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52-026

ND-18-0851  
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 3.3.00.07c.ii.b [Index Number 798]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of June 18, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 3.3.00.07c.ii.b [Index Number 798] 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 3.3.00.07c.ii.b [Index Number 798]

MJY/LBP/amw

APR 25 1964

TO: DIRECTOR

FROM: SAC, [illegible]

RE: [illegible]

[illegible]

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**Southern Nuclear Operating Company  
ND-18-0851  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 3.3.00.07c.ii.b [Index Number 798]**

## **ITAAC Statement**

### **Design Commitment**

7.c) Separation is maintained between Class 1E divisions in accordance with the fire areas as identified in Table 3.3-3.

### **Inspections/Tests/Analyses**

ii) Inspections of the as-built fire barriers between the fire areas identified in Table 3.3-3 will be conducted.

### **Acceptance Criteria**

ii.b) Results of the inspection will confirm that fire barriers exist between fire areas identified in Table 3.3-3 inside the radiologically controlled area of the auxiliary building.

## **ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate that separation is maintained between Class 1E divisions in accordance with the fire areas as identified in Table 3.3-3. The subject ITAAC requires inspections to be conducted of the as-built fire barriers between the fire areas identified in Table 3.3-3. The Class 1E divisions in Nuclear Island Fire Areas are described in Combined Operating License (COL) Appendix C Table 3.3-3 (Attachment A). The fire barriers between fire areas identified in Table 3.3-3 inside the radiologically controlled area of the auxiliary building are designed in accordance with APP-GW-E1-001 (Reference 1). Installation specifications provided to the constructor identify the fire barriers, consistent with the ITAAC commitment.

Fire barriers between the fire areas identified in the table are installed in accordance with design drawings, installation specifications issued for construction, and work package requirements. Completed fire barriers are inspected to ensure the fire barrier criteria in the installation specifications are satisfied. Inspections are performed in accordance with the Construction Quality Verification Program 26139-000-4MP-T81C-N7101 (Reference 2). The completed inspection records document that satisfactory fire barriers exist between fire areas identified in the table inside the radiologically controlled area of the auxiliary building.

Fire Barrier Reports (References 3 and 4) identify the inspection reports associated with the fire barrier inspections and confirm that fire barriers exist between fire areas identified in Table 3.3-3 inside the radiologically controlled area of the auxiliary building.

The Fire Barrier Reports (References 3 and 4) are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC Completion Packages (References 5 and 6, 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. APP-GW-E1-001, Electrical Systems Design Criteria
2. 26139-000-4MP-T81C-N7101, Construction Quality Verification Program
3. Unit 3 Fire Barrier Report XXX
4. Unit 4 Fire Barrier Report XXX
5. 3.3.00.07c.ii.b-U3-CP-Rev0, ITAAC Completion Package
6. 3.3.00.07c.ii.b-U4-CP-Rev0, ITAAC Completion Package
7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Attachment A**

Class 1E Divisions in Nuclear Island Fire Areas\*

<b>Fire Area Number</b>
<b>Auxiliary Building Radiologically Controlled</b>
1200 AF 01
1204 AF 01

Notes:

\*Excerpt from COL Appendix C Table 3.3-3