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Docket Nos.: 52-025

52-026

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ND-18-0621 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 3.3.00.02a.ii.a [Index Number 764]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of May 1, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 3.3.00.02a.ii.a [Index Number 764] 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 3.3.00.02a.ii.a [Index Number 764]

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Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 3.3.00.02a.ii.a [Index Number 764]

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ITAAC Statement

Design Commitment

2.a) The nuclear island structures, including the critical sections listed in Table 3.3-7, are seismic Category I and are designed and constructed to withstand design basis loads as specified in the Design Description, without loss of structural integrity and the safety-related functions.

Inspections/Tests/Analyses

ii) An inspection of the as-built concrete thickness will be performed.

Acceptance Criteria

ii.a) A report exists that concludes that the containment internal structures as-built concrete thicknesses conform to the building sections defined in Table 3.3-1.

ITAAC Completion Description

Multiple ITAAC are performed to verify the nuclear island structures, including the critical sections listed in Combined License (COL) Appendix C, Table 3.3-7 (Attachment A), are seismic Category I and are designed and constructed to withstand design basis loads as specified in the Design Description, without loss of structural integrity and the safety-related functions. The subject ITAAC requires an inspection be performed and documented in a report that concludes the as-built containment internal structures concrete wall thicknesses conform to the building sections defined in COL Appendix C, Table 3.3-1 (Attachment B).

The inspections are performed of the as-built sections (following concrete placement) in accordance with the requirements of measurement guideline APP-GW-IT-001 (Reference 1), which identifies the location and frequency of inspection points for determining wall thickness to ensure the resulting measurements are representative of the entire section being inspected. The measurements are based on the size and construction type of each section. Measurements are taken using survey equipment in accordance with site survey procedures.

The inspection results are documented in the Unit 3 and Unit 4 principal closure documents (References 2 and 3, respectively) and summarized in Attachment B which meets the ITAAC acceptance criteria.

References 1 thru 3 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 3.3.00.02a.ii.a 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.

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References (available for NRC inspection)

- 1. APP-GW-IT-001, Revision 0, "Guidelines for Concrete Wall and Slab Thickness Measurements"
- 2. Principal Closure Document (Unit 3)
- 3. Principal Closure Document (Unit 4)
- 4. 3.3.00.02a.ii.a-U3-CP-Rev0, ÌTAAC Completion Package
- 5. 3.3.00.02a.ii.a-U4-CP-Rev0, ITAAC Completion Package
- 6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52"

Attachment A

Table 3.3-7, Nuclear Island Critical Structural Sections*

Containment Internal Structures

South west wall of the refueling cavity

South wall of the west steam generator compartment

North east wall of the in-containment refueling water storage tank

In-containment refueling water storage tank steel wall

Column supporting the operating floor

^{*} Excerpt from COL Appendix C, Table 3.3-7

Attachment B

Table 3.3-1, Definition of Wall Thicknesses for Nuclear Island Buildings, Turbine Building, and Annex Building* (1)

Wall or Section Description*	Column Lines* ⁽⁶⁾	Floor Elevation or Elevation Range* ⁽⁶⁾⁽⁷⁾	Concrete Thickness* (2)(3)(4)(5)(8)	Inspection results +	
				Minimum recorded thickness	Maximum recorded thickness
Containment Building	g Internal Structure*				
Shield Wall between Reactor Vessel Cavity and RCDT Room	E-W wall parallel with column line 7 (Inside face is 3'-0" north of column line 7. Width of wall section with stated thickness is defined by inside wall of reactor vessel cavity.)	From 71'-6" to 83'-0"	3'-0" ⁽⁹⁾	X'-xx.x"	Y'-yy.y"
West Reactor Vessel Cavity Wall	N-S wall parallel with column line N (Width of wall section with stated thickness is defined by inside wall of reactor vessel cavity.)	From 83'-0" to 98'-0"	7'-6" ⁽⁹⁾	X'-xx.x"	Y'-yy.y"
North Reactor Vessel Cavity Wall	E-W wall parallel with column line 7 (Width of wall section with stated thickness is defined by inside wall of reactor vessel cavity.)	From 83'-0" to 98'-0"	9'-0" ⁽⁹⁾	X'-xx.x"	Y'-yy.y"
East Reactor Vessel Cavity Wall	N-S wall parallel with column line N (Width of wall section with stated thickness is defined by inside wall of reactor vessel cavity.)	From 83'-0" to 98'-0"	7'-6" ⁽⁹⁾	X'-xx.x"	Y'-yy.y"
West Refueling Cavity Wall	N-S wall parallel with column line N	From 98'-0" to 135'-3"	4'-0"	X'-xx.x"	Y'-yy.y"
North Refueling Cavity Wall	E-W wall parallel with column line 7	From 98'-0" to 135'-3"	4'-0"	X'-xx.x"	Y'-yy.y"

