Southern Nuclear

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

JUN 2 8 2018

Docket Nos.: 52-025
52-026

ND-18-0913
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 2.2.01.07.i [Index Number 107]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of June 25, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.01.07.i [Index Number 107] 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 L. 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 2.2.01.07.i [Index Number 107]

MJY/LBP/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. Coovert

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-18-0913
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.01.07.i [Index Number 107]

ITAAC Statement

Design Commitment

7. The CNS provides the safety-related function of containment isolation for containment boundary integrity and provides a barrier against the release of fission products to the atmosphere.

Inspections/Tests/Analyses

i) A containment integrated leak rate test will be performed.

Acceptance Criteria

i) The leakage rate from containment for the integrated leak rate test is less than L_a.

ITAAC Completion Description

Multiple ITAAC are performed to demonstrate that the Containment System (CNS) provides the safety-related function of containment isolation for containment boundary integrity and provides a barrier against the release of fission products to the atmosphere. The subject ITAAC performs a Type A containment integrated leak rate test (ILRT) to confirm that the leakage rate from containment is less than L_a. L_a is defined as the maximum allowable containment leakage as defined in 10 CFR 50 Appendix J.

ILRT is performed in accordance with Unit 3 and Unit 4 test procedures (Reference 1 and 2, respectively), to demonstrate that the leakage rate from containment is less than L_a. The testing is consistent with the applicable Type A testing guidance contained in ANSI/ANS-56.8-1994 (reference 3).

The ILRT tests include prerequisites that verify local leak rate testing (LLRT) is complete to support performance of the ILRT. Containment isolation valves are placed in their post-accident positions and closure is accomplished by normal operation and with no preliminary exercising or adjustments. Those portions of fluid systems that are part of the reactor coolant pressure boundary and are open directly to the containment atmosphere under post-accident conditions and become an extension of the boundary of the containment, are opened or vented to the containment atmosphere prior to and during the test. When required, portions of the systems inside containment that penetrate containment and could rupture as a result of a loss of coolant accident are vented to the containment atmosphere and drained of water to the extent necessary to provide exposure of the containment isolation valves to containment air test pressure and to allow them to be subjected to the full differential test pressure. Tanks inside the containment are vented to the containment atmosphere as necessary to protect them from the effects of external test pressure and/or to preclude leakage which could affect the accuracy of the test results. Similarly, instrumentation and other components that could be adversely affected by the test pressure are vented or removed from containment.

The containment is pressurized and time is allotted for outgassing. Containment pressure is then increased to full test pressure, allowed to stabilize and then the leak test is commenced. During the test, containment pressure, calculated mass, dry bulb temperature and dew-point temperature are recorded. After the required data is obtained a slow, monitored pressure

decrease is started and utilized to verify the accuracy of the leak rate data obtained during the ILRT.

The leakage rate from containment is corrected for measurement uncertainty and calculated utilizing the methodology described in ANSI/ANS-56.8-1994. The containment leakage rate for Unit 3 is 0.XX L_a and for Unit 4 is 0.YY L_a. The Unit 3 and Unit 4 completed IRLT tests (References 1 and 2, respectively) confirm the leakage rate from containment is less than L_a.

References 1 and 2 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.2.01.07.i Completion Packages (References 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. 3-CNS-ITPP-501, "Containment Integrated Leak Rate Test (Type A)"
2. 4-CNS-ITPP-501, "Containment Integrated Leak Rate Test (Type A)"
3. ANSI/ANS-56.8-1994, "Containment System Leakage Testing Requirements"
4. 2.2.01.07.i-U3-CP-Rev0, ITAAC Completion Package
5. 2.2.01.07.i-U4-CP-Rev0, ITAAC Completion Package
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"