

**JUL 13 2018**Docket Nos.: 52-025  
52-026ND-18-0775  
10 CFR 52.99(c)(3)U.S. Nuclear Regulatory Commission  
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Washington, DC 20555-0001

Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Unit 3 and Unit 4  
Resubmittal of Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load  
Item E.3.9.08.01.03 [Index Number 872]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of July 12, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item E.3.9.08.01.03 [Index Number 872] 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.

Southern Nuclear Operating Company (SNC) previously submitted Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load for Item E.3.9.08.01.03 [Index Number 872] ND-18-0637 [ML18131A244] dated May 11, 2018. This resubmittal supersedes ND-18-0637 in its entirety.

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 and Unit 4  
Completion Plan for Uncompleted ITAAC E.3.9.08.01.03 [Index Number 872]

MJY/LBP/amw

U.S. Nuclear Regulatory Commission

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**Southern Nuclear Operating Company  
ND-18-0775  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC E.3.9.08.01.03 [Index Number 872]**

## **ITAAC Statement**

### **Program Commitment**

8.1 The licensee conducts a partial participation exercise to evaluate portions of emergency response capabilities, which includes participation by each State and local agency within the plume exposure EPZ that have not been tested in a previous exercise. [N.1]

### **Inspections/Tests/Analyses**

8.1 A partial participation exercise (test) will be conducted within the specified time periods of 10 CFR Part 50, Appendix E.

### **Acceptance Criteria**

8.1.3 The exercise is completed within the specified time periods of Appendix E to 10 CFR Part 50, offsite exercise objectives have been met, and there are either no uncorrected offsite deficiencies, or a license condition requires offsite deficiencies to be corrected prior to operation above 5% of rated power.

## **ITAAC Completion Description**

Multiple ITAAC are performed to ensure that a partial participation exercise is conducted to evaluate portions of emergency response capabilities, which includes participation by each State and local agency within the plume exposure Emergency Planning Zone (EPZ) that have not been tested in a previous exercise. This ITAAC performs a partial participation exercise (test) to evaluate offsite portions of emergency response capabilities within the plume exposure EPZ that have not been tested in a previous exercise. This Vogtle Electric Generating Plant (VEGP) Unit 3 (Unit 4) partial participation exercise is conducted within the specified time periods of 10 CFR Part 50, Appendix E and confirms that offsite exercise objectives are met and there are either no uncorrected offsite (State and local agency) deficiencies, or a license condition requires offsite deficiencies to be corrected prior to operation above 5% of rated power. Offsite deficiencies as used in this ITAAC are considered to be Level 1 Findings, as defined in the Federal Emergency Management Agency's (FEMA's) January 2016 Program Manual – Radiological Emergency Preparedness (FEMA P-1028) (Reference 1), and as addressed in FEMA's May 15, 2015, Memorandum, "New Terms to Classify REPP Exercise-Related Observations and Issues" (Reference 2).

The VEGP Unit 3 (Unit 4) partial participation exercise is completed under the provisions of 10 CFR 50, Appendix E Section IV.F.2.a.(iii). Specifically, the partial participation exercise is conducted within two years of a full participation exercise at VEGP Units 1 and 2 as required by 10 CFR 50 Appendix E, Sections IV.F.2.b and IV.F.2.c, and within one year of VEGP Unit 3 (Unit 4) initial fuel load, as required by 10 CFR 50, Appendix E, Section IV.F.2.a.(ii). The VEGP Unit 3 (Unit 4) partial participation exercise scenario is of sufficient scope to require appropriate offsite authorities to actively take part in the exercise to test direction and control functions (i.e., (a) protective action decision making related to emergency action levels, and (b) communication capabilities among affected State and local authorities and the licensee) that were not previously evaluated by FEMA during the VEGP Units 1 and 2 full participation graded exercise.

The VEGP Unit 3 (Unit 4) exercise scenario, simulating a radiological release to the environment, is developed and conducted using procedure NMP-EP-303 (Reference 3). A

scenario review is conducted between FEMA, impacted States and Southern Nuclear Operating Company, as required by NMP-EP-303, to approve State and county (local) objectives for the exercise and define scenario requirements to meet these objectives. The scenario review is conducted approximately 4-5 months prior to the partial participation exercise and will focus on, but is not limited to, State and county exercise objectives that were not evaluated by FEMA as part of the VEGP Units 1 and 2 full participation graded exercise. If State and county (local) objectives are identified as requiring evaluation in the scenario review meeting discussed above, scenario-specific Unit 3 (Unit 4) offsite exercise objectives supporting these State and county (local) objectives are developed and finalized, using the guidance provided in procedure NMP-EP-303. If no offsite State and county (local) objectives are identified as requiring evaluation by FEMA in the Unit 3 (Unit 4) scenario review meeting, no offsite exercise objectives will be developed and this ITAAC will credit the results of the VEGP Units 1 and 2 FEMA After Action Report/Improvement Plan (Reference 4) for the VEGP Unit 3 (Unit 4) ITAAC Acceptance Criteria.

