



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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Docket Nos.: 52-025
52-026

ND-19-0109
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission
Document Control Desk
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 2.7.03.01 [Index Number 707]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of February 4, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.7.03.01 [Index Number 707] 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.

Southern Nuclear Operating Company (SNC) previously submitted, via letter ND-16-1866 [ML16278A387], a Unit 3 Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load for Item 2.7.03.01 [Index Number 707]. This resubmittal supersedes the previous Unit 3 notice 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)(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.



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

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael J. Yox".

Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.7.03.01 [Index Number 707]

MJY/GDL/sfr

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. K. A. Roberts
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. J. C. Haswell
Document Services RTYPE: VND.LI.L06
File AR.01.02.06

cc:

Nuclear Regulatory Commission

Mr. W. Jones (w/o enclosures)
Mr. F. D. Brown
Ms. J. M. Heisserer
Mr. C. P. Patel
Mr. G. J. Khouri
Ms. S. E. Temple
Mr. N. D. Karlovich
Mr. A. Lerch
Mr. C. J. Even
Mr. B. J. Kemker
Ms. N. C. Coovert
Mr. C. Welch
Mr. I. Cozens
Mr. J. Gaslevic
Mr. V. Hall

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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**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.7.03.01 [Index Number 707]**

ITAAC Statement

Design Commitment

1. The functional arrangement of the VXS is as described in the Design Description of this Section 2.7.3.

Inspections/Tests/Analyses

Inspection of the as-built system will be performed.

Acceptance Criteria

The as-built VXS conforms with the functional arrangement described in the Design Description of this Section 2.7.3.

ITAAC Completion Description

An inspection of the as-built annex/auxiliary buildings nonradioactive HVAC system (VXS) is conducted after completion of construction to confirm the functional arrangement of the VXS is as described in the Design Description of Combined License (COL) Appendix C Section 2.7.3. This inspection encompasses the structures, systems, and components (SSCs) identified in the COL Appendix C Section 2.7.3, Design Description, including those in Figure 2.7.3-1 and Table 2.7.3-3.

The inspection (walkdown) is completed in accordance with ND-RA-001-012, Functional Arrangement Scoping Process (Reference 1), which requires the preparation of a detailed inspection plan. This inspection plan includes the use of detailed drawings such as Piping and Instrumentation Drawings (P&IDs) or Single Line Elementary Drawings to perform visual observations and compare the as-built system to the Design Description.

The inspection results are documented in the Unit 3 and Unit 4 Principal Closure Documents XXX and YYY (References 2 and 3, respectively) supporting the Unit 3 and Unit 4 ITAAC 2.7.03.01 Completion Packages (References 4 and 5, respectively) and verify the SSCs are physically arranged and located to perform the functions described in the Design Description and referenced figure and table. The inspection results confirm that the as-built VXS conforms with the functional arrangement as described in the COL Appendix C Section 2.7.3, Design Description.

The Unit 3 and Unit 4 Principal Closure Documents XXX and YYY are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.7.03.01 Completion Packages.

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. ND-RA-001-012 Version 2.1, "Functional Arrangement Scoping Process"
2. Principal Closure Document XXX (Unit 3)

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3. Principal Closure Document YYY (Unit 4)
4. ITAAC 2.7.03.01 Completion Package (Unit 3)
5. ITAAC 2.7.03.01 Completion Package (Unit 4)
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"