

## Vogle PEmails

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**From:** Hoellman, Jordan  
**Sent:** Monday, March 26, 2018 3:01 PM  
**To:** Vogle PEmails  
**Subject:** draft Uncompleted ITAAC Notification (UIN) for ITAAC 2.3.07.07b.i [Index No. 402]  
**Attachments:** 2.3.07.07b.i (402) draft UIN for NRC.PDF

Based on the March 22, 2018, public call discussion on submitting draft UINs that are impacted by LARs in NRC review to the NRC for Staff review/comment, attached is the draft UIN for ITAAC 2.3.07.07b.i [Index Number 402]. Based on the public call, SNC has agreed to informally submit this draft UIN for unofficial Staff review/comment. This draft UIN incorporates the ITA and AC changes requested in LAR 17-021. As discussed in the public call, no cover letter is included, no SNC Letter number is assigned (ND-18-xxxx) and the LAR information is noted on the Enclosure page. Additionally, the changes due to the LAR are indicated by “redlined/strike-out” as requested.

**Hearing Identifier:** Vogtle\_COL\_Docs\_Public  
**Email Number:** 241

**Mail Envelope Properties** (SN6PR09MB2608FE74F1CFEC0FF9217DD7D5AD0)

**Subject:** draft Uncompleted ITAAC Notification (UIN) for ITAAC 2.3.07.07b.i [Index No. 402]  
**Sent Date:** 3/26/2018 3:00:34 PM  
**Received Date:** 3/26/2018 3:00:43 PM  
**From:** Hoellman, Jordan

**Created By:** Jordan.Hoellman2@nrc.gov

**Recipients:**  
"Vogtle PEmails" <Vogtle.PEmails@nrc.gov>  
Tracking Status: None

**Post Office:** SN6PR09MB2608.namprd09.prod.outlook.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	696	3/26/2018 3:00:43 PM
2.3.07.07b.i (402) draft UIN for NRC.PDF		38069

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

**Southern Nuclear Operating Company**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.3.07.07b.i [Index Number 402]**

Note: This draft Notice of Uncompleted ITAAC reflects the proposed changes to ITAAC Item 2.3.07.07b.i requested in License Amendment Request (LAR-17-021), "Changes to Containment Cooling and Spent Fuel Pool Makeup Strategies," dated July 14, 2017 (ND-17-1145, ML17198A596).

## ITAAC Statement

### Design Commitment

7.b) The SFS provides spent fuel cooling for 7 days by boiling the spent fuel pool water and makeup water from on-site storage tanks.

### Inspections/Tests/Analyses

i) Inspection will be performed to verify that the spent fuel pool includes a sufficient volume of water.

### Acceptance Criteria

i) The volume of the spent fuel pool, ~~and~~ fuel transfer canal, and both gate areas above the fuel assemblies and ~~to the elevation 6 feet~~ below the spent fuel pool cooling suction piping operating deck is greater than or equal to 130,350 ~~129,500~~ gallons.

### ITAAC Completion Description

Multiple ITAAC are performed to demonstrate the Spent Fuel Pool Cooling System (SFS) provides spent fuel cooling for 7 days by boiling the spent fuel pool water and makeup water from on-site storage tanks. For this ITAAC, an inspection is performed to verify the volume of the spent fuel pool, ~~and~~ fuel transfer canal, and both gate areas above the fuel assemblies and ~~to the elevation 6 feet~~ below the spent fuel pool cooling suction piping operating deck is greater than or equal to 130,350 ~~129,500~~ gallons.

One of the following options is used to complete the inspection that verifies a sufficient volume of water.

Option 1: An inspection of the spent fuel pool, fuel transfer canal, and both gate areas above the fuel assemblies and below the spent fuel pool cooling suction piping is performed to confirm the as-built dimensions of the described volume. The inspection is performed by taking measurements using survey equipment in accordance with Nuclear Construction and Startup Procedure (NCSP) 3-24, "Field Surveying" (Reference 1). The volume is calculated using the inspection results. The calculated volume of the spent fuel pool, fuel transfer canal, and gate areas above the fuel and to the elevation below the spent fuel pool cooling suction piping is compared to the minimum volume of 130,350 gallons specified in the ITAAC Acceptance Criteria. The results of the comparison are documented in Inspection Report XXX for the Spent Fuel Pool, Fuel Transfer Canal, and Gate Areas Volume (Reference 2), which is available for NRC inspection as part of the ITAAC Completion Package (Reference 3). The results verify the volume of the spent fuel pool, ~~and~~ fuel transfer canal, and both gate areas above the fuel assemblies and ~~to the elevation 6 feet~~ below the spent fuel pool cooling suction piping operating deck is greater than or equal to 130,350 ~~129,500~~ gallons. The calculated volume is ~~###,###~~ gallons.

Option 2: The volume of the spent fuel pool, fuel transfer canal, and both gate areas above the fuel assemblies and below the spent fuel pool cooling suction piping is determined by filling this volume with a specified amount of water measured with a calibrated flow meter. Prior to beginning the measurement of the total volume, the spent fuel pool is filled to an elevation corresponding to the top of the fuel in the Spent Fuel Storage Racks, as well as the fuel transfer

canal, to an elevation corresponding to the top of the of the weir gate bottom structure (i.e., level with the bottom portion of the weir gate frame). The volume of water in the cask loading pit is not included. The recorded volume of water added is compared to the ITAAC Acceptance Criteria. The results of the comparison are documented in Inspection Report XXX for the Spent Fuel Pool, Fuel Transfer Canal, and Gate Areas Volume (Reference 2), which is available for NRC inspection as part of the ITAAC Completion Package (Reference 3). The results verify the volume of the spent fuel pool, ~~and~~ fuel transfer canal, ~~and both gate areas~~ above the fuel assemblies and ~~to the elevation 6 feet~~ below the ~~spent fuel pool cooling suction piping operating deck~~ is greater than or equal to ~~130,350~~ ~~129,500~~ gallons. The measured volume is ~~###,###~~ gallons.

### **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 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. Inspection Report XXX for the Spent Fuel Pool, Fuel Transfer Canal, and Gate Areas Volume
3. ITAAC 2.3.07.07b.i Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"