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10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission
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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 2.5.05.03b [Index Number 570]

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 2.5.05.03b [Index Number 570] 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 2.5.05.03b [Index Number 570]

MJY/LBP/amw

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Southern Nuclear Operating Company
ND-18-0291
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.5.05.03b [Index Number 570]

ITAAC Statement

Design Commitment

3.b) The Class 1E cables between the Incore Thermocouple elements and the connector boxes located on the integrated head package have sheaths.

Inspections/Tests/Analyses

Inspection of the as-built system will be performed.

Acceptance Criteria

The as-built Class 1E cables between the Incore Thermocouple elements and the connector boxes located on the integrated head package have sheaths.

ITAAC Completion Description

Inspection of the as-built Class 1E cables between the Incore Thermocouple elements and the connector boxes (connection panel) located on the integrated head package is performed to verify that the as-built Class 1E cables between the Incore Thermocouple elements and the connection panel located on the integrated head package have sheaths.

The Incore Thermocouple elements and the connection panel located on the Integrated Head Package (IHP) are connected by 38 Class 1E head area cable assemblies (wires and connectors), which transmit the safety-related core exit thermocouple signals to the protection and safety monitoring system (PMS).

Design specifications require internal metallic sheaths that surround and separate the Class 1E thermocouple wires from non-Class 1E detector wires, which are contained within an external spiral wound sheath. The design specifications also include performance tests for overvoltage, insulation resistance, and continuity. Successful test results indicate that the sheaths protect against credible single faults between the Class 1E and non-Class 1E signals.

The Quality Release and Certificate of Conformance verifies the cable assembly acceptance test results. The cable assemblies are installed in accordance with design drawings and installation specifications issued for construction, and work package requirements.

The as-built Class 1E head area cable assemblies are inspected to verify that the design specification and installation specifications are satisfied, to enable each cable to convey the safety-related core exit thermocouple signals to the PMS, as identified in the Combined License (COL) Appendix C ITAAC 2.5.05.03b, Design Description.

The inspections are performed and documented in accordance with Construction Quality Verification Program (Reference 1). The results of the inspections are documented in the Unit 3 and Unit 4 Principal Closure Documents (References 2 and 3) supporting the ITAAC 2.5.05.03b Completion Packages (References 4 and 5). The inspections confirm that each of the as-built

Class 1E cable assemblies between the In-core Thermocouple elements and the connector boxes located on the integrated head package have sheaths.

The Unit 3 and Unit 4 Principal Closure Documents XXX and YYY are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.5.05.03b Completion Packages.

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. 26139-000-4MP-T81C-N7101, "Construction Quality Verification Program"
2. Principal Closure Document XXX (Unit 3)
3. Principal Closure Document YYY (Unit 4)
4. Completion Package for Unit 3 ITAAC 2.5.05.03b [COL Index Number 570]
5. Completion Package for Unit 4 ITAAC 2.5.05.03b [COL Index Number 570]
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"