The VEGP Units 1 and 2 FEMA After Action Report/Improvement Plan documents State and local agency deficiencies identified by FEMA during the VEGP Units 1 and 2 full participation graded exercise. Resolution of open deficiencies by the State and county (local) agencies are tracked in the VEGP Corrective Action Program.

State and county (local) objectives (if any) approved in the scenario review meeting discussed above are evaluated by FEMA and documented in a VEGP Unit 3 (Unit 4) FEMA After Action Report/Improvement Plan (Reference 5). Resolution of open deficiencies by the State and county (local) agencies are tracked in the VEGP Corrective Action Program. If no offsite State and county (local) objectives are identified as requiring evaluation by FEMA in the Unit 3 (Unit 4) scenario review meeting there will not be a VEGP Unit 3 (Unit 4) FEMA After Action Report/Improvement Plan.

An evaluation of the Unit 3 (Unit 4) partial participation exercise performance is conducted per procedure NMP-EP-303 to confirm that the offsite exercise objectives necessary to support offsite State and county (local) objectives approved in the scenario review meeting discussed above are met. The exercise performance (test) results are documented in Unit 3 (Unit 4) Drill/Exercise Report XXX (Reference 6) per procedure NMP-EP-303. The Drill/Exercise Report documents and confirms that VEGP Unit 3 (Unit 4) offsite exercise objectives necessary to support offsite State and county (local) objectives approved in the scenario review meeting are met. If no offsite State and county (local) objectives are identified as requiring evaluation by FEMA in the Unit 3 (Unit 4) scenario review meeting there will be no VEGP Unit 3 (Unit 4) offsite exercise objective discussion in the partial participation exercise Drill/Exercise Report.

Documentation that the VEGP Unit 3 (Unit 4) partial participation exercise is conducted within two years of a full participation exercise at VEGP Units 1 and 2 as required by 10 CFR 50 Appendix E, Sections IV.F.2.b and IV.F.2.c, and within one year of VEGP Unit 3 (Unit 4) initial fuel load, as required by 10 CFR 50, Appendix E, Section IV.F.2.a.(ii) is contained in the Unit 3 (Unit 4) Drill/Exercise Report XXX. This confirms that the VEGP Unit 3 (Unit 4) partial participation exercise is completed within the specified time periods of Appendix E to 10 CFR Part 50.

Resolution of the open State and county (local) deficiencies identified in the VEGP Units 1 and 2 FEMA After Action Report/Improvement Plan and the VEGP Unit 3 (Unit 4) FEMA After Action

Report/Improvement Plan (if required) are documented in the VEGP Unit 3 (Unit 4) After Action Report/Improvement Plan Closure Report (Reference 7).

If no uncorrected offsite deficiencies remain from the VEGP Units 1 and 2 FEMA After Action Report/Improvement Plan and the VEGP Unit 3 (Unit 4) FEMA After Action Report/Improvement Plan (if required) at the time the Unit 3 (Unit 4) ITAAC E.3.9.08.01.02 02 Principle Closure Documents are prepared, a license condition requiring offsite deficiencies to be corrected prior to operation above 5% of rated power is not required.

If uncorrected offsite deficiencies remain from the VEGP Units 1 and 2 FEMA After Action Report/Improvement Plan and the VEGP Unit 3 (Unit 4) FEMA After Action Report/Improvement Plan (if required) at the time the Unit 3 (Unit 4) ITAAC E.3.9.08.01.02 Principle Closure Documents are prepared, a license amendment request will be submitted requesting a license condition requiring the offsite deficiencies be corrected prior to operation above 5% of rated power.

References 1 through 7 are available for NRC inspection as part of the Unit 3 (Unit 4) ITAAC E.3.9.08.01.02 Completion Packages (References 8 and 9).

### **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. FEMA P-1028, Federal Emergency Management Agency (FEMA) Radiological Emergency Preparedness Program, January 2016
2. A. Mitchell, May 15, 2015, "New Terms to Classify REPP Exercise-Related Observations and Issues" [Memorandum], FEMA
3. Procedure NMP-EP-303, Drill and Exercise Standards
4. VEGP Units 1 and 2 FEMA After Action Report/Improvement Plan
5. VEGP Unit 3 (Unit 4) FEMA After Action Report/Improvement Plan
6. Unit 3 (Unit 4) Drill/Exercise Report XXX
7. VEGP Unit 3 (Unit 4) After Action Report/Improvement Plan Closure Report
8. E.3.9.08.01.03-U3-CP-Rev0, ITAAC Completion Package
9. E.3.9.08.01.03-U4-CP-Rev0, ITAAC Completion Package
10. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"