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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.i.a [Index Number 795]

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.a [Index Number 795] 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.i.a [Index Number 795]

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U.S. Nuclear Regulatory Commission

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**Southern Nuclear Operating Company
ND-18-0868
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 3.3.00.07c.i.a [Index Number 795]**

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.a) Results of the inspection will confirm that the separation between Class 1E divisions in the non-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 non-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 non-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 non-radiologically controlled area of the auxiliary building consistent with COL Appendix C Table 3.3-3.

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 non-radiologically controlled area of the auxiliary building is consistent with COL Appendix C 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.a 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.a-U3-CP-Rev0, ITAAC Completion Package
6. 3.3.00.07c.i.a-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 Non-Radiologically Controlled Fire Areas*

Fire Area Number	Class 1E Divisions			
	A	C	B	D
1200 AF 03	--	--	Yes	Yes
1201 AF 02	-- Note 2	-- Note 2	Yes	-- Note 2
1201 AF 03	-- Note 2	-- Note 2	-- Note 2	Yes
1201 AF 04	--	--	Yes	Yes
1201 AF 05	--	--	Yes	Yes
1201 AF 06	--	--	Yes	Yes
1202 AF 03	-- Note 2	Yes	-- Note 2	-- Note 2
1202 AF 04	Yes	-- Note 2	-- Note 2	-- Note 2
1220 AF 01	--	--	Yes	Yes
1220 AF 02	--	--	--	Yes
1230 AF 01	Yes	Yes	--	--
1230 AF 02	--	--	Yes	Yes
1240 AF 01	Yes	Yes	--	--
1242 AF 02	Yes		--	

Notes:

Note 1: Dash (--) indicates not applicable

Note 2: Cables from this division in this fire area are limited to interdivisional cables terminating in this fire area.

*Excerpt from COL Appendix C Table 3.3-3