



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

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U.S. Nuclear Regulatory Commission
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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3 and Unit 4
ITAAC Closure Notification on Completion of ITAAC 2.2.05.07a.ii [Index Number 266]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.05.07a.ii [Index Number 266] for verifying the Main Control Room Emergency Habitability System Air Storage Volume. The closure process for this ITAAC is based on 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.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Tom Petrak at 706-848-1575.

Respectfully submitted,

Amanda Pugh for Michael J. Yox

Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion of ITAAC 2.2.05.07a.ii [Index Number 266]

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To:

Southern Nuclear Operating Company/ Georgia Power Company

Mr. D. A. Bost (w/o enclosures)

Mr. D. L. McKinney (w/o enclosures)

Mr. M. D. Meier (w/o enclosures)

Mr. D. H. Jones (w/o enclosures)

Mr. J. B. Klecha

Mr. G. Chick

Mr. M. J. Yox

Mr. A. S. Parton

Ms. A. L. Pugh

Mr. T. G. Petrak

Mr. W. A. Sparkman

Mr. C. T. Defnall

Mr. C. E. Morrow

Mr. J. L. Hughes

Ms. K. M. Stacy

Ms. A. C. Chamberlain

Mr. C. T. Defnall

Mr. J. C. Haswell

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cc:

Nuclear Regulatory Commission

Mr. W. Jones (w/o enclosures)

Mr. F. D. Brown

Ms. J. M. Heisserer

Ms. A. E. Rivera-Varona

Mr. M. E. Ernstes

Mr. C. P. Patel

Mr. G. J. Khouri

Ms. S. E. Temple

Mr. N. D. Karlovich

Mr. A. J. Lerch

Mr. C. J. Even

Mr. B. J. Kemker

Ms. N. C. Coover

Oglethorpe Power Corporation

Mr. R. B. Brinkman

Mr. E. Rasmussen

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

Ms. J. Monahan

Mr. J. L. Coward

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*

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**Southern Nuclear Operating Company
ND-18-0696
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion of ITAAC 2.2.05.07a.ii [Index Number 266]**

ITAAC Statement

Design Commitment

7.a) The VES provides a 72-hour supply of breathable quality air for the occupants of the MCR.

Inspections/Tests/Analyses

ii) Analysis of storage capacity will be performed based on manufacturers data.

Acceptance Criteria

ii) The calculated storage capacity is greater than or equal to 327,574 scf.

ITAAC Determination Basis

Multiple ITAAC are performed to demonstrate that the Main Control Room Emergency Habitability System (VES) provides a 72-hour supply of breathable quality air for the occupants of the Main Control Room (MCR). This ITAAC requires an analysis be performed using manufacturers data to demonstrate that the capacity of the VES emergency air storage tanks is greater than or equal to 327,574 standard cubic feet (scf).

After fabrication, the free volume of the 32 emergency air storage tanks for each Unit 3 and Unit 4 were measured by the manufacturer. To calculate the free volume of each tank, the manufacturer determined the weight of each air storage tank when empty and when filled with water using a scale. The weight of the empty air storage tank was subtracted from the weight of the water-filled air storage tank to determine the weight of the water within the contained volume of each air storage tank. The water weight was converted to volume using the density of water, compensated for temperature at the time of measurement. The total free volume in cubic feet for each Units' 32 tanks is the summation of the individual tanks' free volume. The total storage capacity in scf of air is calculated by converting the total free volume of compressed air at the bounding temperature and pressure conditions to an expanded volume in scf at standard pressure and temperature conditions.

The results of the analysis are documented in the Vogtle Units 3 & 4 Air Tanks Volume Calculations (Reference 1). The results verify the total calculated storage capacity of the VES emergency air storage tanks is 328,086 scf for Unit 3 and 327,997 scf for Unit 4 which meet the ITAAC acceptance criteria.

Reference 1 is available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.2.05.07a.ii Completion Packages (References 3 and 4, respectively).

ITAAC Finding Review

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 these ITAAC. The ITAAC completion review is documented in the ITAAC Completion Packages for ITAAC 2.2.05.07a.ii for Unit 3 and Unit 4 (References 2 and 3 respectively) and are available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.2.05.07a.ii was performed for VEGP Unit 3 and Unit 4 and that the prescribed acceptance criteria were met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. SV0-MS23-VDR-001, Revision 0 "Vogtle Units 3 & 4 Air Tanks Volume Calculations"
2. 2.2.05.07a.ii-U3-CP-Rev 0, "Completion Package for the Unit 3 ITAAC 2.2.05.07a.ii [Index number 266]"
3. 2.2.05.07a.ii-U4-CP-Rev 0, "Completion Package for the Unit 4 ITAAC 2.2.05.07a.ii [Index number 266]"