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52-026ND-18-0518
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 2.2.03.08c.i.03 [Index Number 179]

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 2.2.03.08c.i.03 [Index Number 179] 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 2.2.03.08c.i.03 [Index Number 179]

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**Southern Nuclear Operating Company
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Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.03.08c.i.03 [Index Number 179]**

ITAAC Statement

Design Commitment

8.c) The PXS provides RCS makeup, boration, and safety injection during design basis events.

Inspections/Tests/Analyses

i) A low-pressure injection test and analysis for each CMT, each accumulator, each IRWST injection line, and each containment recirculation line will be conducted. Each test is initiated by opening isolation valve(s) in the line being tested. Test fixtures may be used to simulate squib valves.

3. IRWST Injection:

The IRWST will be partially filled with water. All valves in these lines will be open during the test. Sufficient flow will be provided to open the check valves.

Acceptance Criteria

i) The injection line flow resistance from each source is as follows:

3. IRWST Injection:

The calculated flow resistance for each IRWST injection line between the IRWST and the reactor vessel is:

Line A: $\geq 5.35 \times 10^{-6}$ ft/gpm² and $\leq 9.09 \times 10^{-6}$ ft/gpm² and

Line B: $\geq 6.15 \times 10^{-6}$ ft/gpm² and $\leq 1.05 \times 10^{-5}$ ft/gpm².

ITAAC Completion Description

Multiple ITAAC are performed to verify that the Passive Core Cooling System (PXS) provides Reactor Coolant System (RCS) makeup, boration, and safety injection during design basis events. The subject ITAAC requires a low-pressure injection test and analysis on each In-containment Refueling Water Storage Tank (IRWST) injection line to the reactor vessel 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 determine that the flow path from each IRWST injection line to the reactor vessel has a flow resistance $\geq 5.35 \times 10^{-6}$ ft/gpm² and $\leq 9.09 \times 10^{-6}$ ft/gpm² for line A and a flow resistance $\geq 6.15 \times 10^{-6}$ ft/gpm² and $\leq 1.05 \times 10^{-5}$ ft/gpm² for line B.

This is accomplished by installing flow test fixtures for the squib valves in the IRWST injection lines, isolating the containment sump recirculation lines, filling the IRWST with demineralized water to act as a temporary water supply, and initiating flow between the IRWST and direct vessel injection line A. 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 injection line A to the reactor vessel, differential pressure, and IRWST level are measured. This test is repeated for the direct vessel injection line B. The constant value for flow resistance is calculated based on measured tank level, differential pressure, and discharge flow, adjusted for measurement uncertainty, and compared to the acceptance criteria.

The flow resistance for Unit 3 is calculated to be XXX ft/gpm² for the IRWST injection line A flow path and YYY ft/gpm² for the IRWST injection line B flow path. The flow resistance for Unit 4 is calculated to be XXX ft/gpm² for the IRWST injection line A flow path and YYY ft/gpm² for the IRWST injection line B flow path. The completed Unit 3 and Unit 4 preoperational tests confirm that the calculated flow resistance for each IRWST injection line between the IRWST and the reactor vessel is $\geq 5.35 \times 10^{-6}$ ft/gpm² and $\leq 9.09 \times 10^{-6}$ ft/gpm² for line A and $\geq 6.15 \times 10^{-6}$ ft/gpm² and $\leq 1.05 \times 10^{-5}$ ft/gpm² for line B.

References 1 and 2 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.2.03.08c.i.03 Completion Packages (References 3 and 4, 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. 3-PXS-ITPP-5XX, "Passive Core Cooling System Preoperational Test Procedure"
2. 4-PXS-ITPP-5XX, "Passive Core Cooling System Preoperational Test Procedure"
3. 2.2.03.08c.i.03-U3-CP-Rev X, ITAAC Completion Package
4. 2.2.03.08c.i.03-U4-CP-Rev X, ITAAC Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"