



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

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ND-18-0445
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 3.3.00.07bb [Index Number 793]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of April 1, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 3.3.00.07bb [Index Number 793] 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 3.3.00.07bb [Index Number 793]

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
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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
Ms. N. C. Coovert

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*

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**Southern Nuclear Operating Company
ND-18-0445
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 3.3.00.07bb [Index Number 793]**

ITAAC Statement

Design Commitment

7.b) Class 1E divisional electrical cables and communication cables associated with only one division are routed in their respective divisional raceways.

Inspections/Tests/Analyses

Inspections of the as-built Class 1E divisional cables and the as-built raceways that route the Class 1E cables will be conducted.

Acceptance Criteria

b) Class 1E electrical cables and communication cables in the non-radiologically controlled area of the auxiliary building associated with only one division are routed in raceways assigned to the same division. There are no other safety division electrical cables in a raceway assigned to a different division.

ITAAC Completion Description

Multiple ITAAC are performed to demonstrate that Class 1E divisional electrical cables and communication cables associated with only one division are routed in their respective divisional raceways. The subject ITAAC requires inspections of the as-built Class 1E divisional cables and the as-built raceways that route the Class 1E cables be conducted to confirm that Class 1E electrical cables and communication cables in the non-radiologically controlled area of the auxiliary building associated with only one division are routed in raceways assigned to the same division and that there are no other safety division electrical cables in a raceway assigned to a different division. The raceway and cable divisional grouping is described in APP-GW-E1-001, Electrical System Design Criteria (Reference 1). Installation specifications provided to the constructor identify the routing criteria, consistent with the ITAAC commitment.

Class 1E electrical cables and communication cables in the non-radiologically controlled area of the auxiliary building are routed in raceways in accordance with design drawings and installation specifications issued for construction, and work package requirements. Completed raceway installation, in-progress cable installation, and completed cable terminations are inspected to ensure the routing criteria in the installation specifications are satisfied. Inspections are performed in accordance with the Construction Quality Verification Program 26139-000-4MP-T81C-N7101 (Reference 2). The completed inspection records document the satisfactory routing of the Class 1E electrical cables and communication cables associated with only one division in raceways assigned to the same division and that there are no other safety division electrical cables in a raceway assigned to a different division.

Cable Separation Reports (References 3 and 4) identify the inspection reports associated with the cable routing inspections, and confirms that the Class 1E electrical cables and communication cables in the non-radiologically controlled area of the auxiliary building associated with only one division are routed in raceways assigned to the same division and that there are no other safety division electrical cables in a raceway assigned to a different division.

The Cable Separation Reports (References 3 and 4) are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 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 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. APP-GW-E1-001, Electrical System Design Criteria
2. 26139-000-4MP-T81C-N7101, Construction Quality Verification Program
3. Unit 3 Cable Separation Report XXX
4. Unit 4 Cable Separation Report XXX
5. Unit 3 ITAAC 3.3.00.07bb Completion Package
6. Unit 4 ITAAC 3.3.00.07bb Completion Package
7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"