

**JUN 25 2018**Docket Nos.: 52-025  
52-026ND-18-0875  
10 CFR 52.99(c)(3)U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555-0001Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Unit 3 and Unit 4  
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load  
Item 3.3.00.07d.i [Index Number 799]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of June 20, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 3.3.00.07d.i [Index Number 799] 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 & 4Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 3.3.00.07d.i [Index Number 799]

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U.S. Nuclear Regulatory Commission

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**Southern Nuclear Operating Company  
ND-18-0875  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 3.3.00.07d.i [Index Number 799]**

## **ITAAC Statement**

### **Design Commitment**

7.d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

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

Inspections of the as-built raceways that route Class 1E cables will be performed to confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following:

i) Within the main control room and remote shutdown room (non-hazard areas), the minimum separation for low-voltage power cables and below is defined by one of the following:

- 1) For configurations involving open configurations to enclosed configurations with low-voltage power cables, the minimum vertical separation is 3 inches and the minimum horizontal separation is 1 inch.
- 2) For configurations involving an enclosed raceway and an open raceway with low-voltage power cables, the minimum vertical separation is 1 inch if the enclosed raceway is below the open raceway.
- 3) For configurations involving enclosed raceways, the minimum separation is 1 inch in both horizontal and vertical directions.
- 4) For configurations involving open configurations, and an enclosed raceway and an open raceway, with instrumentation and control cables, the minimum separation is 1 inch in both horizontal and vertical directions.

### **Acceptance Criteria**

Results of the inspection will confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following:

i) Within the main control room and remote shutdown room (non-hazard areas) the minimum separation for low-voltage power cables and below meets one of the following:

- 1) For configurations involving open configurations to enclosed configurations with low-voltage power cables, the vertical separation is 3 inches or more and the horizontal separation is 1 inch or more.
- 2) For configurations that involve an enclosed raceway and an open raceway with low-voltage power cables, the minimum vertical separation may be reduced to 1 inch if the enclosed raceway is below the open raceway.

3) For configurations that involve enclosed raceways, the minimum separation is 1 inch in both horizontal and vertical directions.

4) For configurations that involve open configurations, and an enclosed raceway and an open raceway, with instrumentation and control cables, the minimum separation is 1 inch in both horizontal and vertical directions.

### **ITAAC Completion Description**

Multiple ITAAC are performed to ensure that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables. This ITAAC requires inspections of the as-built raceways that route Class 1E cables and raceways that route non-Class 1E cables inside the main control room and remote shutdown room to confirm that physical separation between raceways that route Class 1E cables of different divisions and between raceways that route Class 1E cables and raceways that route non-Class 1E cables meet the required separation distances. The Class 1E cables and raceways and non-Class 1E cables inside the main control room and remote shutdown room 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 electrical 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 raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables.

Cable Separation Reports XXX (References 3 and 4) identify the inspection reports associated with the raceway separation inspections and confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following:

Within the main control room and remote shutdown room (non-hazard areas) the minimum separation for low-voltage power cables and below meets one of the following:

1) For configurations involving open configurations to enclosed configurations with low-voltage power cables, the vertical separation is 3 inches or more and the horizontal separation is 1 inch or more.

2) For configurations that involve an enclosed raceway and an open raceway with low-voltage power cables, the minimum vertical separation may be reduced to 1 inch if the enclosed raceway is below the open raceway.

3) For configurations that involve enclosed raceways, the minimum separation is 1 inch in both horizontal and vertical directions.

- 4) For configurations that involve open configurations, and an enclosed raceway and an open raceway, with instrumentation and control cables, the minimum separation is 1 inch in both horizontal and vertical directions.

The Cable Separation Reports (References 3 and 4) are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 3.3.00.07d.i 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, Construction Quality Verification Program
3. Unit 3 Cable Separation Report XXX
4. Unit 4 Cable Separation Report XXX
5. 3.3.00.07d.i-U3-CP-Rev0, ITAAC Completion Package
6. 3.3.00.07d.i-U4-CP-Rev0, ITAAC Completion Package
7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"