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Docket Nos.: 52-025
52-026ND-18-0534
10 CFR 52.99(c)(3)U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3 and Unit 4
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load
Item 2.2.03.09a.i [Index Number 201]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of April 12, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.03.09a.i [Index Number 201] 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 & 4Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.03.09a.i [Index Number 201]

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U.S. Nuclear Regulatory Commission

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**Southern Nuclear Operating Company
ND-18-0534
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.03.09a.i [Index Number 201]**

ITAAC Statement

Design Commitment

9.a) The PXS provides a function to cool the outside of the reactor vessel during a severe accident.

Inspections/Tests/Analyses

i) A flow test and analysis for each IRWST drain line to the containment will be conducted. The test is initiated by opening isolation valves in each line. Test fixtures may be used to simulate squib valves.

Acceptance Criteria

i) The calculated flow resistance for each IRWST drain line between the IRWST and the containment is $\leq 4.44 \times 10^{-6}$ ft/gpm².

ITAAC Completion Description

Multiple ITAAC are performed to verify that the Passive Core Cooling System (PXS) provides a function to cool the outside of the reactor vessel during a severe accident. The subject ITAAC requires a flow test and analysis on each In-containment Refueling Water Storage Tank (IRWST) drain line to the containment to demonstrate that the calculated flow resistance meets acceptance criteria.

Performance tests are conducted in accordance with Unit 3 and Unit 4 preoperational test procedures (Reference 1 and 2, respectively) to demonstrate that the flow resistance in each IRWST drain line to the containment is $\leq 4.44 \times 10^{-6}$ ft/gpm².

This is accomplished by installing a compression plug in the IRWST screen B drain line, installing flow test fixtures for the squib valves in the containment recirculation sump lines, filling the IRWST with demineralized water to act as a temporary water supply, and initiating flow from the A screen in the IRWST into the containment recirculation sump to recirculation injection line B to the reactor vessel. All valves in these lines are opened during the test and sufficient flow is provided to open the check valves. The flow rate between the IRWST and the containment sump A, differential pressure, and IRWST level are monitored and recorded. The process is then repeated with IRWST screen B to the containment sump to reactor vessel injection line A. The constant value for each flow resistance is calculated, based on tank level, differential pressure and discharge flow, adjusted for measurement uncertainty, and compared to the acceptance criteria.

The flow resistance for each Unit 3 IRWST drain line between the IRWST and the containment is calculated to be XXX ft/gpm² (drain line A) and YYY ft/gpm² (drain line B). The flow resistance for each Unit 4 IRWST drain line between the IRWST and the containment is calculated to be XXX ft/gpm² (drain line A) and YYY ft/gpm² (drain line B). The completed Unit 3 and Unit 4 preoperational tests confirm that the calculated flow resistance for each IRWST drain line between the IRWST and the containment is $\leq 4.44 \times 10^{-6}$ ft/gpm².

References 1 and 2 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.2.03.09a.i Completion Packages (References 3 and 4).

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. 3-PXS-ITPP-5XX, "Passive Core Cooling System Preoperational Test Procedure"
2. 4-PXS-ITPP-5XX, "Passive Core Cooling System Preoperational Test Procedure"
3. 2.2.03.09a.i-U3-CP-Rev X, ITAAC Completion Package
4. 2.2.03.09a.i-U4-CP-Rev X, ITAAC Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"