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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 3.3.00.08 [Index Number 813]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of November 27, 2017, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 3.3.00.08 [Index Number 813] 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 Tom Petrak at 706-848-5966.

Respectfully submitted,

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 3.3.00.08 [Index Number 813]

MJY/LBP/amw

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**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 3.3.00.08 [Index Number 813]**

ITAAC Statement

Design Commitment

8. Systems, structures, and components identified as essential targets are protected from the dynamic and environmental effects of postulated pipe ruptures.

Inspections/Tests/Analyses

Following as-built reconciliation, an inspection will be performed of the as-built high and moderate energy pipe rupture mitigation features for systems, structures, and components identified as essential targets.

Acceptance Criteria

An as-built Pipe Rupture Hazard Analysis Report exists and concludes that systems, structures, and components identified as essential targets can withstand the effects of postulated pipe rupture without loss of required safety function.

ITAAC Completion Description

Following as-built reconciliation, an inspection is performed of the as-built high and moderate energy pipe rupture mitigation features for systems, structures, and components (SSCs) identified as essential targets. An as-built Pipe Rupture Hazard Analysis (PRHA) report is produced which concludes that SSCs identified as essential targets can withstand the effects of postulated pipe rupture without loss of required safety function.

The results of these as-built inspections are documented in SV3-GW-GLR-XXX and SV4-GW-GLR-XXX, AP1000 As-Built Pipe Rupture Hazards Analysis (PRHA) Summary Report for the Auxiliary Building – All Levels (References 1 and 2, respectively), and SV3-GW-GLR-YYY and SV4-GW-GLR-YYY, AP1000 As-Built Pipe Rupture Hazards Analysis (PRHA) Summary Report for the Containment Building – All Levels (References 3 and 4, respectively).

These as-built reports are prepared in consideration of the criteria and methods defined in Updated Final Safety Analysis Report (UFSAR) subsections 3.6.1.3.2 and 3.6.2.5, and SSCs that are required to be functional during and following a design basis event are confirmed to remain protected against or remain designed to withstand the dynamic and environmental effects of postulated failure in high and moderate energy piping. The as-built PRHA reports document and conclude the reconciliation of the as-built SSCs identified as essential targets can withstand the effects of postulated pipe rupture without loss of required safety function.

References 1 through 4 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 3.3.00.08 Completion Package (References 5 & 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. SV3-GW-GLR-XXX, AP1000 As-Built Pipe Rupture Hazards Analysis (PRHA) Summary Report for the Auxiliary Building - All Levels
2. SV4-GW-GLR-XXX, AP1000 As-Built Pipe Rupture Hazards Analysis (PRHA) Summary Report for the Auxiliary Building - All Levels
3. SV3-GW-GLR-YYY, AP1000 As-Built Pipe Rupture Hazards Analysis (PRHA) Summary Report for Containment Building - All Levels
4. SV4-GW-GLR-YYY, AP1000 As-Built Pipe Rupture Hazards Analysis (PRHA) Summary Report for Containment Building - All Levels
5. ITAAC 3.3.00.08 Completion Package (Unit 3)
6. ITAAC 3.3.00.08 Completion Package (Unit 4)
7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"