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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 2.2.01.11b [Index Number 118]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of May 29, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.01.11b [Index Number 118] 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 2.2.01.11b [Index Number 118]

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Southern Nuclear Operating Company
ND-18-0666
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.01.11b [Index Number 118]

ITAAC Statement

Design Commitment

11.b) After loss of motive power, the remotely operated valves identified in Table 2.2.1-1 assume the indicated loss of motive power position.

Inspections/Tests/Analyses

Testing of the remotely operated valves will be performed under the conditions of loss of motive power.

Acceptance Criteria

After loss of motive power, each remotely operated valve identified in Table 2.2.1-1 assumes the indicated loss of motive power position.

ITAAC Completion Description

Testing is performed under the conditions of loss of motive power to verify the remotely operated valves identified in Table 2.2.1-1 of the Combined License (COL) Appendix C, (Attachment A), assume the indicated loss of motive power position. The testing verifies that the valves in Attachment A assume the indicated loss of motive power position.

The testing is performed in accordance with the Unit 3 and Unit 4 component test package work orders (References 1 and 2, respectively) for the Containment System (CNS) valves identified in Attachment A under the conditions of loss of motive power. The air-operated valves (AOVs) are placed into the open position, then the power to the air supply solenoid is deenergized, which results in both isolation of compressed air supply from the valves and venting of the actuator. The valve position of each of the valves is locally inspected to confirm that the valves failed closed after motive power removal. The motor-operated valves (MOVs) are positioned as necessary for plant conditions, power is removed and the valves are verified locally to fail as is.

The Unit 3 and Unit 4 component test results (References 1 and 2, respectively) confirm that each remotely operated valve identified in Attachment A assumes the indicated loss of motive power position.

References 1 and 2 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.2.01.11b 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. SNC920991, "CNS Remotely Operated Valve Stroke Test ITAAC:SV3-2.2.01.11b"

2. XXXXXX, "CNS Remotely Operated Valve Stroke Test ITAAC:SV4-2.2.01.11b"

3. 2.2.01.11b-U3-CP-Rev0, ITAAC Completion Package

4. 2.2.01.11b-U4-CP-Rev0, ITAAC Completion Package

5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

CNS Remotely Operated Valves

Equipment Name*	Tag No.*	Remotely Operated Valve *	Loss of Motive Power Position *	Valve Type
Instrument Air Supply Outside Containment Isolation Valve	CAS-PL-V014	Yes	Closed	AOV
Component Cooling Water System (CCS) Containment Isolation Motor-operated Valve (MOV) – Inlet Line Outside Reactor Containment (ORC)	CCS-PL-V200	Yes	As Is	MOV
CCS Containment Isolation MOV – Outlet Line IRC	CCS-PL-V207	Yes	As Is	MOV
CCS Containment Isolation MOV – Outlet Line ORC	CCS-PL-V208	Yes	As Is	MOV
SFS Discharge Line Containment Isolation MOV – ORC	SFS-PL-V038	Yes	As Is	MOV
SFS Suction Line Containment Isolation MOV – IRC	SFS-PL-V034	Yes	As Is	MOV
SFS Suction Line Containment Isolation MOV – ORC	SFS-PL-V035	Yes	As Is	MOV
Containment Purge Inlet Containment Isolation Valve – ORC	VFS-PL-V003	Yes	Closed	AOV
Containment Purge Inlet Containment Isolation Valve – IRC	VFS-PL-V004	Yes	Closed	AOV
Containment Purge Discharge Containment Isolation Valve – IRC	VFS-PL-V009	Yes	Closed	AOV
Containment Purge Discharge Containment Isolation Valve – ORC	VFS-PL-V010	Yes	Closed	AOV

Attachment A

CNS Remotely Operated Valves

Equipment Name*	Tag No.*	Remotely Operated Valve *	Loss of Motive Power Position *	Valve Type
Vacuum Relief Containment Isolation A MOV – ORC	VFS-PL-V800A	Yes	As Is	MOV
Vacuum Relief Containment Isolation B MOV – ORC	VFS-PL-V800B	Yes	As Is	MOV
Fan Coolers Return Containment Isolation Valve – IRC	VWS-PL-V082	Yes	Closed	AOV
Fan Coolers Return Containment Isolation Valve – ORC	VWS-PL-V086	Yes	Closed	AOV
Fan Coolers Supply Containment Isolation Valve – ORC	VWS-PL-V058	Yes	Closed	AOV
Reactor Coolant Drain Tank (RCDT) Gas Outlet Containment Isolation Valve – IRC	WLS-PL-V067	Yes	Closed	AOV
RCDT Gas Outlet Containment Isolation Valve – ORC	WLS-PL-V068	Yes	Closed	AOV
Sump Discharge Containment Isolation Valve – IRC	WLS-PL-V055	Yes	Closed	AOV
Sump Discharge Containment Isolation Valve – ORC	WLS-PL-V057	Yes	Closed	AOV

* Excerpt from COL Appendix C Table 2.2.1-1