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Wall or Section Description*	Column Lines* ⁽⁶⁾	Floor Elevation or Elevation Range* ⁽⁶⁾⁽⁷⁾	Concrete Thickness* (2)(3)(4)(5)(8)	Inspection results +	
				Minimum recorded thickness	Maximum recorded thickness
Containment Building	g Internal Structure*				
East Refueling Cavity Wall	N-S wall parallel with column line N	From 98'-0" to 135'-3"	4'-0"	X'-xx.x"	Y'-yy.y"
South Refueling Cavity Wall	E-W wall parallel with column line 7	From 98'-0" to 135'-3"	4'-0"	X'-xx.x"	Y'-yy.y"
South wall of west steam generator compartment	Not Applicable	From 103'-0" to 153'-0"	2'-6"	X'-xx.x"	Y'-yy.y"
West wall of west steam generator compartment	N-S wall parallel with column line N	From 103'-0" to 153'-0"	2'-6"	X'-xx.x"	Y'-yy.y"
North wall of west steam generator compartment	Not Applicable	From 103'-0" to 153'-0"	2'-6"	X'-xx.x"	Y'-yy.y"
South wall of pressurizer compartment	Not Applicable	From 103'-0" to 153'-6"	2'-6"	X'-xx.x"	Y'-yy.y"
West wall of pressurizer compartment	N-S wall parallel with column line N	From 107'-2" to 160'-0"	2'-6"	X'-xx.x"	Y'-yy.y"
North wall of pressurizer compartment	E-W wall parallel with column line 7	From 107'-2" to 160'-0"	2'-6"	X'-xx.x"	Y'-yy.y"
East wall of pressurizer compartment	N-S wall parallel with column line N	From 118'-6" to 160'-0"	2'-6"	X'-xx.x"	Y'-yy.y"

Wall or Section Description*	Column Lines* ⁽⁶⁾	Floor Elevation or Elevation Range* ⁽⁶⁾⁽⁷⁾	Concrete Thickness* (2)(3)(4)(5)(8)	Inspection results +	
				Minimum recorded thickness	Maximum recorded thickness
Containment Building	g Internal Structure*				
North-east wall of in- containment refueling water storage tank	Parallel to column line N	From 103'-0" to 135'-3"	2'-6"	X'-xx.x"	Y'-yy.y"
West wall of in- containment refueling water storage tank	Not applicable	From 103'-0" to 135'-3"	5/8" steel plate with stiffeners	X'-xx.x"	Y'-yy.y"
South wall of east steam generator compartment	Not Applicable	From 87'-6" to 153'-0"	2'-6"	X'-xx.x"	Y'-yy.y"
East wall of east steam generator compartment	N-S wall parallel with column line N	From 94'-0" to 153'-0"	2'-6"	X'-xx.x"	Y'-yy.y"
North wall of east steam generator compartment	Not Applicable	From 87'-6" to 153'-0" with a 158'-0" portion	2'-6"	X'-xx.x"	Y'-yy.y"

Notes:

- * Excerpt from COL Appendix C, Table 3.3-1
- + Inspection results are Unit specific
- 1. The column lines and floor elevations are identified and included on Figures 3.3-1 through 3.3-13.
- 2. These wall (and floor) thicknesses have a construction tolerance of ± 1 inch, except as noted and for exterior walls below grade where the tolerance is +12 inches, -1 inch. These tolerances are not applicable to the nuclear island basemat.

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- 3. For walls that are part of structural modules, the concrete thickness also includes the steel face plates. Where faceplates with a nominal thickness of 0.5 inches are used in the construction of the wall modules, the wall thicknesses in this column apply. Where faceplates thicker than the nominal 0.5 inches are used in the construction of the structural wall modules, the wall thicknesses in the area of the thicker faceplates are greater than indicated in this column by the amount of faceplate thickness increase over the nominal 0.5 inches. Overlay plates are not considered part of the faceplates, and thus are not considered in the wall thicknesses identified in this column.
- 4. For floors with steel surface plates, the concrete thickness also includes the plate thickness.
- 5. Where a wall (or a floor) has openings, the concrete thickness does not apply at the opening.
- 6. The Wall or Section Description, Column Line information, and Floor Elevation or Elevation Ranges are provided as reference points to define the general location. The concrete thickness of an item intersecting other walls, roofs or floors at a designated location (e.g., column line) is not intended to be measured to the stated column line, but only to the point where the intersection occurs.
- 7. Where applicable, the upper wall portions extend to their associated roofs, which may vary in elevation, e.g., sloped roofs.
- 8. From one wall/floor section to another, the concrete thickness transitions from one thickness to another, consistent with the configurations in Figures 3.3-1 through 3.3-14.
- 9. This wall thickness has a tolerance of \pm 1-5/8 inch.