



Michael J. Yox  
Regulatory Affairs Director  
Vogtle 3 & 4

7825 River Road  
Waynesboro, GA 30830  
706-848-6459 tel  
410-474-8587 cell  
myox@southernco.com

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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 2.2.03.01 [Index Number 158]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of March 5, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.03.01 [Index Number 158] 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  
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.2.03.01 [Index Number 158]

MJY/LBP/amw

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To:

**Southern Nuclear Operating Company/ Georgia Power Company**

Mr. D. A. Bost (w/o enclosures)

Mr. M. D. Rauckhorst (w/o enclosures)

Mr. M. D. Meier

Mr. D. H. Jones (w/o enclosures)

Mr. D. L. McKinney

Mr. M. J. Yox

Mr. D. L. Fulton

Mr. J. B. Klecha

Mr. F. H. Willis

Ms. A. L. Pugh

Mr. A. S. Parton

Mr. W. A. Sparkman

Mr. C. E. Morrow

Ms. K. M. Stacy

Mr. M. K. Washington

Mr. J. P. Redd

Ms. A. C. Chamberlain

Mr. D. R. Culver

Mr. T. G. Petrak

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cc:

**Nuclear Regulatory Commission**

Mr. W. Jones (w/o enclosures)

Ms. J. M. Heisserer

Mr. C. P. Patel

Mr. M. E. Ernstes

Mr. G. J. Khouri

Mr. T. E. Chandler

Ms. S. E. Temple

Ms. P. Braxton

Mr. N. D. Karlovich

Mr. A. J. Lerch

Mr. C. J. Even

Mr. F. D. Brown

Mr. B. J. Kemker

Ms. A. E. Rivera-Varona

Ms. L. A. Kent

Mr. P. B. Donnelly

**Oglethorpe Power Corporation**

Mr. R. B. Brinkman

**Municipal Electric Authority of Georgia**

Mr. J. E. Fuller

Mr. S. M. Jackson

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**Dalton Utilities**

Mr. T. Bundros

**Westinghouse Electric Company, LLC**

Dr. L. Oriani (w/o enclosures)

Mr. D. C. Durham (w/o enclosures)

Mr. M. M. Corletti

Ms. L. G. Iller

Mr. D. Hawkins

Ms. J. Monahan

Mr. J. L. Coward

Ms. N. E. Deangelis

**Other**

Mr. J. E. Hesler, *Bechtel Power Corporation*

Ms. L. Matis, *Tetra Tech NUS, Inc.*

Dr. W. R. Jacobs, Jr., Ph.D., *GDS Associates, Inc.*

Mr. S. Roetger, *Georgia Public Service Commission*

Ms. S. W. Kernizan, *Georgia Public Service Commission*

Mr. K. C. Greene, *Troutman Sanders*

Mr. S. Blanton, *Balch Bingham*

**Southern Nuclear Operating Company  
ND-18-0307  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.2.03.01 [Index Number 158]**

## **ITAAC Statement**

### **Design Commitment**

1. The functional arrangement of the PXS is as described in the Design Description of this Section 2.2.3.

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

Inspection of the as-built system will be performed.

### **Acceptance Criteria**

The as-built PXS conforms with the functional arrangement as described in the Design Description of this Section 2.2.3.

## **ITAAC Completion Description**

An inspection of the as-built passive core cooling system (PXS) is conducted after completion of construction to confirm that the functional arrangement of the PXS is as described in the Design Description of Combined License (COL) Appendix C, Section 2.2.3. This inspection encompasses the structures, systems, and components (SSCs) identified in the COL Appendix C, Section 2.2.3 Design Description, including those in Table 2.2.3-5 and Figure 2.2.3-1.

The inspection (walkdown) is completed in accordance with APP-GW-ITY-004, Functional Arrangement ITAAC Guideline (Reference 1), which requires the preparation of a detailed inspection plan. This inspection plan includes the use of detailed drawings such as Piping and Instrumentation Drawings (P&IDs) or Single Line Elementary Drawings to perform visual observations and compare the as-built system to the Design Description.

The inspection results are documented in the Unit 3 and Unit 4 Principal Closure Documents XXX and YYY (References 2 and 3, respectively) supporting the Unit 3 and Unit 4 ITAAC 2.2.03.01 Completion Packages (References 4 and 5, respectively) and verify that the SSCs are physically arranged and located to perform the functions described in the Design Description and referenced table and figure. The inspection results confirm that the as-built PXS conforms with the functional arrangement as described in the COL Appendix C, Section 2.2.3, Design Description.

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 2.2.03.01 Completion Packages.

## **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-GW-ITY-004, Functional Arrangement Guideline
2. Principal Closure Document XXX (Unit 3)
3. Principal Closure Document YYY (Unit 4)
4. ITAAC 2.2.03.01 Completion Package (Unit 3)
5. ITAAC 2.2.03.01 Completion Package (Unit 4)
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"