

MAY 25 2018Docket Nos.: 52-025
52-026ND-18-0691
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 2.2.03.08c.viii [Index Number 193]

Ladies and Gentlemen:

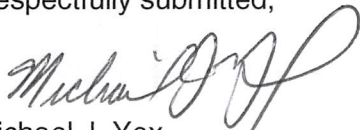
Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of May 10, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.03.08c.viii [Index Number 193] has not been 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 2.2.03.08c.viii [Index Number 193]

MJY/KJD/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 2.2.03.08c.viii [Index Number 193]**

ITAAC Statement

Design Commitment:

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

Inspections/Tests/Analyses:

viii) Inspections of the IRWST and containment recirculation screens will be conducted. The inspections will include measurements of the pockets and the number of pockets used in each screen. The pocket frontal face area is based on a width times a height. The width is the distance between pocket centerlines for pockets located beside each other. The height is the distance between pocket centerlines for pockets located above each other. The pocket screen area is the total area of perforated plate inside each pocket; this area will be determined by inspection of the screen manufacturing drawings.

Acceptance Criteria:

viii) The screens utilize pockets with a frontal face area of $\geq 6.2 \text{ in}^2$ and a screen surface area $\geq 140 \text{ in}^2$ per pocket. IRWST Screens A and B each have a sufficient number of pockets to provide a frontal face area $\geq 25 \text{ ft}^2$, a screen surface area $\geq 575 \text{ ft}^2$, and a screen mesh size of ≤ 0.0625 inch. IRWST Screen C has a sufficient number of pockets to provide a frontal face area $\geq 50 \text{ ft}^2$, a screen surface area $\geq 1150 \text{ ft}^2$, and a screen mesh size ≤ 0.0625 inch. Each containment recirculation screen has a sufficient number of pockets to provide a frontal face area $\geq 105 \text{ ft}^2$, a screen surface area $\geq 2500 \text{ ft}^2$, and a screen mesh size ≤ 0.0625 inch.

A debris curb exists in front of the containment recirculation screens which is ≥ 2 ft above the loop compartment floor.

The bottoms of the IRWST screens are located ≥ 6 in above the bottom of the IRWST.

ITAAC Completion Description

Multiple ITAAC are performed to demonstrate 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 an inspection of the In Containment Refueling Water Storage Tank (IRWST) screens and containment recirculation screens to verify the frontal face area, screen surface area, and screen mesh size meet the acceptance criteria as shown in Attachment A. In addition, inspections are performed to verify the debris curb in front of the containment recirculation screens is ≥ 2 ft above the loop compartment floor, and the bottoms of the IRWST screens are located ≥ 6 in above the bottom of the IRWST.

Following fabrication of the IRWST and containment recirculation screens, the vendor determined the pocket screen area based upon the screen manufacturing drawings. The screen mesh size, which is the hole diameters in the perforated plates, are measured during production of the plates. The results are documented in the quality data package for the screens (References 2 and 3) and shown in Attachment A.

Following installation of the IRWST screens, containment recirculation screens, and debris curb, inspections are performed in accordance with inspection procedure XYZ (Reference 1) to determine the pocket frontal face area and number of pockets in order to calculate the frontal face area of each screen. The inspection procedure utilizes guidance provided in Electric Power Research Institute (EPRI) Report TR-017218-R1 (Reference 4) to determine the number of pockets to measure. The inspection procedure also specifies required inspections and measurement locations to determine the distance from the bottom of the IRWST screens to the IRWST floor, the distance from the top of the containment recirculation screen debris curb to the loop compartment floor, and verification that the debris curb in front of the containment recirculation screens is installed in its proper location and final configuration in accordance with design specifications. Measurements are taken using survey equipment in accordance with site survey and measurement procedures (Reference 7).

The total frontal face area of each screen and total screen surface area is calculated based on the width and height centerline measurements between pockets, the number of pockets installed in each screen, and the screen area inside each pocket. The width and height measurement is the distance between pocket centerlines for pockets located beside each other and above each other, respectively. The screen area inside each pocket is determined based on the screen manufacturing drawings.

The results are documented in the Unit 3 and Unit 4 Principal Closure Documents XXX and YYY (References 5 and 6, respectively) and shown in Attachment A, which meets the ITAAC acceptance criteria.

References 1, 2, 3, 5 and 6 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.2.03.08c.viii Completion Packages (References 8 and 9, respectively).

List of ITAAC Findings

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings 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. SV3-MY03-VQQ-001, Rev. X, "Quality Release and Data Package Vogtle 3 IRWST & Containment Recirculation Screens"
3. SV4-MY03-VQQ-001, Rev. X, "Quality Release and Data Package Vogtle 4 IRWST & Containment Recirculation Screens"
4. EPRI Report TR-017218-R1, "Guideline for Sampling in the Commercial-Grade Item Acceptance Process," January 1999
5. XXX Principal Closure Document (Unit 3)
6. YYY Principal Closure Document (Unit 4)
7. 26139-000-4MP-T81C-N3201, "Construction Surveying"
8. 2.2.03.08c.viii-U3-CP-Rev 0, ITAAC Completion Package
9. 2.2.03.08c.viii-U4-CP-Rev 0, ITAAC Completion Package
10. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

IRWST and Containment Recirculation Screen Areas and Measured Clearances +

Component Name*	Tag No.*	Pocket Frontal Face Area (AC ≥ 6.2 in²)	Screen Surface Area per Pocket (AC ≥ 140 in²)	Screen Mesh size (AC ≤ 0.0625 inch)	Total Calculated Frontal Face Area	Total Calculated Screen Surface Area
IRWST Screen A	PXS-MY-Y01A	x.x in ²	x.x in ²	x.x inch	x.x ft ² (AC ≥ 25 ft ²)	x.x ft ² (AC ≥ 575 ft ²)
IRWST Screen B	PXS-MY-Y01B	x.x in ²	x.x in ²	x.x inch	x.x ft ² (AC ≥ 25 ft ²)	x.x ft ² (AC ≥ 575 ft ²)
IRWST Screen C	PXS-MY-Y01C	x.x in ²	x.x in ²	x.x inch	x.x ft ² (AC ≥ 50 ft ²)	x.x ft ² (AC ≥ 1150 ft ²)
Containment Recirculation Screen A	PXS-MY-Y02A	x.x in ²	x.x in ²	x.x inch	x.x ft ² (AC ≥ 105 ft ²)	x.x ft ² (AC ≥ 2500 ft ²)
Containment Recirculation Screen B	PXS-MY-Y02B	x.x in ²	x.x in ²	x.x inch	x.x ft ² (AC ≥ 105 ft ²)	x.x ft ² (AC ≥ 2500 ft ²)
Minimum measured distance from the top of the debris curb in front of the containment recirculation screens to the loop compartment floor is X.X ft. (AC ≥ 2 ft)						
Minimum measured distance from the bottoms of the IRWST screens to the floor of the IRWST (AC ≥ 6 in). IRWST Screen A bottom is X.X inch above the floor IRWST Screen B bottom is X.X inch above the floor IRWST Screen C bottom is X.X inch above the floor						

* Excerpt from COL Appendix C, Table 2.2.3-1

+ Results are Unit specific