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10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission
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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 2.3.07.07b.ii [Index Number 403]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of June 12, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.3.07.07b.ii [Index Number 403] 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 2.3.07.07b.ii [Index Number 403]

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**Southern Nuclear Operating Company
ND-18-0829
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 & Unit 4
Completion Plan for Uncompleted ITAAC 2.3.07.07b.ii [Index Number 403]**

ITAAC Statement

Design Commitment

7.b) The SFS provides spent fuel cooling for 7 days by boiling the spent fuel pool water and makeup water from on-site storage tanks.

Inspections, Tests, Analyses

ii) Inspection will be performed to verify the cask washdown pit includes sufficient volume of water.

Acceptance Criteria

ii) The water volume of the cask washdown pit from the cask washdown pit floor to 13.75 feet above the cask washdown pit floor is greater than or equal to 34,100 gallons.

ITAAC Completion Description

Multiple ITAAC are performed to demonstrate the Spent Fuel Pool Cooling System (SFS) provides spent fuel cooling for 7 days by boiling the spent fuel pool water and makeup water from on-site storage tanks. This ITAAC performs an inspection to verify the water volume of the Cask Washdown Pit (CWP) from the CWP floor to 13.75 feet above CWP floor is greater than or equal to 34,100 gallons.

An inspection is performed of the as-built CWP to confirm the internal volume from the floor to 13.75 feet above the floor. Measurements are taken of the as-built dimensions of the rectangular CWP internal length and width from the CWP floor to 13.75 feet above the CWP floor and results are used to calculate the internal volume. Measurements are taken using survey equipment in accordance with the site survey and measurement procedure (Reference 1). Inspections are also performed to determine the water displacement volume associated with the personnel access ladder located in the CWP. The water displacement volume of the ladder is subtracted from the CWP internal volume to obtain the net water volume.

The results are documented in the Unit 3 and Unit 4 Principal Closure Documents (Reference 2 and 3, respectively) which show the water volume of the CWP from the floor of the CWP to 13.75 feet above the floor of the CWP is xx,xxx gallons for Unit 3 and yy,yyy gallons for Unit 4 and meets the ITAAC acceptance criteria.

References 2 and 3 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC completion packages (Reference 4 and 5, 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. 26139-000-4MP-T81C-N3201, "Construction Survey"
2. Principal Closure Document (Unit 3)
3. Principal Closure Document (Unit 4)
4. 2.3.07.07b.ii-U3-CP-Rev0, ITAAC Completion Package
5. 2.3.07.07b.ii-U4-CP-Rev0, ITAAC Completion Package
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"