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Docket Nos.: 52-025  
52-026ND-18-0339  
10 CFR 52.99(c)(3)U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555-0001Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Unit 3 and Unit 4  
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load  
Item 2.2.03.08c.vii [Index Number 192]

Ladies and Gentlemen:

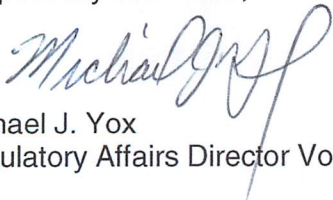
Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of March 21, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.03.08c.vii [Index Number 192] has not been 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 2.2.03.08c.vii [Index Number 192]

MJY/KJD/amw

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**Southern Nuclear Operating Company  
ND-18-0339  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.2.03.08c.vii [Index Number 192]**

### **ITAAC Statement**

#### **Design Commitment:**

8.c) The PXS provides RCS makeup, boration, and safety injection during design basis events.

#### **Inspections, Tests, Analyses:**

vii) Inspection of the as-built components will be conducted for the plate located above the containment recirculation screens.

#### **Acceptance Criteria:**

vii) The plate located above the containment recirculation screens is no more than 1 ft, 3 in above the top of the face of the screens and extends at least 8 ft, 3 in perpendicular to the front and at least 7 ft to the side of the face of the screens.

### **ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate the Passive Core Cooling system (PXS) provides Reactor Coolant System (RCS) makeup, boration, and safety injection during design basis events. For this ITAAC, an inspection of the as-built components is conducted for the plate located above the containment recirculation screens (PXS-MY-Y02A and PXS-MY-Y02B) to confirm the plate is located no more than 1 ft, 3 in above the top of the face of the screens and extends at least 8 ft, 3 in perpendicular to the front and at least 7 ft to the side of the face of the screens.

Inspections are performed on the as-built components by taking as-built measurements using survey equipment in accordance with Nuclear Construction and Startup Procedure (NCSP) 3-24, "Field Surveying" (Reference 1). NCSP 3-24 is used to establish layout and control points for determining the distance between the plate surfaces to the top and side face of the containment recirculation screens. The protective plate maximum height dimension is the distance between the top of the screens and the underside of the protective plate module top plate at the exposed edges of the protective plate, which extend into the containment recirculation water flow (east toward steam generator 2, and north toward the corridor), as described in the Updated Final Safety Analysis Report (UFSAR) Subsection 6.3.2.2.7 (Reference 2). Measurements are taken using survey equipment in accordance with site survey and measurement procedures to derive the distance between the as built components.

The results of the inspection are documented in the Unit 3 and Unit 4 inspection reports (References 3 and 4, respectively) confirming the plate is no more than 1 ft, 3 in above the top of the face of the screens (as-built distance is WW ft, YY in), extends out at least 8 ft, 3 in perpendicular to the front of the screens (as-built distance is WW ft, YY in), and extends between XXX and XXX to the side of the face of the screens (as-built distance is WW ft, YY in), which meets the ITAAC Acceptance Criteria.

References 3 and 4 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.2.03.08c.vii Completion Packages (References 5 and 6, respectively).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. Nuclear Construction and Startup Procedure (NCSP) 3-24, "Field Surveying"
2. Vogtle 3&4 Updated Final Safety Analysis Report, Subsection 6.3.2.2.7 "IRWST and Containment Recirculation Screens"
3. SV3-1100-XXX-XXXXXX Inspection Report for Unit 3 ITAAC 2.2.03.08c.vii [COL Index Number 192]
4. SV4-1100-XXX-XXXXXX Inspection Report for Unit 4 ITAAC 2.2.03.08c.vii [COL Index Number 192]
5. Completion Package for Unit 3 ITAAC 2.2.03.08c.vii [COL Index Number 192]
6. Completion Package for Unit 4 ITAAC 2.2.03.08c.vii [COL Index Number 192]
7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"