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10 CFR 52.99(c)(3)

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 2.6.03.04b [Index Number 602]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of October 24, 2017, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.6.03.04b [Index Number 602] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing this ITAAC. 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)(1) 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 Robert Beilke at 706-848-6884.

Respectfully submitted,

A handwritten signature in black ink that reads "Michael J. Yox".

Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4

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Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.6.03.04b [Index Number 602]

MJY/LBP/amw

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**Southern Nuclear Operating Company
ND-17-1782
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.6.03.04b [Index Number 602]**

ITAAC Statement

Design Commitment

4.b) The IDS provides electrical isolation between the non-Class 1E ac power system and the non-Class 1E lighting in the MCR.

Inspections/Tests/Analyses

Type tests, analyses, or a combination of type tests and analyses of the isolation devices will be performed.

Acceptance Criteria

A report exists and concludes that the battery chargers, regulating transformers, and isolation fuses prevent credible faults from propagating into the IDS.

ITAAC Completion Description

A combination of type testing and analyses of the isolation devices is performed to verify that the Class 1E dc and Uninterruptible Power Supply System (IDS) provides electrical isolation between the non-Class 1E ac power system and the non-Class 1E lighting in the Main Control Room (MCR). A report exists and concludes that the battery chargers, regulating transformers, and isolation fuses prevent credible faults from propagating into the IDS.

Type testing and analyses are performed on battery chargers, regulating transformers, and isolation fuses in accordance with the Institute of Electrical and Electronics Engineers (IEEE) Standard 384 (Reference 1). Short circuit and coordination analyses are performed in accordance with IEEE Standards 141 and 242 (References 2 and 3, respectively) to determine maximum credible faults, time to clear the faults, and proper isolation.

The testing and supporting analyses demonstrate that the most severe credible faults applied to the non-Class 1E side of the isolation component do not degrade the intended safety function of IDS. Type tests are performed under conditions which the non-Class 1E side of the isolation component is exposed to the calculated maximum credible fault while the Class 1E side of the isolation component is monitored for perturbations.

The results of the tests and analysis are documented in the IDS Isolation Summary and Test Report (Reference 4) and conclude the battery chargers, regulating transformers, and isolation fuses prevent credible faults from propagating into the IDS. This report is available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.6.03.04b Completion Package (References 5 and 6, respectively).

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. IEEE Standard 384, "IEEE Standard Criteria for Independence of Class 1E Equipment and Circuits, 1981"
2. IEEE Standard 141, "IEEE Recommended Practice for Electrical Power Distribution for Industrial Plants, 1993"
3. IEEE Standard 242, "IEEE Recommended Practice for Protection and Coordination of Industrial and Commercial Power Systems, 1986"
4. APP-IDS-XXX-YYY, "IDS Isolation Summary and Test Report"
5. ITAAC 2.6.03.04b Completion Package XXX
6. ITAAC 2.6.03.04b Completion Package YYY
7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"