Southern Nuclear

FEB 0 8 2019

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

Docket Nos.: 52-025
52-026

ND-18-1590
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 2.2.02.07f.i [Index Number 145]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of January 22, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections Tests Analyses and Acceptance Criteria (ITAAC) Item 2.2.02.07f.i [Index Number 145] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.2.02.07f.i [Index Number 145]. 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

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.02.07f.i [Index Number 145]

MJY/DLW/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
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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*

Southern Nuclear Operating Company
ND-18-1590
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.02.07f.i [Index Number 145]

ITAAC Statement

Design Commitment

7.f) The PCS provides a flow path for long-term water makeup from the PCCWST to the spent fuel pool.

8.b) The PCS delivers water from the PCCAWST to the PCCWST and spent fuel pool simultaneously.

Inspections/Tests/Analyses

i) Testing will be performed to measure the delivery rate from the PCCWST to the spent fuel pool.

Testing will be performed to measure the delivery rate from the PCCAWST to the PCCWST and spent fuel pool simultaneously.

Acceptance Criteria

i) With the PCCWST water level at 27.4 ft + 0.2, - 0.0 ft above the bottom of the tank, the flow path from the PCCWST to the spent fuel pool delivers greater than or equal to 118 gpm.

With PCCAWST aligned to the suction of the recirculation pumps, each pump delivers greater than or equal to 100 gpm to the PCCWST and 35 gpm to the spent fuel pool simultaneously when each pump is tested separately.

ITAAC Completion Description

Multiple ITAAC are performed to verify that the Passive Containment Cooling System (PCS) provides a flow path for long-term water makeup from the Passive Containment Cooling Water Storage Tank (PCCWST) to the spent fuel pool (SFP) and that the PCS delivers water from the Passive Containment Cooling Ancillary Water Storage Tank (PCCAWST) to the PCCWST and spent fuel pool simultaneously. Testing is performed to measure the delivery rate from the PCCWST to the spent fuel pool and the delivery rate from the PCCAWST, aligned to the recirculation pumps, to the PCCWST and spent fuel pool simultaneously.

i) With the PCCWST water level at 27.4 ft + 0.2, - 0.0 ft above the bottom of the tank, the flow path from the PCCWST to the spent fuel pool delivers greater than or equal to 118 gpm.

Testing is performed in accordance with Unit 3 and Unit 4 preoperational test procedures 3-PCS-ITPP-502, 4-PCS-ITPP-502, 3-SFS-ITPP-503, and 4-SFS-ITPP-503 (References 1 through 4) to verify that the flow path from the PCCWST to the spent fuel pool delivers greater than or equal to 118 gpm with the PCCWST water level at 27.4 ft + 0.2, - 0.0 ft above the bottom of the tank. The delivery rate from the PCCWST to the spent fuel pool is measured with the testing performed in two parts due to the construction and testing schedule and the very late completion of the PCCWST. During Spent Fuel Pool Cooling System (SFS) testing, flow is established with a temporary pump to provide flow into the PCCAWST supply lines at greater than or equal to 118 gpm to the spent fuel pool. The system flow and the system backpressure are measured. During PCS testing, a temporary valve and line are installed to direct the flow

from the PCCWST to the waste system instead of delivering the flow to the spent fuel pool. The PCCWST water level is verified to be at 27.4 ft + 0.2, -0.0 above the bottom of the tank, flow is initiated to establish a back pressure equal to the pressure measured during the SFS testing. The pressure and flow are monitored and verified to provide greater than or equal to 118 gpm with the same pressure provided during the SFS testing. The Unit 3 PCCWST provides XXX gpm and Unit 4 provides YYY gpm and demonstrates with the PCCWST water level at 27.4 ft + 0.2, - 0.0 ft above the bottom of the tank, the flow path from the PCCWST to the spent fuel pool delivers greater than or equal to 118 gpm.

With PCCAWST aligned to the suction of the recirculation pumps, each pump delivers greater than or equal to 100 gpm to the PCCWST and 35 gpm to the spent fuel pool simultaneously when each pump is tested separately.

Testing is performed in accordance with Unit 3 and Unit 4 preoperational test procedures 3-PCS-ITPP-502, 4-PCS-ITPP-502, 3-SFS-ITPP-503, and 4-SFS-ITPP-503 (References 1 through 4) to verify that with PCCAWST aligned to the suction of the recirculation pumps, each pump delivers greater than or equal to 100 gpm to the PCCWST and 35 gpm to the spent fuel pool simultaneously when each pump is tested separately. The delivery rate from the PCCAWST to the PCCWST and SFP are measured simultaneously, with testing performed in two parts due to the construction and testing schedule and the very late completion of the PCCWST. During SFS testing, flow is established at greater than or equal to 35 gpm from a temporary pump providing flow to the SFP and the system backpressure is measured. During PCS testing, a temporary valve and line are installed to direct the flow from the PCCAWST to the waste system instead of delivering the flow to the spent fuel pool. The PCCAWST is aligned to the suction of the recirculation pumps and flow is initiated to the PCCWST and the SFP simultaneously. The flow to the SFP is throttled to provide the same pressure as recorded during the SFS testing and flow is verified to be greater than or equal to 35 gpm. The flow to the PCCWST is monitored at the same time and verified to be greater than or equal to 100 gpm. Each pump is tested separately, and measurements verify that Unit 3 pump A delivers XXX gpm to the PCCWST flow path while simultaneously delivering XX gpm to SFP. The Unit 3 pump B delivers XXX gpm to the PCCWST flow path while simultaneously delivering XX gpm to the SFP flow path. Unit 4 pump A delivers XXX gpm to the PCCWST flow path while simultaneously delivering XX gpm to the SFP flow path. The Unit 4 pump B delivers XXX gpm to the PCCWST flow path while simultaneously delivering XX gpm to the SFP flow path. The results of the testing confirm that with the PCCAWST aligned to the suction of the recirculation pumps, each pump delivers greater than or equal to 100 gpm to the PCCWST flow path while simultaneously delivering 35 gpm to the SFP when each pump is tested separately, which meets the acceptance criteria.

The completed test results (References 1 through 4), confirm that with the PCCWST water level at 27.4 ft + 0.2, - 0.0 ft above the bottom of the tank, the flow path from the PCCWST to the spent fuel pool delivers greater than or equal to 118 gpm and that with the PCCASWST aligned to the suction of the recirculation pumps, each pump delivers greater than or equal to 100 gpm to the PCCWST and 35 gpm to the spent fuel pool simultaneously when each pump is tested separately.

References 1 through 4 are available for NRC inspection as part of Unit 3 and Unit 4 ITAAC Completion Packages (Reference 5 and 6).

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. 3-SFS-ITPP-503, "Spent Fuel Pool Loss of Large Area Preoperational Test Procedure"
4. 4-SFS-ITPP-503, "Spent Fuel Pool Loss of Large Area Preoperational Test Procedure"
5. 2.2.02.07f.i-U3-CP-Rev 0, ITAAC Completion Package
6. 2.2.02.07f.i-U4-CP-Rev 0, ITAAC Completion Package
7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"