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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 E.3.9.08.01.02 [Index Number 871]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of April 24, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item E.3.9.08.01.02 [Index Number 871] 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 E.3.9.08.01.02 [Index Number 871]

MJY/LBP/amw

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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 E.3.9.08.01.02 [Index Number 871]**

ITAAC Statement

Program Commitment

8.1 The licensee conducts a partial participation exercise to evaluate portions of emergency response capabilities, which includes participation by each State and local agency within the plume exposure EPZ that have not been tested in a previous exercise. [N.1]

Inspections/Tests/Analyses

8.1 A partial participation exercise (test) will be conducted within the specified time periods of 10 CFR Part 50, Appendix E.

Acceptance Criteria

8.1.2 Onsite emergency response personnel are mobilized in sufficient number to fill the emergency positions identified in SNC Standard Emergency Plan, Section B, *Emergency Response Organization*, and Vogtle (Units 3 & 4) Standard Emergency Plan Annex, Section 2, *Organizational Control of Emergencies*, and they successfully perform their assigned responsibilities as outlined in Acceptance Criterion 8.1.1.D, *Emergency Response Facilities*.

ITAAC Completion Description

Multiple ITAAC are performed to ensure that a partial participation exercise is conducted to evaluate portions of emergency response capabilities, which includes participation by each State and local agency within the plume exposure Emergency Planning Zone (EPZ) that have not been tested in a previous exercise. This ITAAC performs a partial participation exercise (test) within the specified time periods of 10 CFR Part 50, Appendix E and confirms that onsite emergency response personnel are mobilized in sufficient number to fill the emergency positions identified in Southern Nuclear Operating Company Standard Emergency Plan, Section B, *Emergency Response Organization*, and Standard Emergency Plan Annex for Vogtle Electric Generating Plant Units 3 & 4, Section 2, *Organizational Control of Emergencies*, and they successfully perform their assigned responsibilities as outlined in Acceptance Criterion 8.1.1.D, *Emergency Response Facilities*.

An exercise scenario, simulating a radiological release to the environment, is developed and conducted using procedure NMP-EP-303 (Reference 1). A scenario-specific onsite exercise objective is generated to evaluate that onsite emergency response personnel are mobilized in sufficient number to fill the emergency positions identified in Southern Nuclear Operating Company Standard Emergency Plan (Reference 2), Section B, *Emergency Response Organization*, Table 1 (Technical Support Center (TSC) 75 Minute Augmentation Emergency Response Organization ERO), Table 2 (Operations Support Center (OSC) 75 Minute Augmentation ERO), Table 3 (Emergency Operations Facility (EOF) 75 Minute Augmentation ERO) and Table 4 (Joint Information Center (JIC) Staff); and Standard Emergency Plan Annex for Vogtle Electric Generating Plant Units 3 and 4 (Reference 3), Section 2, *Organizational Control of Emergencies*, Table 2.2.A (Vogtle Electric Generating Plant On-Shift Staffing).

Confirmation that these emergency response personnel perform their assigned responsibilities as outlined in Acceptance Criterion 8.1.1.D, *Emergency Response Facilities*, is documented in

the Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 ITAAC E.3.9.08.01.01 Completion Packages (References 4 and 5).

The partial participation exercise performance (test) results are documented in Drill/Exercise Report XXX (Reference 6) per procedure NMP-EP-303. The Drill/Exercise Report documents and confirms that onsite emergency response personnel are mobilized in sufficient number to fill the emergency positions identified in SNC Standard Emergency Plan, Section B, Emergency Response Organization, and Vogtle (Units 3 & 4) Standard Emergency Plan Annex, Section 2, Organizational Control of Emergencies.

References 1 through 6 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC E.3.9.08.01.02 Completion Packages (References 7 and 8).

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. Procedure NMP-EP-303, Drill and Exercise Standards.
2. Southern Nuclear Operating Company Standard Emergency Plan
3. Southern Nuclear Operating Company Standard Emergency Plan Annex for Vogtle Electric Generating Plant Units 3 and 4
4. E.3.9.08.01.01-U3-CP-RevX, ITAAC Completion Package
5. E.3.9.08.01.01-U4-CP-RevX, ITAAC Completion Package
6. Drill/Exercise Report XXX
7. E.3.9.08.01.02-U3-CP-RevX, ITAAC Completion Package
8. E.3.9.08.01.02-U4-CP-RevX, ITAAC Completion Package
9. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"