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52-026ND-18-0641  
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 C.2.6.09.06 [Index Number 666]

Ladies and Gentlemen:

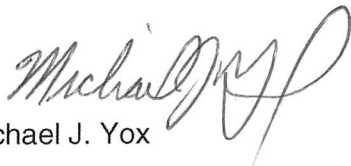
Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of May 21, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item C.2.6.09.06 [Index Number 666] has not been completed 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 C.2.6.09.06 [Index Number 666]

MJY/RAS/amw

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**Southern Nuclear Operating Company  
ND-18-0641  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 & Unit 4  
Completion Plan for Uncompleted ITAAC C.2.6.09.06 [Index Number 666]**

## **ITAAC Statement**

### **Design Commitment**

6. An access control system with numbered picture badges is installed for use by individuals who are authorized access to protected areas and vital areas without escort.

### **Inspections, Tests, Analyses**

A test of the access control system with numbered picture badges will be performed.

### **Acceptance Criteria**

The access authorization system with numbered picture badges can identify and authorize protected area and vital area access only to those personnel with unescorted access authorization.

## **ITAAC Completion Description**

A test of the access control system with numbered picture badges is performed to confirm that the system can identify and authorize protected area and vital area access only to those personnel with unescorted access authorization, and satisfy the applicable access control requirements of the Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR Part 73.55(g)(6)(ii). The VEGP Unit 3 (Unit 4) Plant Security System ITAACs only cover the Unit 3 (Unit 4) plant security system design commitment scope.

A test of the access authorization system is performed using numbered picture test badges prepared both with and without unescorted access authorization to the protected area and vital areas. The test badges and associated biometric data are prepared and controlled per the applicable station procedures. Test badges and associated biometric data are used to attempt access to the protected area, and test badges are used to attempt access to the vital areas. The test confirms the access authorization system will only allow access to the protected area and vital areas for which the test badge is authorized. Similarly, the test will confirm the access authorization system will not allow access for test badges that do not have authorization. The testing confirms the test badge access successes and failures are recorded by the access authorization system. The testing also confirms the Central and Secondary Alarm Stations receive alarms following multiple unauthorized test badge access attempts and provides the protected or vital area test location causing the alarm. The test procedure includes a record of protected and vital area test results, as well as, confirmation that the access authorization system appropriately annunciated and accurately recorded test results.

The numbered picture badge access control system test results are documented in procedures XXX and YYY and confirm that the access authorization system with numbered picture badges can identify and authorize protected area and vital area access only to those personnel with unescorted access authorization to these areas.

References 1 and 2 are available for NRC inspection as part of the ITAAC Completion Packages (References 3 and 4).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found that there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. Procedure XXX, Unit 3 Access Authorization Numbered Picture Badge Test
2. Procedure YYY, Unit 4 Access Authorization Numbered Picture Badge Test
3. C.2.6.09.06-U3-CP-Rev0, ITAAC Completion Package
4. C.2.6.09.06-U4-CP-Rev0, ITAAC Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"