Southern Nuclear

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

MAR 2 9 2018

Docket Nos.: 52-025
52-026

ND-18-0348
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 2.7.01.02a [Index Number 678]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of March 19, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.7.01.02a [Index Number 678] 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 2.7.01.02a [Index Number 678]

MJY/LBP/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-18-0348
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.7.01.02a [Index Number 678]

ITAAC Statement

Design Commitment:

2.a) The components identified in Table 2.7.1-1 as ASME Code Section III are designed and constructed in accordance with ASME Code Section III requirements.

2.b) The piping identified in Table 2.7.1-2 as ASME Code Section III is designed and constructed in accordance with ASME Code Section III requirements.

3.a) Pressure boundary welds in components identified in Table 2.7.1-1 as ASME Code Section III meet ASME Code Section III requirements.

3.b) Pressure boundary welds in piping identified in Table 2.7.1-2 as ASME Code Section III meet ASME Code Section III requirements.

4.a) The components identified in Table 2.7.1-1 as ASME Code Section III retain their pressure boundary integrity at their design pressure.

4.b) The piping identified in Table 2.7.1-2 as ASME Code Section III retains its pressure boundary integrity at its design pressure.

Inspections, Tests, Analyses:

Inspection will be conducted of the as-built components and piping as documented in the ASME design reports.

Inspection of the as-built pressure boundary welds will be performed in accordance with the ASME Code Section III.

A pressure test will be performed on the components and piping required by the ASME Code Section III to be pressure tested.

Acceptance Criteria:

The ASME Code Section III design reports exist for the as-built components and piping identified in Tables 2.7.1-1 and 2.7.1-2 as ASME Code Section III.

A report exists and concludes that the ASME Code Section III requirements are met for nondestructive examination of pressure boundary welds.

A report exists and concludes that the results of the pressure test of the components and piping identified in Tables 2.7.1-1 and 2.7.1-2 as ASME Code Section III conform with the requirements of the ASME Code Section III.

ITAAC Completion Description

This ITAAC requires inspections, tests, and analyses be performed and documented to ensure the Nuclear Island Nonradioactive Ventilation System (VBS) components and piping listed in the Combined License (COL) Appendix C, Table 2.7.1-1 (Attachment A) and Table 2.7.1-2

(Attachment B) that are identified as American Society of Mechanical Engineers (ASME) Code Section III, are designed and constructed in accordance with applicable requirements.

2.a and 2.b) The ASME Code Section III design reports exist for the as-built components and piping identified in Tables 2.7.1-1 and 2.7.1-2 as ASME Code Section III.

Each component listed in Table 2.7.1-1 as ASME Code Section III is fabricated in accordance with the VEGP Updated Final Safety Analysis Report (UFSAR) and the ASME Code Section III requirements. The ASME Code Section III certified Design Reports for these components exist and document that the as-built components conform to the approved design details. The ASME Section III Design Report for each component is documented in the component's completed ASME Section III Code Data Report. The individual component ASME Section III Code Data Reports are documented on the ASME Section III N-5 Code Data Report(s) for the applicable piping system (Reference 1).

The as-built piping listed in Table 2.7.1-2 including the components listed in Table 2.7.1-1 as ASME Code Section III, are subjected to a reconciliation process (Reference 2), which verifies that the as-built piping are analyzed for applicable loads (e.g. stress reports) and for compliance with all design specification and Code provisions. Design reconciliation of the as-built systems, including installed components, validates that construction completion, including field changes and any nonconforming condition dispositions, is consistent with and bounded by the approved design. All applicable fabrication, installation and testing records, as well as, those for the related Quality Assurance (QA) verification/inspection activities, which confirm adequate construction in compliance with the ASME Code Section III and design provisions, are referenced in the N-5 data report and/or its sub-tier references.

The applicable ASME Section III N-5 Code Data Report(s), which include the location of the certified Design Reports for all the components listed in Table 2.7.1-1 (Attachment A) and piping listed in Table 2.7.1-2 (Attachment B) as ASME Code Section III, exist and conclude that these installed components are designed and constructed (including their installation within the applicable as-built piping system) in accordance with the ASME Code (1998 Edition, 2000 Addenda and 1989 Edition, 1989 Addenda), Section III requirements as applicable, as described in UFSAR Subsection 5.2.1 (Reference 3). The N-5 Code Data Reports for the piping system(s) containing the components listed in the Table 2.7.1-1 and Table 2.7.1-2 are identified in Attachments A and B, respectively.

3.a and 3.b) A report exists and concludes that the ASME Code Section III requirements are met for nondestructive examination of pressure boundary welds.

