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U.S. Nuclear Regulatory Commission  
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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 3.2.00.01d [Index Number 743]

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 3.2.00.01d [Index Number 743] 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 706-848-1575.

Respectfully submitted,

Handwritten signature of Amanda Pugh Sor in cursive.

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 3.2.00.01d [Index Number 743]

MJY/LBP/amw

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**Southern Nuclear Operating Company  
ND-17-2031  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 3.2.00.01d [Index Number 743]**

## **ITAAC Statement**

### **Design Commitment**

1. The HFE verification and validation program is performed in accordance with the HFE verification and validation implementation plan and includes the following activities:

d) Issue resolution verification

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

d) An evaluation of the implementation of the HFE design issue resolution verification will be performed.

### **Acceptance Criteria**

d) A report exists and concludes that: HFE design issue resolution verification was conducted in conformance with the implementation plan and includes verification that human factors issues documented in the design issues tracking system have been addressed in the final design.

## **ITAAC Completion Description**

Multiple ITAAC are performed to confirm that the Human Factors Engineering (HFE) Verification and Validation (V&V) program is performed in accordance with the HFE V&V implementation plan. The subject ITAAC performs an evaluation of the implementation of the HFE design issue resolution verification.

Human Engineering Discrepancies (HEDs) are departures of the AP1000 design from HFE design guidance and/or human performance criteria as identified during the execution of HFE V&V activities. The objective of the HFE issue resolution verification is to ensure that HEDs are documented, tracked, and adequately addressed in the final AP1000 design. The HFE issue resolution verification is conducted in accordance with "AP1000 Human Factors Engineering Discrepancy Resolution Process", APP-OCS-GEH-420 (Reference 1).

The HED plan for the AP1000 plant was developed based on the information and guidance described in NUREG-0711, "Human Factors Engineering Program Review Model". The overall objective of the HFE design issue resolution verification is to ensure that the AP1000 design attains a high standard of human factors adequacy and thereby contributes to the safety, operability and maintainability of the plant. The HEDs identified during previous HFE V&V activities and ITAAC completion are prioritized and placed into the Human Factors Tracking System and assigned to a specialist or relevant group for resolution.

For HED design resolutions associated with the HFE Design Verification, the HFE Task Support Verification, or the HFE Integrated System Validation, independent verifiers will evaluate the Human-System Interface (HSI) design changes using the same standards, guidance and methodology as described in the corresponding verification plan. The purpose of the evaluation is to provide reasonable assurance that the HSI resources and Operations and Controls Centers Systems (OCS) designs satisfy the applicable criteria.

The results of the HFE issue resolution process are documented in the Principal Closure Document APP-OCS-GER-420 (Reference 2) and conclude that the HFE design issue resolution verification is

conducted in conformance with the implementation plan and includes verification that human factors issues documented in the design issues tracking system are addressed in the final design.

References 1 and 2 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 3.2.00.01d Completion Packages (References 3 and 4).

### **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. APP-OCS-GEH-420, "AP1000 Human Factors Engineering Discrepancy Resolution Process"
2. APP-OCS-GER-420, "AP1000 Human Factors Engineering Issue Resolution Verification Report"
3. XXX, "Completion Package for U3 ITAAC 3.2.00.01d [Index Number 743]"
4. YYY, "Completion Package for U4 ITAAC 3.2.00.01d [Index Number 743]"
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"