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ND-18-0321
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission
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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3 and Unit 4
Resubmittal of Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load
Item 2.2.01.01 [Index Number 90]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of March 6, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.01.01 [Index Number 90] 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.

Southern Nuclear Operating Company (SNC) previously submitted Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load for Item 2.2.01.01 [Index Number 90] ND-18-0099 [ML18045A284] dated February 14, 2018. This resubmittal supersedes ND-18-0099 in its entirety.

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 2.2.01.01 [Index Number 90]

MJY/LBP/amw

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**Southern Nuclear Operating Company
ND-18-0321
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.01.01 [Index Number 90]**

ITAAC Statement

Design Commitment

1. The functional arrangement of the CNS and associated systems is as described in the Design Description of this Section 2.2.1.

Inspections/Tests/Analyses

Inspection of the as-built system will be performed.

Acceptance Criteria

The as-built CNS conforms with the functional arrangement as described in the Design Description of this Section 2.2.1.

ITAAC Completion Description

An inspection of the as-built containment system (CNS) and associated systems is conducted after completion of construction to confirm that the functional arrangement of the CNS and associated systems is as described in the Design Description of Combined License (COL) Appendix C, Section 2.2.1. This inspection encompasses the structures, systems, and components (SSCs) identified in the COL Appendix C, Section 2.2.1 Design Description, including those in Table 2.2.1-4 and Figure 2.2.1-1.

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 2.2.01.01 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 CNS and associated systems conform with the functional arrangement as described in the COL Appendix C, Section 2.2.1, 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 2.2.01.01 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 2.2.01.01 Completion Package (Unit 3)
5. ITAAC 2.2.01.01 Completion Package (Unit 4)
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"