



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

APR 17 2018

Docket Nos.: 52-025  
52-026

ND-18-0510  
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 2.2.05.07a.ii [Index Number 266]

Ladies and Gentlemen:

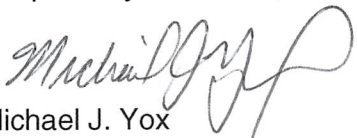
Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of April 6, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.05.07a.ii [Index Number 266] has not been completed 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 2.2.05.07a.ii [Index Number 266]

MJY/KJD/amw

U.S. Nuclear Regulatory Commission

ND-18-0510

Page 2 of 3

**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. Ernestes

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*

U.S. Nuclear Regulatory Commission  
ND-18-0510 Enclosure  
Page 1 of 3

**Southern Nuclear Operating Company  
ND-18-0510  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.2.05.07a.ii [Index Number 266]**

## **ITAAC Statement**

### **Design Commitment**

7.a) The VES provides a 72-hour supply of breathable quality air for the occupants of the MCR.

### **Inspections/Tests/Analyses**

ii) Analysis of storage capacity will be performed based on manufacturers data.

### **Acceptance Criteria**

ii) The calculated storage capacity is greater than or equal to 327,574 scf.

## **ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate that the Main Control Room Emergency Habitability System (VES) provides a 72-hour supply of breathable quality air for the occupants of the Main Control Room (MCR). This ITAAC requires an analysis be performed using manufacturers data to demonstrate that the capacity of the VES emergency air storage tanks is greater than or equal to 327,574 standard cubic feet (scf).

After fabrication, the free volume of the 32 emergency air storage tanks each for Unit 3 and Unit 4 are measured by the manufacturer. To calculate the free volume of each tank, the manufacturer will determine the weight of the air storage tank when empty and when filled with water using a scale. The weight of the empty air storage tank is subtracted from the weight of the water-filled air storage tank to determine the weight of the water within the contained volume of each air storage tank. The weight of the water is converted to volume using a density of water which bounds the industry standard for the temperature range and is conservative. The total free volume in cubic feet for the 32 tanks is the summation of each individual tanks' free volume. The total storage capacity in scf is calculated by converting the total free volume of compressed air at the bounding minimum temperature and pressure conditions to an expanded volume in scf at standard pressure and temperature conditions.

The results of the analysis are documented in the Vogtle Unit 3 and Unit 4 MS23 VES Air-Tank Package Calculated Storage Capacity Summary Reports (References 1 and 2, respectively). The results verify the total calculated storage capacity of the VES emergency air storage tanks is XXX,XXX scf for Unit 3 and YYY,YYY scf for Unit 4 which meet the ITAAC acceptance criteria.

References 1 and 2 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.2.05.07a.ii Completion Packages (References 3 and 4, respectively).

## **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, the Licensee 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. SV3-XXX-YYY-001 "Vogtle Unit 3 MS23 VES Air-Tank Package Calculated Storage Capacity Summary Report"
2. SV4-XXX-YYY-001, "Vogtle Unit 4 MS23 VES Air-Tank Package Calculated Storage Capacity Summary Report"
3. 2.2.05.07a.ii-U3-CP-Rev X, "Completion Package for the Unit 3 ITAAC 2.2.05.07a.ii [Index number 266]"
4. 2.2.05.07a.ii-U4-CP-Rev X, "Completion Package for the Unit 4 ITAAC 2.2.05.07a.ii [Index number 266]"
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52."