

**Southern Nuclear Operating Company
ND-18-0814
Enclosure 3**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Docket No.: 52-025 & 52-026**

Completion Plan for Uncompleted ITAAC 3.3.00.07d.iv.b [Index Number 807]

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:

iv) Separation distances less than those specified above and not run in enclosed raceways or provided with barriers are based on analysis

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:

iv.b) For areas inside the non-radiologically controlled area of the auxiliary building, a report exists and concludes that separation distances less than those specified above and not provided with enclosed raceways or barriers have been analyzed.

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. In accordance with this ITAAC, separation distances for circuits that do not meet the criteria of ITAAC 3.3.00.07d.ii.b or ITAAC 3.3.00.07d.iii.b may be based on analyses. For circuits that have separation distances based on analyses, the subject ITAAC requires inspections to confirm that separation distances have been analyzed. The Class 1E cables and raceways and non-Class 1E cables inside the non-radiologically controlled area of the auxiliary building are designed to be appropriately separated in accordance with APP-GW-E1-001 (Reference 1). Installation specifications provided to the constructor identify 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:

For areas inside the non-radiologically controlled area of the auxiliary building, separation distances less than those specified above and not run in enclosed raceways or provided with barriers are based on analysis. The analyses performed for this ITAAC are performed in accordance with IEEE Standard 384, and demonstrate that the effects of lesser separation do not impact the ability of Class 1E circuits to perform their safety related functions.

Exceptions to the subject ITAAC are not included within the scope of this ITAAC and are addressed within the scope of ITAAC 3.3.00.07d.v.b (Enclosure 4).

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.iv.b 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, Bechtel Construction Quality Verification Program
3. Unit 3 Cable Separation Report XXX
4. Unit 4 Cable Separation Report XXX
5. 3.3.00.07d.iv.b-U3-CP-Rev0, ITAAC Completion Package
6. 3.3.00.07d.iv.b-U4-CP-Rev0, ITAAC Completion Package
7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"