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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 2.3.08.02.iii [Index Number 417]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of November 20, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspection, Test, Analyses, and Acceptance Criteria (ITAAC) Item 2.3.08.02.iii [Index Number 417] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.3.08.02.iii [Index Number 417]. 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 2.3.08.02.iii [Index Number 417] ND-17-1231 [ML 17214A778] dated July 31, 2017. This resubmittal supersedes ND-17-1231 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)(3) 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

U.S. Nuclear Regulatory Commission

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Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.3.08.02.iii [Index Number 417]

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**Southern Nuclear Operating Company
ND-18-1371
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.3.08.02.iii [Index Number 417]**

ITAAC Statement

Design Commitment

2. The SWS provides the nonsafety-related function of transferring heat from the component cooling water system to the surrounding atmosphere to support plant shutdown and spent fuel pool cooling.

Inspections/Tests/Analyses

iii) Testing will be performed to confirm that the SWS cooling tower basin has adequate reserve volume.

Acceptance Criteria

iii) The SWS tower basin contains a usable volume of at least 230,000 gallons at the basin low level alarm setpoint.

ITAAC Completion Description

Multiple ITAAC are performed to verify that the Service Water System (SWS) provides the nonsafety-related function of transferring heat from the Component Cooling Water System (CCS) to the surrounding atmosphere to support plant shutdown and spent fuel pool cooling. The subject ITAAC requires testing be performed to confirm that the SWS cooling tower basin contains useable volume of at least 230,000 gallons at the basin low level alarm setpoint.

Testing is performed in accordance with Unit 3 and Unit 4 preoperational test procedures 3-SWS-ITPP-501 and 4-SWS-ITPP-501 (References 1 and 2, respectively) to confirm that the SWS pumps will operate to provide required flow and pressure at the low-2 alarm setpoint in the SWS cooling tower basin. The usable volume is defined as the volume contained between the low level alarm setpoint (low-1) and the lowest usable level alarm setpoint (low-2). As part of the test procedure, the as-built dimensions of the basin and all structural components that reduce the useable volume, are measured. The as-built dimensions along with the appropriate measurement uncertainty are used to determine the basin volume.

The preoperational test ensures the SWS is in a normal system alignment with the cooling tower basin divider open and makeup water isolated. The cooling tower basin level is lowered to the low-2 setpoint and both SWS pumps are verified to provide the proper pressure and flow. The usable volume of the basin is calculated by measuring the as-built dimensions of the basin between the low-1 and low-2 setpoints and subtracting the as-built volume of the structural components inside the basin. The results of the volume calculation and the SWS pump testing demonstrate the Unit 3 SWS cooling tower basin contains XXXXXX usable gallons at the low-1 setpoint and Unit 4 SWS cooling tower basin contains XXXXXX usable gallons at the low-1 setpoint.

The Unit 3 and Unit 4 preoperational test results (References 1 and 2) confirm that the SWS cooling tower basin contains a usable volume of at least 230,000 gallons at the basin low level alarm setpoint.

References 1 and 2 are available for NRC inspection as part of the ITAAC 2.3.08.02.iii Completion Package (Reference 3).

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. 3-SWS-ITPP-501, "Service Water System Preoperational Test"
2. 4-SWS-ITPP-501, "Service Water System Preoperational Test"
3. ITAAC 2.3.08.02.iii Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"