5}$  ft/gpm<sup>2</sup>.

Each accumulator is initially filled with water while measuring the volume of water added and tank level to establish a volume versus level correlation. The test is accomplished by partially filling each accumulator with water and pressurizing with nitrogen, opening the associated accumulator discharge isolation valve, and blowing down each tank through the direct vessel injection flow path with all valves in these lines open, while measuring accumulator tank level and pressure during the test period. Sufficient flow is provided to fully open the check valves. The constant value for flow resistance is calculated based on the test duration, total head loss, and total volume change from the change in measured tank level, adjusted for measurement uncertainty, and compared to the acceptance criteria.

The Unit 3 flow resistance is calculated to be XXX ft/gpm<sup>2</sup> for the accumulator A, PXS-MT-01A, flow path and YYY ft/gpm<sup>2</sup> for the accumulator B, PXS-MT-01B, flow path. The Unit 4 flow resistance is calculated to be XXX ft/gpm<sup>2</sup> for the accumulator A, PXS-MT-01A, flow path and YYY ft/gpm<sup>2</sup> for the accumulator B, PXS-MT-01B, flow path. The Unit 3 and Unit 4 preoperational test results reports SV3-PXS-T2R-502 and SV4-PXS-T2R-502 (References 3 and 4, respectively) confirm that the calculated injection line flow resistance between each accumulator and the reactor vessel is  $\geq 1.47 \times 10^{-5}$  ft/gpm<sup>2</sup> and  $\leq 1.83 \times 10^{-5}$  ft/gpm<sup>2</sup>.

References 1, 2, 3 and 4 are available for NRC inspection as part of the ITAAC 2.2.03.08c.i.02 Completion Package (Reference 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-PXS-T1P-502, "Passive Core Cooling System Preoperational Test Procedure"
2. SV4-PXS-T1P-502, "Passive Core Cooling System Preoperational Test Procedure"
3. SV3-PXS-T2R-502, "Passive Core Cooling System Preoperational Test Results Report"
4. SV4-PXS-T2R-502, "Passive Core Cooling System Preoperational Test Results Report"
5. ITAAC 2.2.03.08c.i.02 Completion Package
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"