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**NOV 30 2017**

Docket Nos.: 52-025  
52-026

ND-17-1988  
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555-0001

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.ix [Index Number 194]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of November 28, 2017, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.03.08c.ix [Index Number 194] 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,

A handwritten signature in blue 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 2.2.03.08c.ix [Index Number 194]

MJY/LBP/amw

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Document Services RTYPE: VND.LI.L06  
File AR.01.02.06

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**Southern Nuclear Operating Company  
ND-17-1988  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.2.03.08c.ix [Index Number 194]**

## **ITAAC Statement**

### **Design Commitment**

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

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

ix) Inspections will be conducted of the insulation used inside the containment on the ASME Class 1 lines, reactor vessel, reactor coolant pumps, pressurizer and steam generators.

Inspections will be conducted of other insulation used inside the containment within the zone of influence (ZOI).

Inspection will be conducted of other insulation below the maximum flood level of a design basis loss-of-coolant accident (LOCA).

### **Acceptance Criteria**

ix) The type of insulation used on these lines and equipment is a metal reflective type or a suitable equivalent. If an insulation other than metal reflective insulation is used, a report must exist and conclude that the insulation is a suitable equivalent.

The type of insulation used on these lines and equipment is a metal reflective type or a suitable equivalent. If an insulation other than metal reflective insulation is used, a report must exist and conclude that the insulation is a suitable equivalent.

The type of insulation used on these lines is metal reflective insulation, jacketed fiberglass, or a suitable equivalent. If an insulation other than metal reflective or jacketed fiberglass insulation is used, a report must exist and conclude that the insulation is a suitable equivalent.

## **ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate the Passive Core Cooling System (PXS) provides Reactor Coolant System (RCS) makeup, boration, and safety injection during design basis events. For this ITAAC, inspections are performed to verify that the type of insulation used on specified equipment in the PXS is metal reflective insulation, jacketed fiberglass, or a suitable equivalent.

Metal reflective insulation is used on ASME class 1 lines because they are subject to loss-of-coolant accidents. Metal reflective insulation is also used on the reactor vessel, the reactor coolant pumps, the steam generators and on the pressurizer because they have relatively large insulation surface areas and are located close to large ASME class 1 lines and therefore subject to jet impingement during loss-of-coolant accidents. A suitable equivalent insulation to metal reflective may be used.

The ZOI in the absence of intervening components, supports, structures, or other objects includes insulation in a cylindrical area extending out a distance equal to 45 inside diameters from the break along an axis that is a continuation of the pipe axis and up to 5 inside diameters

in the radial direction from the axis. A suitable equivalent insulation to metal reflective may be used as discussed in the previous paragraph.

Insulation used inside the containment outside the ZOI but below the maximum post-design basis accident (DBA) LOCA floodup water level (plant elevation 110.2 feet) is metal reflective insulation, jacketed fiberglass, or a suitable equivalent.

Receipt inspection and review of the completed work packages of the insulation used for the following equipment is performed:

- (1) Insulation used inside the containment on the ASME Class 1 lines
- (2) Insulation used on the reactor vessel
- (3) Insulation used on the reactor coolant pumps
- (4) Insulation used on the pressurizer
- (5) Insulation used on the steam generators
- (6) Other insulation used inside the containment within the zone of influence (ZOI)
- (7) Other insulation used inside containment, outside the ZOI, but below the maximum floodup water level of a design basis loss-of-coolant accident (LOCA)

For items (1) – (6), the inspection verifies that the type of insulation used is a metal reflective type or a suitable equivalent. If insulation other than metal reflective insulation is used, then a report is prepared that concludes that the insulation used is a suitable equivalent.

For item (7), the inspection verifies that the type of insulation used is a metal reflective type, jacketed fiberglass, or a suitable equivalent. If insulation other than metal reflective or jacketed fiberglass insulation is used, then a report is prepared that concludes that the insulation used is a suitable equivalent.

The results of the inspections of the type of insulation used for the specified in-containment equipment are documented in Unit 3 and Unit 4 Insulation Inspection Report (References 1 and 2, respectively). The results verify that the type of insulation used for the specified in-containment equipment is either metal reflective insulation, jacketed fiberglass, or a suitable equivalent.

The results of the testing and analysis of a suitable alternate insulation used for the specified in-containment equipment are documented in Unit 3 and Unit 4 Alternate Insulation Evaluation Report (References 3 and 4, respectively), if required. The results provide justification confirming the suitability of the alternate insulation used.

References 1 through 4 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.2.03.08c.ix Completion Packages (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. Procedure XXX, Insulation Inspection Report (Unit 3)
2. Procedure YYY, Insulation Inspection Report (Unit 4)
3. Procedure WWW, Alternate Insulation Evaluation Report (Unit 3)
4. Procedure ZZZ, Alternate Insulation Evaluation Report (Unit 4)
5. ITAAC 2.2.03.08c.ix Completion Package (Unit 3)
6. ITAAC 2.2.03.08c.ix Completion Package (Unit 4)
7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"