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52-026ND-18-0939
10 CFR 52.99(c)(3)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 2.1.02.08d.ii [Index Number 33]

Ladies and Gentlemen:

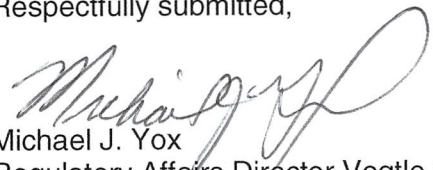
Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of July 17, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.1.02.08d.ii [Index Number 33] has not been completed 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 & 4Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.1.02.08d.ii [Index Number 33]

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**Southern Nuclear Operating Company
ND-18-0939
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.1.02.08d.ii [Index Number 33]**

ITAAC Statement

Design Commitment:

8.d) The RCS provides automatic depressurization during design basis events.

Inspections, Tests, Analyses:

ii) Inspections and associated analysis of each fourth-stage ADS sub-loop (four valves and associated piping connected to each hot leg) will be conducted to verify the line routing is consistent with the line routing used for design flow resistance calculations.

Acceptance Criteria:

ii) The calculated flow resistance for each fourth-stage ADS sub-loop valves and piping is:

Loop 1:

Sub-loop A: $\leq 5.91 \times 10^{-7}$ ft/gpm²

Sub-loop C: $\leq 6.21 \times 10^{-7}$ ft/gpm²

Loop 2:

Sub-loop B: $\leq 4.65 \times 10^{-7}$ ft/gpm²

Sub-loop D: $\leq 6.20 \times 10^{-7}$ ft/gpm²

ITAAC Completion Description

Multiple ITAAC are performed to demonstrate the Reactor Coolant System (RCS) provides automatic depressurization during design basis events. This ITAAC performs inspections and analysis of each fourth stage Automatic Depressurization System (ADS) sub-loop (four valves and associated piping connected to each hot leg) to verify the line routing is consistent with the line routing used for design flow resistance calculations.

A flow resistance is calculated with Darcy's formula for each of the fourth stage ADS sub-loops flow paths A, B, C, and D using line routing information (i.e., pipe length, pipe diameter, number and type of pipe fittings, entrance/exit losses, and valves) (Reference 1). Following installation, an inspection of each sub-loop's as-built construction records are performed to verify the line routing information from the hot leg of the RCS to the discharge of the fourth-stage squib valves remains consistent with the information in the flow resistance design calculation. The results are used to calculate the as-built flow resistance for each sub-loop using the same methodology used in the flow resistance design calculation and compared to the ITAAC acceptance criteria (References 2 and 3).

The results are documented in the Unit 3 and Unit 4 Principal Closure Document (Reference 2 and 3, respectively) and shown in the Attachment which demonstrates the ITAAC acceptance criteria is met.

References 1 thru 3 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.1.02.08d.ii Completion Packages (Reference 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. APP-PXS-M3C-019, Revision 5, "IRWST / Containment Sump Injection Lines and ADS Line Resistances"
2. Principal Closure Document (Unit 3)
3. Principal Closure Document (Unit 4)
4. 2.1.02.08d.ii-U3-CP-Rev0, ITAAC Completion Package
5. 2.1.02.08d.ii-U4-CP-Rev0, ITAAC Completion Package
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52"

Attachment

Fourth Stage ADS Loop Flow Resistance

Loop	Fourth-stage Squib valve Tag No.*	Calculated As-built Flow Resistance⁺ (ft/gpm²)	ITAAC Acceptance Criteria (ft/gpm²)
Sub-loop A	RCS-PL-V004A		$\leq 5.91 \times 10^{-7}$
Sub-loop B	RCS-PL-V004B		$\leq 4.65 \times 10^{-7}$
Sub-loop C	RCS-PL-V004C		$\leq 6.21 \times 10^{-7}$
Sub-loop D	RCS-PL-V004D		$\leq 6.20 \times 10^{-7}$

* Excerpt from COL App C Table 2.1.2-1

+ Results are Unit specific