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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  
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load  
Item 2.6.09.08 [Index Number 650]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of July 20, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.6.09.08 [Index Number 650] 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 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 & Unit 4  
Completion Plan for Uncompleted ITAAC 2.6.09.08 [Index Number 650]

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**Southern Nuclear Operating Company  
ND-18-0807  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 & Unit 4  
Completion Plan for Uncompleted ITAAC 2.6.09.08 [Index Number 650]**

## **ITAAC Statement**

### **Design Commitment**

8. Isolation zones and exterior areas within the protected area are provided with illumination to permit observation of abnormal presence or activity of persons or vehicles.

### **Inspections, Tests, Analyses**

Inspection of the illumination in the isolation zones and external areas of the protected area will be performed.

### **Acceptance Criteria**

The illumination in isolation zones and exterior areas within the protected area is 0.2 foot candles measured horizontally at ground level or, alternatively, sufficient to permit observation.

## **ITAAC Completion Description**

An inspection is performed to verify the Vogtle Electric Generating Plant (VEGP) Unit 3 [Unit 4] isolation zones and exterior areas within the protected area are provided with illumination to permit observation of abnormal presence or activity of persons or vehicles. The inspection confirms the illumination in isolation zones and external areas within the protected area is a minimum of 0.2 foot candles measured horizontally at ground level or, alternatively, sufficient to permit observation, and satisfy the applicable illumination requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR 73.55(i)(6)(ii). The VEGP Unit 3 [Unit 4] Plant Security System ITAACs only cover the Unit 3 [Unit 4] plant security system design commitment scope.

Procedure XXX, Unit 3 [Unit 4] Isolation Zone and Protected Area Lighting System Inspection, (Reference 1 [2]) measures the illumination in isolation zones and exterior areas within the protected area. The measurements are taken horizontally at ground level with a calibrated light meter during clear weather conditions at night with no full moon. Ground level is considered to be approximately 6 inches above the ground or surface being tested.

The VEGP Unit 3 [Unit 4] isolation zones and exterior areas of the protected area are divided into grid sections. Measurement of illumination levels in each section are taken at locations determined by Procedure XXX. Procedure criteria for selecting the measurement locations in each section include points on the extreme boundary of the section being measured, midpoints between the outdoor security lighting luminaries, corners at the intersection of exterior building walls, isolation zone corners, exterior area access doors to vital areas, and other external areas within the protected area and isolation zone areas of apparent low light within the section.

The results of the Unit 3 [Unit 4] isolation zone and protected area lighting system inspection are documented in Inspection Report YYY, Unit 3 [Unit 4] Isolation Zone and Protected Area Lighting System Inspection Report (Reference 3 [4]) and confirm that the illumination in isolation zones and exterior areas within the protected area is a minimum of 0.2 foot candles measured horizontally at ground level or, alternatively, sufficient to permit observation of abnormal presence or activity of persons or vehicles, utilizing low-light technologies referenced in the VEGP Unit 3 and Unit 4 Physical Security Plan.

References 1 and 3 [2 and 4] are available for NRC inspection as part of the ITAAC 2.6.09.08 Completion Package (Reference 5 [6]).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found that there are no relevant ITAAC findings associated with this ITAAC.

### **References (available for NRC inspection)**

1. Procedure XXX, Unit 3 Isolation Zone and Protected Area Lighting System Inspection
2. Procedure XXX, Unit 4 Isolation Zone and Protected Area Lighting System Inspection
3. Inspection Report YYY, Unit 3 Isolation Zone and Protected Area Lighting System Inspection Report
4. Inspection Report YYY, Unit 4 Isolation Zone and Protected Area Lighting System Inspection Report
5. 2.6.09.08-U3-CP-Rev0, ITAAC Completion Package
6. 2.6.09.08-U4-CP-Rev0, ITAAC Completion Package
7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"