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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 2.1.03.07.i [Index Number 78]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of June 13, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.1.03.07.i [Index Number 78] 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 J. 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 2.1.03.07.i [Index Number 78]

MJY/PGL/amw

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Southern Nuclear Operating Company
ND-18-0709
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.1.03.07.i [Index Number 78]

ITAAC Statement

Design Commitment

7. The reactor internals will withstand the effects of flow induced vibration.

10. The reactor lower internals assembly is equipped with holders for at least eight capsules for storing material surveillance specimens.

Inspections/Tests/Analyses

i) A vibration type test will be conducted on the (first unit) reactor internals representative of AP1000.

ii) A pre-test inspection, a flow test and a post-test inspection will be conducted on the as-built reactor internals.

Inspection of the reactor lower internals assembly for the presence of capsules will be performed.

Acceptance Criteria

i) A report exists and concludes that the (first unit) reactor internals have no observable damage or loose parts as a result of the vibration type test.

ii) The as-built reactor internals have no observable damage or loose parts.

At least eight capsules are in the reactor lower internals assembly.

ITAAC Completion Description

This ITAAC requires that tests and inspections be performed and documented to ensure the reactor internals will withstand the effects of flow induced vibration and that the reactor lower internals assembly is equipped with holders for at least eight capsules for storing material surveillance specimens.

7.i) A report exists and concludes that the (first unit) reactor internals have no observable damage or loose parts as a result of the vibration type test.

A vibration type test is conducted on the first AP1000 unit (i.e., Unit 3) reactor vessel internals during the hot functional test (HFT). A post-HFT inspection of the internals is then performed to check for observable damage or loose parts. The inspection is documented on data sheets included in the inspection procedure (Reference 1), and concludes that the first unit reactor internals have no observable damage or loose parts as a result of the vibration type test.

This vibration type test and inspection are performed consistent with the guidelines of Regulatory Guide 1.20, Rev 2 as described in the Updated Final Safety Analysis Report (UFSAR) Section 3.9.2.4. Per UFSAR Section 14.2.9.1.9, this testing is required for the first plant only (Unit 3), therefore the Unit 3 inspection results (Reference 1) are used to close this portion of the ITAAC for Unit 4.

7.ii) The as-built reactor internals have no observable damage or loose parts.

A pre-HFT inspection is performed to document the initial condition of the reactor internals, including all major load-bearing elements that retain the position of the core support structure; lateral, vertical, and torsional restraints; locking and bolting components; contact surfaces; and the reactor vessel interior. Next, a flow test is conducted on the reactor vessel internals during the HFT. A post-HFT inspection is then performed on the reactor internals to check for observable damage or loose parts. These inspections are documented on data sheets included in the inspection procedures (References 1 and 2). The test and inspections, described in UFSAR Section 3.9.2.4, are performed consistent with the guidelines of Regulatory Guide 1.20, Rev 2.

The inspection results, as documented in the Unit 3 and Unit 4 inspection procedures (References 1 and 2), conclude the as-built reactor internals have no observable damage or loose parts.

10. At least eight capsules are in the reactor lower internals assembly.

An inspection of the reactor lower internals assembly is performed to confirm that at least eight material surveillance specimen capsules are installed in holders for that purpose, in accordance with the installation manuals (References 3 and 4). These inspections are documented on data sheets included in the inspection procedures (References 1 and 2).

The inspection results, as documented in the Unit 3 and Unit 4 inspection procedures (References 1 and 2), conclude that at least eight capsules are in the reactor lower internals assembly.

References 1 and 2 provide evidence that the ITAAC Acceptance Criteria requirements are met:

- A report exists and concludes that the (first unit) reactor internals have no observable damage or loose parts as a result of the vibration type test;
- The as-built reactor internals have no observable damage or loose parts; and
- At least eight capsules are in the reactor lower internals assembly.

References 1 through 4 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.1.03.07.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 findings pertaining to the subject ITAAC and associated corrective actions. This review, which included now-consolidated ITAAC Indexes 79 and 85, found there are no relevant ITAAC findings associated with this ITAAC.

References (available for NRC inspection)

1. 3-RXS-ITPP-501, "Pre- and Post-Hot Functional Test Inspection of Reactor Vessel Internals"

2. 4-RXS-ITPP-501, "Pre- and Post-Hot Functional Test Inspection of Reactor Vessel Internals"

3. SV3-MI01-Z0M-001, "AP1000 RVI Installation Requirements Manual"

4. SV4-MI01-Z0M-001, "AP1000 RVI Installation Requirements Manual"

5. 2.1.03.07.i-U3-CP-Rev0, ITAAC Completion Package

6. 2.1.03.07.i-U4-CP-Rev0, ITAAC Completion Package

7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"