Inspections are performed in accordance with ASME Code Section III (1998 Edition, 2000 Addenda) to demonstrate that as-built pressure boundary welds in components identified in Table 2.7.1-1 as ASME Code Section III meet ASME Code Section III requirements (i.e., no unacceptable indications).

The applicable non-destructive examinations (including liquid penetrant, magnetic particle, radiographic, and ultrasonic testing, as required by ASME Code Section III) of the components' pressure boundary welds are documented in the Non-destructive Examination Report(s), which support completion of the respective ASME Section III N-5 Code Data Report(s) certified by the Authorized Nuclear Inspector, as listed in Attachment A.

Per ASME Code Section III, Subarticle NCA-8300, "Code Symbol Stamps," the N-5 Code Data Report(s) (Reference 1) documents satisfactory completion of the required examination and testing of the item, which includes non-destructive examinations of pressure boundary welds. Satisfactory completion of the non-destructive examination of pressure boundary welds ensures that the pressure boundary welds in components identified in Table 2.7.1-1 as ASME Code Section III meet ASME Code Section III requirements.

An inspection is performed in accordance with Reference 2 to demonstrate that the as-built pressure boundary welds in piping identified in Table 2.7.1-2 (Attachment B) as ASME Code Section III meet ASME Code Section III requirements (i.e., no unacceptable indications). This portion of the ITAAC is complete when the piping identified in Table 2.7.1-2, which is encompassed within the respective piping system Code Symbol N-Stamp and the corresponding piping system Code N-5 Data Report Form(s) (Reference 1), is complete. The non-destructive examinations (including visual inspection, liquid penetrant, magnetic particle, radiographic, and ultrasonic testing, as required by ASME Code Section III) of the piping pressure boundary welds are documented in the Non-destructive Examination Report(s) within the piping system's supporting data package, which support completion of the respective Code Stamping and Code N-5 Data Report(s). The completion of stamping the respective piping system along with the corresponding ASME Code N-5 Data Report Form(s) (certified by the Authorized Nuclear Inspector) ensure that the piping is constructed in accordance with the design specification(s) and the ASME Code Section III and that the satisfactory completion of the non-destructive examinations of piping pressure boundary welds for the pipe lines identified in Table 2.7.1-2 meet ASME Code Section III requirements and are documented in the Non-destructive Examination Report(s) within the supporting data packages.

4.a and 4.b) A report exists and concludes that the results of the pressure test of the components and piping identified in Tables 2.7.1-1 and 2.7.1-2 as ASME Code Section III conform with the requirements of the ASME Code Section III.

A pressure test is performed by the vendor to demonstrate that the components identified in Table 2.7.1-1 (Attachment A) as ASME Code Section III retain their pressure boundary integrity at their design pressure. The completion of the N-5 Data Reports is governed by Reference 2.

This portion of the ITAAC is complete once each component identified in Table 2.7.1-1 has their individual Code Symbol N-Stamp and corresponding Code Data Report (Reference 1) completed, and the components are installed into the respective Code Symbol N-Stamped piping system and documented on the corresponding N-5 Code Data Report(s) (Reference 1). The pressure testing results of the component's pressure boundary are documented in the Pressure (i.e. hydrostatic) Testing Report(s) within the supporting component's data package, which support completion of the respective Code Stamping and Code Data Report(s).

The completion of stamping the individual components and the respective piping system along with the corresponding ASME Code Data Reports (certified by the Authorized Nuclear Inspector) ensures that the components are constructed in accordance with the Design Specifications and the ASME Code Section III and that the satisfactory completion of the pressure testing of each component identified in Table 2.7.1-1 as ASME Code Section III are documented in the Pressure (i.e. hydrostatic) Testing Report(s) within the supporting data packages and meets ASME Code Section III requirements.

This ITAAC also verifies that the piping identified in Table 2.7.1-2 (Attachment B) fully meets all applicable ASME Code, Section III requirements and retains its pressure boundary integrity at its design pressure.

A pressure test is performed in accordance with procedure XYZ (as applicable) that complies with the ASME Code (1998 Edition, 2000 Addenda), Section III requirements to demonstrate that the ASME Code Section III piping identified in Table 2.7.1-2 retains its pressure boundary integrity at its design pressure.

A pressure test verifies that there are no leaks at welds or piping, and that the pressure boundary integrity is retained at its design pressure. The pressure testing results of the pipe lines are documented in the Pressure Testing Report(s). The Pressure Testing Report(s) supports completion of the ASME Section III N-5 Code Data Report(s) for the applicable piping system (i.e., VBS) (Reference 1).

