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52-026

ND-17-2043  
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 3.3.00.02h [Index Number 776]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of January 02, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 3.3.00.02h [Index Number 776] 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,

Michael J. Yox  
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Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 3.3.00.02h [Index Number 776]

MJY/LBP/amw

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**Southern Nuclear Operating Company  
ND-17-2043  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 3.3.00.02h [Index Number 776]**

## **ITAAC Statement**

### **Design Commitment**

2.h) The free volume in the containment allows for floodup to support long-term core cooling for postulated loss-of-coolant accidents.

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

An inspection will be performed of the as-built containment structures and equipment. The portions of the containment included in this inspection are the volumes that flood with a loss-of-coolant accident in passive core cooling system valve/equipment room B (11207). The in-containment refueling water storage tank volume is excluded from this inspection.

### **Acceptance Criteria**

A report exists and concludes that the floodup volume of this portion of the containment is less than 73,500 ft<sup>3</sup> to an elevation of 108'.

## **ITAAC Completion Description**

An inspection is performed of the as-built containment structures and equipment. The volumes included in the inspection and calculation are the volumes that flood with a loss-of-coolant accident (LOCA) in passive core cooling system (PXS) valve/equipment room B (11207). The In-containment Refueling Water Storage tank (IRWST) volume is excluded from this inspection. The inspection report concludes that the floodup volume of this portion of the containment is less than 73,500 ft<sup>3</sup> to an elevation of 108' which demonstrates the free volume in the containment allows for floodup to support long-term core cooling for postulated loss-of-coolant accidents.

The inspection consists of measuring the areas in containment that flood with a LOCA in the PXS valve/equipment Room B (11207) using measurement equipment in accordance with site procedures. These measurements are used to confirm the calculation inputs (References 1 and 2), or used to calculate the free volume available is less than 73,500 ft<sup>3</sup> to an elevation of 108'.

The results of the inspection and a summary of the calculations for Unit 3 and Unit 4 are documented in Principle Closure Document XXX (Unit 3) and Principle Closure Document YYY (Unit 4) (References 3 and 4). The reports conclude that the floodup volume of the specified portions of the containment to an elevation of 108' is calculated to be XX,XXX ft<sup>3</sup> (for Unit 3), and YY,YYY ft<sup>3</sup> (for Unit 4), which meets the ITAAC acceptance criteria of less than 73,500 ft<sup>3</sup> to an elevation of 108' for each unit. The results verify that the free volume in the containment allows for floodup to support long-term core cooling for postulated loss-of-coolant accidents.

The Unit 3 and Unit 4 Principal Closure Documents XXX and YYY are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 3.3.00.02h Completion Packages (References 5 and 6).

**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-PXS-M3C-033, "Containment Flood-Up Volume Calculation"
2. APP-PXS-M3C-034, "Containment Flood-Up Level"
3. Principal Closure Document XXX (Unit 3)
4. Principal Closure Document YYY (Unit 4)
5. XXX, "Completion Package for Unit 3 ITAAC 3.3.00.02h [Index Number 776]"
6. YYY, "Completion Package for Unit 4 ITAAC 3.3.00.02h [Index Number 776]"
7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"