



JUN 26 2018

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

Docket Nos.: 52-025
52-026

ND-18-0847
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 2.6.09.06 [Index Number 647]

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 2.6.09.06 [Index Number 647] 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 2.6.09.06 [Index Number 647]

MJY/RAS/amw

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
Mr. F. H. Willis
Ms. A. L. Pugh
Mr. A. S. Parton
Mr. W. A. Sparkman
Mr. C. E. Morrow
Ms. K. M. Stacy
Mr. M. K. Washington
Mr. J. P. Redd
Ms. A. C. Chamberlain
Mr. D. R. Culver
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. A. Kent
Mr. P. B. Donnelly
Ms. N. C. Coover

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-18-0847
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 & Unit 4
Completion Plan for Uncompleted ITAAC 2.6.09.06 [Index Number 647]**

ITAAC Statement

Design Commitment

6. The vehicle barrier system is installed and located at the necessary stand-off distance to protect against the DBT vehicle bombs.

Inspections, Tests, Analyses

Inspections and analysis will be performed for the vehicle barrier system.

Acceptance Criteria

The vehicle barrier system will protect against the DBT vehicle bombs based upon the stand-off distance of the system.

ITAAC Completion Description

Inspections and analysis of the vehicle barrier system (VBS, as defined by NUREG-2203) are performed to ensure the system is installed and located at the necessary stand-off distance to protect against the Design Basis Threat (DBT) vehicle bombs. The inspections and analysis confirm the VBS will protect against the DBT vehicle bombs based upon the stand-off distance of the VBS and satisfy the applicable VBS stand-off distance requirements of the Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR 73.55(e)(10). The VEGP Unit 3 [Unit 4] Plant Security System ITAACs only cover the Unit 3 [Unit 4] plant security system design commitment scope.

The design, construction and installation of the VBS is based upon analyses of the minimum safe stand-off distance (MSSD) required to provide adequate protection of the personnel, equipment, and systems necessary to prevent significant core damage and spent fuel pool sabotage against the effects of the DBT of radiological sabotage and vehicle bomb assault. The Unit 3 [Unit 4] MSSD is established by standard plant analysis (Reference 1), as supplemented by the site specific MSSD analysis (Reference 2 [3]).

Procedure XXX, Unit 3 [Unit 4] Vehicle Barrier System Stand-off Distance Inspection Procedure (Reference 4 [5]), performs an inspection to confirm the VBS is installed at stopping distances equal to or greater than the MSSDs established by analyses (References 1 and 2 [1 and 3]). The inspection also confirms that the as-built VBS installation is consistent with the VBS design and installation analyses assumptions.

The VBS DBT inspection and analysis results are documented in References 1 through 5 and confirm the vehicle barrier system will protect against the DBT vehicle bombs based upon the stand-off distance of the VBS.

References 1 through 5 are available for NRC inspection as part of the Unit 3 [Unit 4] ITAAC 2.6.09.06 Completion Package (Reference 6 [7]).

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-XV01-Z0C-001, "AP1000 Vehicle Barrier System Standoff Distances for a Range of Blast Scenarios" (Safeguards Information)
2. DOEJ-V34-LAR-18-008-SEC001, "Minimum Safe Standoff Distance (MSSD) Evaluation of the Transitional Vehicle Barrier System Between Plant Vogtle Units 3 & 4 With Respect to Equipment Required for Safe Shutdown, Equipment Required for Security Response, and Security Force Response Personnel" (Safeguards Information)
3. Document XXX, Unit 4 MSSD Site Specific Information (Safeguards Information)
4. Procedure XXX, Unit 3 Vehicle Barrier System Stand-off Distance Inspection Procedure (Safeguards Information)
5. Procedure XXX, Unit 4 Vehicle Barrier System Stand-off Distance Inspection Procedure (Safeguards Information)
6. 2.6.09.06-U3-CP-Rev0, ITAAC Completion Package
7. 2.6.09.06-U4-CP-Rev0, ITAAC Completion Package
8. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"