The applicable ASME Section III N-5 Code Data Report(s) (Reference 1) identified in Attachments A and B documents that the results of the pressure testing of the components and piping identified in Table 2.7.1-1 and Table 2.7.1-2 respectively conform with the requirements of the Code (1998 Edition, 2000 Addenda), Section III.

Reference 1 provides the evidence that the ITAAC Acceptance Criteria requirements are met:.

- The ASME Code Section III design reports exist for the as-built components and piping identified in Tables 2.7.1-1 and 2.7.1-2 as ASME Code Section III;

- A report exists and concludes that the ASME Code Section III requirements are met for nondestructive examination of pressure boundary welds; and

- A report exists and concludes that the results of the pressure test of the components and piping identified in Tables 2.7.1-1 and 2.7.1-2 as ASME Code Section III conform with the requirements of the ASME Code Section III.

Reference 1 is available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.7.01.02a Completion Packages (References 4 and 5, 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, which included now consolidated ITAAC Indexes 679, 680, 681, 682 and 683, found no relevant ITAAC findings associated with this ITAAC:

References (available for NRC inspection)

1. VBS ASME N-5 Code Data Report(s)

2. APP-GW-GAP-139, "Westinghouse/WECTEC ASME N-5 Interface Procedure"

3. VEGP 3&4 Updated Final Safety Analysis Report, Subsection 5.2.1, Compliance with Codes and Code Cases

4. Completion Package for Unit 3 ITAAC 2.7.01.02a [COL Index Number 678]

5. Completion Package for Unit 4 ITAAC 2.7.01.02a [COL Index Number 678]

6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

SYSTEM: Nuclear Island Nonradioactive Ventilation System (VBS)

Equipment Name *	Tag No. *	ASME Code Section III*	N-5 Report
MCR Supply Air Isolation Valve	VBS-PL-V186	Yes	VBS N-5 Code Data Report
MCR Supply Air Isolation Valve	VBS-PL-V187	Yes	VBS N-5 Code Data Report
MCR Return Air Isolation Valve	VBS-PL-V188	Yes	VBS N-5 Code Data Report
MCR Return Air Isolation Valve	VBS-PL-V189	Yes	VBS N-5 Code Data Report
MCR Exhaust Air Isolation Valve	VBS-PL-V190	Yes	VBS N-5 Code Data Report
MCR Exhaust Air Isolation Valve	VBS-PL-V191	Yes	VBS N-5 Code Data Report
PWS MCR Isolation Valve	PWS-PL-V418	Yes	VBS N-5 Code Data Report
PWS MCR Isolation Valve	PWS-PL-V420	Yes	VBS N-5 Code Data Report
PWS MCR Vacuum Relief	PWS-PL-V498	Yes	VBS N-5 Code Data Report
MCR SDS (Vent) Isolation Valve	SDS-PL-V001	Yes	VBS N-5 Code Data Report
MCR SDS (Vent) Isolation Valve	SDS-PL-V002	Yes	VBS N-5 Code Data Report
MCR WWS Isolation Valve	WWS-PL-V506	Yes	VBS N-5 Code Data Report

*Excerpts from COL Appendix C Table 2.7.1-1

Attachment B

SYSTEM: Nuclear Island Nonradioactive Ventilation System (VBS)

Line Name*	Line Number*	ASME Code Section III*	N-5 Report
Main Control Room Supply	VBS-L311	Yes	VBS N-5 Code Data Report
Main Control Room Exhaust	VBS-L312	Yes	VBS N-5 Code Data Report
Main Control Room Toilet Exhaust	VBS-L313	Yes	VBS N-5 Code Data Report
Main Control Room Sanitary Vent Line	SDS-PL-L016	Yes	VBS N-5 Code Data Report
Main Control Room Sanitary Drain Line	SDS-PL-L179	Yes	VBS N-5 Code Data Report
Main Control Room Sanitary Drain Line	SDS-PL-L182	Yes	VBS N-5 Code Data Report
Main Control Room Water Line	PWS-PL-L319+	Yes	VBS N-5 Code Data Report
Main Control Room Water Line	PWS-PL-L320+	Yes	VBS N-5 Code Data Report
Main Control Room Waste Water Line	WWS-PL-L808	Yes	VBS N-5 Code Data Report
Main Control Room Water Line	WWS-PL-L851	Yes	VBS N-5 Code Data Report

*Excerpts from COL Appendix C, Table 2.7.1-2

+ For girth fillet welds between piping and socket welded fittings, valves and flanges, refer to VEGP UFSAR Section 5.2.1.1 (Reference 3).