

SEP 2 4 2018

Docket Nos.: 52-025

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ND-18-1208 10 CFR 52.99(c)(1)

U.S. Nuclear Regulatory Commission Document Control Desk Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
ITAAC Closure Notification on Completion of ITAAC 2.2.03.08c.v.01 [Index Number 187]

#### 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 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.03.08c.v.01 [Index Number 187] for verifying that the elevation of the bottom inside tank surface of the Core Makeup Tanks (CMTs) is higher than the direct vessel injection nozzle centerlines by greater than or equal to 7.5 ft. 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,

Michael J. Yox

Regulatory Affairs Director Vogtle 3 & 4

Enclosure:

Vogtle Electric Generating Plant (VEGP) Unit 3

Completion of ITAAC 2.2.03.08c.v.01 [Index Number 187]

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## Southern Nuclear Operating Company ND-18-1208 Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 2.2.03.08c.v.01 [Index Number 187]

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### **ITAAC Statement**

### **Design Commitment**

8.c) The PXS provides RCS makeup, boration, and safety injection during design basis events.

#### Inspections/Tests/Analyses

- v) Inspections of the elevation of the following tanks will be conducted:
  - 1. CMTs

#### Acceptance Criteria

- v) The elevation of the bottom inside tank surface is higher than the direct vessel injection nozzle centerline by the following:
  - 1. CMTs ≥ 7.5 ft

### **ITAAC Determination Basis**

Multiple ITAAC are performed to demonstrate that the Passive Core Cooling System (PXS) provides Reactor Coolant System (RCS) makeup, boration, and safety injection during design basis events. This ITAAC requires that inspections be conducted to verify that the elevation of the Core Makeup Tanks (CMTs) bottom inside tank surface is higher than the direct vessel injection nozzle centerline by  $\geq 7.5$  ft.

The inspection of the bottom inside tank surface of both CMTs (SV3-PXS-MT-02A and -02B) and their associated direct vessel injection nozzle centerlines was performed using survey equipment in accordance with site survey and measurement procedures (Reference 1). Additionally, calculations, based upon as-built manufacturer's data, combined with field measurements were used to determine the elevation of the bottom inside surfaces of each tank. The derived elevation of the bottom inside tank surface of each CMT was compared to the measured elevation of their associated direct vessel injection nozzle centerline using a common reference point.

The inspection results are documented in Reference 2. The results determined that the elevation of the bottom inside tank surface of CMT SV3-PXS-MT-02A and SV3-PXS-MT-02B is 107.09 feet and 107.13 feet, respectively and the elevation of their associated direct vessel injection nozzle centerlines is 99.58 feet and 99.57 feet, respectively. These inspection results verify that the elevation of the bottom inside tank surface of CMT SV3-PXS-MT-02A and -02B is 7.5 ft and 7.6 ft higher than the elevation of their associated respective direct vessel injection nozzle centerlines, which meets the ITAAC acceptance criteria.

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#### **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 this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.2.03.08c.iv.01 (Reference 3) and available for NRC review.

## **ITAAC Completion Statement**

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.2.03.08c.v.01 was performed for VEGP Unit 3 and that the prescribed acceptance criteria are 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. 26139-000-4MP-T81C-N3201 Vogtle Units 3 and 4 Construction Completion Project Construction Survey
- 2. SV3-PXS-MTK-892047 Rev 2, "CMT's Bottom Inside Tank Surface Comparison to DVI Nozzle Centerline Elevation"
- 3. 2.2.03.08c.v.01-U3-CP-Rev 0, ITAAC Completion Package