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Docket Nos.: 52-025
52-026ND-18-1469
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 2.3.04.04.ii [Index Number 331]

Ladies and Gentlemen:

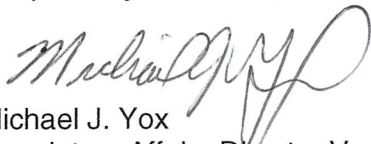
Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of November 26, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspection, Test, Analyses, and Acceptance Criteria (ITAAC) Item 2.3.04.04.ii [Index Number 331] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.3.04.04.ii [Index Number 331]. 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)(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

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Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.3.04.04.ii [Index Number 331]

MJY/DLW/sfr

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**Southern Nuclear Operating Company
ND-18-1469
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.3.04.04.ii [Index Number 331]**

ITAAC Statement

Design Commitment

4. The FPS provides for manual fire fighting capability in plant areas containing safety-related equipment.

Inspections/Tests/Analyses

ii) Testing will be performed by measuring the water flow rate as it is simultaneously discharged from the two highest fire-hose stations and when the water for the fire is supplied from the PCS storage tank.

Acceptance Criteria

ii) Water is simultaneously discharged from each of the two highest fire-hose stations in plant areas containing safety-related equipment at not less than 75 gpm.

ITAAC Completion Description

Multiple ITAAC are performed to demonstrate the Fire Protection System (FPS) provides for manual fire fighting capability in plant areas containing safety-related equipment. This ITAAC requires that testing will be performed by measuring the water flow rate as it is simultaneously discharged from the two highest fire-hose stations and when the water for the fire is supplied from the Passive Containment Cooling System (PCS) storage tank.

Testing is performed in accordance with Unit 3 and Unit 4 preoperational test 3-PCS-ITPP-502 and 4-PCS-ITPP-502, (References 1 and 2), to confirm that when the water for the FPS is supplied from the PCS storage tank, water is simultaneously discharged from each of the two highest fire-hose stations in plant areas containing safety-related equipment at not less than 75 gallons per minute (gpm). The 2 highest fire-hose stations in plant areas containing safety-related equipment was determined to be F151A (room 12506) and F151B (room 12504). The flow measurement can be performed at any level above the PCCWST technical specification minimum since the level in the tank will have negligible impact on gravity flow. There is a 1.1 foot elevation difference between the maximum PCCWST level and the technical specification minimum and a 187 foot elevation difference between the maximum PCCWST level and the highest fire-hose stations. The fire protection system is aligned to isolate the normal fire protection from the tested fire hose stations and the PCS storage tank is aligned to provide water to the fire-hose stations being tested. Ultrasonic flow instruments are installed upstream of the fire-hose stations and the fire hose is run and secured to a suitable drain. The fire-hose station isolation valves are opened, flow is monitored at each flow instrument and recorded approximately every 10 seconds and 30 readings are taken. The flow readings are corrected for measurement uncertainty and compared to the acceptance criteria. The flow for Unit 3 F151A is XX gpm and YY gpm for Unit 3 F151B. The flow for Unit 4 F151A is XX gpm and YY gpm for F151B. The completed Unit 3 and Unit 4 Preoperational Test Results, references 1 and 2, confirm that water is simultaneously discharged from each of the two highest fire-hose stations in plant areas containing safety-related equipment at not less than 75 gpm.

References 1 and 2 are available for NRC inspection as part of the ITAAC 2.3.04.04.ii Completion Packages (References 3 & 4).

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-PCS-ITPP-502, "Passive Containment Cooling System PCCWST Preoperational Test Procedure"
2. 4-PCS-ITPP-502, "Passive Containment Cooling System PCCWST Preoperational Test Procedure"
3. 2.3.04.04.ii-U3-CP-Rev0, ITAAC Completion Package
4. 2.3.04.04.ii-U4-CP-Rev0, ITAAC Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

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2. The information contained in this document is classified as [redacted] and is exempt from automatic downgrading and declassification.

3. The information contained in this document is classified as [redacted] and is exempt from automatic downgrading and declassification. This information is being provided to you for your information only and should not be disseminated to other personnel.

4.