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ND-18-0660
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission
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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 2.3.04.02.i [Index Number 327]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of May 4, 2018 Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.3.04.02.i [Index Number 327] 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 & Unit 4
Completion Plan for Uncompleted ITAAC 2.3.04.02.i [Index Number 327]

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**Southern Nuclear Operating Company
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Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 & Unit 4
Completion Plan for Uncompleted ITAAC 2.3.04.02.i [Index Number 327]**

ITAAC Statement

Design Commitment

2. The FPS piping shown on Figure 2.3.4-2 remains functional following a safe shutdown earthquake.

Inspections/Tests/Analyses

i) Inspection will be performed to verify that the piping shown on Figure 2.3.4-2 is located on the Nuclear Island.

Acceptance Criteria

i) The piping shown on Figure 2.3.4-2 is located on the Nuclear Island.

ITAAC Completion Description

Multiple ITAAC are performed to demonstrate that the Fire Protection System (FPS) piping shown on Figure 2.3.4-2 of the Combined License (COL) Appendix C remains functional following a safe shutdown earthquake. The subject ITAAC requires an inspection to verify that the piping shown on COL Appendix C, Figure 2.3.4-2 is located on the Nuclear Island, which is a seismic Category I structure.

To assure that the FPS piping shown on COL Appendix C, Figure 2.3.4-2 remains functional following a safe shutdown earthquake, all the pipelines and inline components/valves are designed to be located on the seismic Category I Nuclear Island. In accordance with procedure XYZ (Reference 1), an inspection is conducted of the FPS to confirm the satisfactory installation of the piping system required to remain functional following a safe shutdown earthquake. The inspection includes verification of the installed piping location (Building and Room).

The inspection results are documented in the Unit 3 and Unit 4 Principal Closure Documents (Reference 2 and 3, respectively) which conclude that the piping shown on COL Appendix C, Figure 2.3.4-2 is located on the Nuclear Island and meets the ITAAC acceptance criteria.

References 1 thru 3 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC Completion Packages (Reference 4 and 5, 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. Inspection Procedure XYZ
2. Principal Closure Document XXX (Unit 3)
3. Principal Closure Document YYY (Unit 4)
4. 2.3.04.02.i-U3-CP-Rev 0, ITAAC Completion Package
5. 2.3.04.02.i-U4-CP-Rev 0, ITAAC Completion Package
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"