



MAR 22 2018

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

Docket Nos.: 52-025
52-026

ND-18-0361
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.3.9.06.00.05 [Index Number 863]

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.3.9.06.00.05 [Index Number 863] 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.3.9.06.00.05 [Index Number 863]

MJY/RAS/amw

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. G. Chick
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
Document Services RTYPE: VND.LI.L06
File AR.01.02.06

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

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-18-0361
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC E.3.9.06.00.05 [Index Number 863]**

ITAAC Statement

Program Commitment

6.5 The means exists to make rapid assessments of actual or potential magnitude and locations of any radiological hazards through liquid or gaseous release pathways, including activation, notification means, field team composition, transportation, communication, monitoring equipment, and estimated deployment times. [1.8]

Inspections/Tests/Analyses

6.5 A test will be performed of the capabilities to make rapid assessments of actual or potential magnitude and locations of radiological hazards through liquid or gaseous release pathways, including activation, notification means, field team composition, transportation, communication, monitoring equipment, and estimated deployment times.

Acceptance Criteria

6.5 The radiological field monitoring team(s) was activated and evaluated. They demonstrated an ability to make rapid assessment of actual or potential magnitude and locations of any radiological hazards through simulated liquid or gaseous release pathways. A qualified field team was notified, activated, briefed and dispatched in accordance with EIPs during a radiological release scenario. The team demonstrated the procedural guidance in team composition, use of monitoring equipment, communication from the field, and locating specific sampling locations.

ITAAC Completion Description

A test (drill) is performed to demonstrate that the means exists to make rapid assessments of actual or potential magnitude and locations of any radiological hazards through liquid or gaseous release pathways, including activation, notification means, field team composition, transportation, communication, monitoring equipment, and estimated deployment times. 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 the ability to activate the radiological field monitoring team(s) and that the team(s) demonstrate an ability to make rapid assessment of actual or potential magnitude and locations of any radiological hazards through simulated liquid or gaseous release pathways. Evaluation of the drill performance also confirms that a qualified field team was notified, activated, briefed and dispatched in accordance with Emergency Implementing Procedures (EIPs) during a radiological release scenario and that the team demonstrated the procedural guidance in team composition, use of monitoring equipment, communication from the field, and locating specific sampling locations.

Personnel respond to the Main Control Room (Simulator), Technical Support Center, EOF, and Operations Support Center emergency response facilities based on a scenario involving the release of radioactive materials to the environment. Personnel qualified to perform Radiological Field Monitoring Team (FMT) activities are notified, activated, briefed and dispatched to perform on-site and off-site radiological surveys per EIP NMP-EP-147-00X, SNC Field Monitoring

Teams Radiological Surveys and Sampling (Reference 2), and its applicable sub-tier documents. EIP NMP-EP-147-00X and the applicable sub-tier documents provide procedural guidance associated with team composition, use of monitoring equipment, communication from the field, and locating specific sampling locations.

FMTs utilize the on-site and off-site radiological survey data to make a rapid assessment of the actual or potential magnitude and location of the radiological hazards associated with a simulated liquid or gaseous release pathway. The results of these radiological surveys are communicated back to the appropriate emergency response facility per NMP-EP-147-00X.

Scenario-specific drill objectives are generated using the guidance provided in procedure NMP-EP-303 (Reference 1) to evaluate that VEGP Unit 3 & Unit 4 and EOF response personnel demonstrate the ability to activate the FMTs and that the team(s) demonstrate an ability to make rapid assessment of actual or potential magnitude and locations of any radiological hazards through simulated liquid or gaseous release pathways. Drill objectives are also generated to evaluate that a qualified field team was notified, activated, briefed and dispatched in accordance with EIPs during a radiological release scenario and that the team demonstrated the procedural guidance in team composition, use of monitoring equipment, communication from the field, and locating specific sampling locations.

An evaluation of drill performance is conducted per procedure NMP-EP-303 to confirm that the drill objectives described above are met.

The drill performance (test) results are documented in Drill/Exercise Report XXX (Reference 3) per procedure NMP-EP-303. The Drill/Exercise Report documents and confirms that VEGP Unit 3 & Unit 4 and EOF response personnel demonstrate the ability to activate the FMTs and that the team(s) demonstrate an ability to make rapid assessment of actual or potential magnitude and locations of any radiological hazards through simulated liquid or gaseous release pathways. Evaluation of the drill performance also confirms that a qualified field team was notified, activated, briefed and dispatched in accordance with EIPs during a radiological release scenario and that the team demonstrated the procedural guidance in team composition, use of monitoring equipment, communication from the field, and locating specific sampling locations.

Reference 3 is available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC E.3.9.06.00.05 Completion Packages (References 4 and 5).

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. Drill/Exercise Report XXX
4. ITAAC E.3.9.06.00.05 Completion Package (Unit 3)
5. ITAAC E.3.9.06.00.05 Completion Package (Unit 4)
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"