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MAK 19 2018

Docket Nos.: 52-025
52-026

ND-18-0362
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 E.3.9.06.00.06 [Index Number 864]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of March 8, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item E.3.9.06.00.06 [Index Number 864] 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 E.3.9.06.00.06 [Index Number 864]

MJY/RAS/amw

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Document Services RTYPE: VND.LI.L06

File AR.01.02.06

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Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC E.3.9.06.00.06 [Index Number 864]

ITAAC Statement

Program Commitment

6.6 The means exists to estimate integrated dose from the projected and actual dose rates, and for comparing these estimates with the EPA protective action guides (PAGs). [I.10]

Inspections/Tests/Analyses

6.6 A test will be performed of the capabilities to estimate integrated dose from the projected and actual dose rates, and for comparing these estimates with the EPA protective action guides.

Acceptance Criteria

6.6 The means were demonstrated to estimate integrated dose from the dose assessment program and the radiological field monitoring team readings during a radioactive release scenario. The results were compared with the EPA PAGs.

ITAAC Completion Description

A test (drill) is performed to demonstrate the capabilities to estimate integrated dose from the projected and actual dose rates, and for comparing these estimates with the Environmental Protection Agency (EPA) Protective Action Guides (PAGs). A drill scenario, simulating a radiological release to the environment, is developed and conducted using procedure NMP-EP-303, Drill and Exercise Standards (Reference 1). Evaluation of the drill performance confirms that Vogtle Electric Generating Plant (VEGP) Unit 3 & Unit 4 and Emergency Operations Facility (EOF) response personnel demonstrate that the means exist to estimate integrated dose from the dose assessment program and the radiological field monitoring team readings during a radioactive release scenario and for comparing the results with the EPA PAGs.

Personnel respond to the Technical Support Center, EOF, and Operations Support Center based on a scenario involving the release of radioactive materials to the environment. Off-site Field Monitoring Team(s) are dispatched to perform off-site radiological surveys.

Procedure NMP-EP-147-00X, SNC Field Monitoring Teams Radiological Surveys and Sampling (Reference 2), is used to perform offsite radiological surveys to assess offsite dose rates (exposures) and contamination (deposition) levels during the radioactive material release. Procedure NMP-EP-147, Offsite Dose Assessment (Reference 3), is used to estimate integrated dose from the dose assessment program and the radiological field monitoring team survey readings during a radioactive release scenario. The results of the integrated dose estimate from the dose assessment program and the offsite field monitoring team data are compared to the EPA PAG values identified in the SNC Standard Emergency Plan Annex for VEGP Unit 3 & Unit 4, Appendix B – Emergency Action Level Scheme using Procedure NMP-EP-141, Event Classification (Reference 4).

Scenario-specific drill objectives are generated using the guidance provided in procedure NMP-EP-303 to evaluate that response personnel are able to demonstrate that the means exist to estimate integrated dose from the dose assessment program and the radiological field

monitoring team readings during a radioactive release scenario and for comparing the results with the EPA PAGs. An evaluation of the drill performance is conducted per procedure NMP-EP-303 to confirm the drill objectives, which demonstrate that the means exist to estimate integrated dose from the dose assessment program and the radiological field monitoring team readings during a radioactive release scenario and for comparing the results with the EPA PAGs, are met.

The drill performance (test) results are documented in Drill/Exercise Report XXX (Reference 5) per procedure NMP-EP-303. The Drill/Exercise Report documents and confirms that VEGP Unit 3 & Unit 4 and EOF response personnel demonstrated that the means exist to estimate integrated dose from the dose assessment program and the radiological field monitoring team readings during a radioactive release scenario and for comparing the results with the EPA PAGs.

Reference 5 is available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC E.3.9.06.00.06 Completion Packages (References 6 and 7).

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 NMP-EP-303, Drill and Exercise Standards
2. Procedure NMP-EP-147-00X, SNC Field Monitoring Teams Radiological Surveys and Sampling
3. Procedure NMP-EP-147, Offsite Dose Assessment
4. Procedure NMP-EP-141, Event Classification
5. Drill/Exercise Report XXX
6. ITAAC E.3.9.06.00.06 Completion Package (Unit 3)
7. ITAAC E.3.9.06.00.06 Completion Package (Unit 4)
8. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"