Southern Nuclear

Michael J. Yox
Regulatory Affairs Director
Vogtle 3 & 4

7825 River Road
Waynesboro, GA 30830
706-848-6459 tel
410-474-8587 cell
myox@southernco.com

JUN 25 2018

Docket Nos.: 52-025
52-026

ND-18-0874
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission
Document Control Desk
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.i.b [Index Number 796]

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.i.b [Index Number 796] 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,

Thomas L. Petrak for

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.i.b [Index Number 796]

MJY/LBP/amw

JUN 25 2018

To:

Southern Nuclear Operating Company/ Georgia Power Company

Mr. D. A. Bost (w/o enclosures)
Mr. M. D. Meier
Mr. D. H. Jones (w/o enclosures)
Mr. D. L. McKinney
Mr. M. J. Yox
Mr. D. L. Fulton
Mr. J. B. Klecha
Mr. G. Chick
Ms. A. L. Pugh
Mr. A. S. Parton
Mr. W. A. Sparkman
Mr. C. E. Morrow
Ms. K. M. Stacy
Mr. M. K. Washington
Ms. A. C. Chamberlain
Mr. T. G. Petrak
Document Services RTYPE: VND.LI.L06
File AR.01.02.06

cc:

Nuclear Regulatory Commission

Mr. W. Jones (w/o enclosures)
Ms. J. M. Heisserer
Mr. C. P. Patel
Mr. M. E. Ernstes
Mr. G. J. Khouri
Mr. T. E. Chandler
Ms. S. E. Temple
Ms. P. Braxton
Mr. N. D. Karlovich
Mr. A. J. Lerch
Mr. C. J. Even
Mr. F. D. Brown
Mr. B. J. Kemker
Ms. A. E. Rivera-Varona
Ms. L. K. Nist
Mr. P. B. Donnelly
Ms. N. C. Coovert

Oglethorpe Power Corporation

Mr. R. B. Brinkman

Municipal Electric Authority of Georgia

Mr. J. E. Fuller
Mr. S. M. Jackson

Dalton Utilities
Mr. T. Bundros

Westinghouse Electric Company, LLC
Dr. L. Oriani (w/o enclosures)
Mr. D. C. Durham (w/o enclosures)
Mr. M. M. Corletti
Ms. L. G. Iller
Mr. D. Hawkins
Ms. J. Monahan
Mr. J. L. Coward
Ms. N. E. Deangelis

Other
Mr. J. E. Hesler, *Bechtel Power Corporation*
Ms. L. Matis, *Tetra Tech NUS, Inc.*
Dr. W. R. Jacobs, Jr., Ph.D., *GDS Associates, Inc.*
Mr. S. Roetger, *Georgia Public Service Commission*
Ms. S. W. Kernizan, *Georgia Public Service Commission*
Mr. K. C. Greene, *Troutman Sanders*
Mr. S. Blanton, *Balch Bingham*

Southern Nuclear Operating Company
ND-18-0874
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 3.3.00.07c.i.b [Index Number 796]

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

i) Inspections of the as-built Class 1E division electrical cables, as-built communication cables associated with only one division, and the as-built raceways that route the Class 1E divisional electrical cables and communication cables located in the fire areas identified in Table 3.3-3 will be conducted.

Acceptance Criteria

i.b) Results of the inspection will confirm that the separation between Class 1E divisions in the radiologically controlled area of the auxiliary building is consistent with Table 3.3-3.

ITAAC Completion Description

Multiple ITAAC are performed to ensure that separation is maintained between Class 1E divisions in accordance with the fire areas as identified in Table 3.3-3. This ITAAC requires inspections of the as-built Class 1E division electrical cables, as-built communication cables associated with only one division, and the as-built raceways that route the Class 1E divisional electrical cables and communication cables located in the fire areas identified in Table 3.3-3 in the radiologically controlled area of the auxiliary building be conducted to confirm that the separation between Class 1E divisions is consistent with Table 3.3-3. The Class 1E divisions inside the radiologically controlled area of the auxiliary building described in Combined Operating License (COL) Appendix C Table 3.3-3 (Attachment A) are designed to be appropriately separated in accordance with APP-GW-E1-001 (Reference 1). Installation specifications provided to the constructor identify the separation criteria, consistent with the ITAAC commitment.

Class 1E division electrical cables, communication cables, and raceways are installed in accordance with design drawings, installation specifications issued for construction and work package requirements. Completed raceway installation, in-progress and completed cable installation, and completed cable terminations are inspected to ensure the separation 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 the satisfactory separation between Class 1E divisions in the radiologically controlled area of the auxiliary building.

Cable Separation Reports XXX (References 3 and 4) identify the inspection reports associated with the cable and raceway separation inspections and confirm that the separation between Class 1E divisions in the radiologically controlled area of the auxiliary building is consistent with Table 3.3-3.

The Cable Separation Reports (References 3 and 4) are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 3.3.00.07c.i.b 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 ITAAC findings and associated corrective actions. This review found 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, Bechtel Construction Quality Verification Program
3. Unit 3 Cable Separation Report XXX
4. Unit 4 Cable Separation Report XXX
5. 3.3.00.07c.i.b-U3-CP-Rev0, ITAAC Completion Package
6. 3.3.00.07c.i.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 Auxiliary Building Radiologically Controlled Fire Areas*

Fire Area Number	Class 1E Divisions			
	A	C	B	D
1200 AF 01	Yes	Yes	--	--
1204 AF 01	Yes	--	--	--

Notes:

Note: Dash (--) indicates not applicable

*Excerpt from COL Appendix C Table 3.3-3