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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 2.7.02.03a [Index Number 703]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of February 25, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections Tests Analyses and Acceptance Criteria (ITAAC) Item 2.7.02.03a [Index Number 703] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.7.02.03a [Index Number 703]. 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.

U.S. Nuclear Regulatory Commission
ND-19-0198
Page 2 of 4

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael J. Yox". The signature is fluid and cursive, with the first name "Michael" being the most prominent part.

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 2.7.02.03a [Index Number 703]

MJY/DLW/sfr

U.S. Nuclear Regulatory Commission

ND-19-0198

Page 3 of 4

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U.S. Nuclear Regulatory Commission

ND-19-0198

Page 4 of 4

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**Southern Nuclear Operating Company
ND-19-0198
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.7.02.03a [Index Number 703]**

ITAAC Statement

Design Commitment

- 3.a) The VWS provides chilled water to the supply air handling units serving the MCR, the Class 1E electrical rooms, and the unit coolers serving the RNS and CVS pump rooms.
4. Controls exist in the MCR to cause the components identified in Table 2.7.2-1 to perform the listed function.
5. Displays of the parameters identified in Table 2.7.2-1 can be retrieved in the MCR.

Inspections/Tests/Analyses

Testing will be performed by measuring the flow rates to the chilled water cooling coils.

Testing will be performed on the components in Table 2.7.2-1 using controls in the MCR.

Inspection will be performed for retrievability of parameters in the MCR.

Acceptance Criteria

The water flow to each cooling coil equals or exceeds the following:

<u>Coil</u>	<u>Flow (gpm)</u>
VBS MY C01A/B	96
VBS MY C02A/C	97
VBS MY C02B/D	52
VAS MY C07A/B	12.3
VAS MY C12A/B	8.2
VAS MY C06A/B	8.2

Controls in the MCR operate to cause the components listed in Table 2.7.2-1 to perform the listed functions.

The displays identified in Table 2.7.2-1 can be retrieved in the MCR.

ITAAC Completion Description

This ITAAC requires testing and inspections to be performed to verify that the Central Chilled Water System (VWS) provides the required chilled water flows to the air handling units for the Main Control Room (MCR), the class 1E electrical rooms, and the Normal Residual Heat Removal System (RNS) pump room coolers and Chemical and Volume Control System (CVS) pump room coolers. Testing also verifies controls in the Main Control Room (MCR) operate to cause components listed in COL Appendix C Table 2.7.2-1 (Attachment B) to perform their listed function and an inspection is performed to verify the displays identified in COL Appendix C Table 2.7.2-1 can be retrieved in the MCR.

The water flow to each cooling coil equals or exceeds the following:

<u>Coil</u>	<u>Flow (gpm)</u>
VBS MY C01A/B	96
VBS MY C02A/C	97
VBS MY C02B/D	52
VAS MY C07A/B	12.3
VAS MY C12A/B	8.2
VAS MY C06A/B	8.2

Testing is performed in accordance with Unit 3 and Unit 4 preoperational test procedures 3-VWS-ITPP-501 and 4-VWS-ITPP-501 (References 1 and 2) to verify that the cooling water flow to each cooling coil equals or exceeds the required flow rates.

Initial conditions are established with Low Capacity Chiller MS-02 in service and temporary flow instruments installed on the outlet line from each of the coolers tested. The flow control valves are manually opened to ensure full flow through the affected 6 coolers. When the chilled water flow stabilizes, 10 flow readings are taken at 3 minute intervals. The flow value for each cooler is verified to be above the required values, and the system is restored to normal. This testing is then repeated with the Low Capacity Chiller MS-03 and the remaining 6 cooler units. This testing shows that the flows obtained (Attachment A) are greater than or equal to the ITAAC acceptance criteria required flows.

Controls in the MCR operate to cause the components listed in Table 2.7.2-1 to perform the listed functions.

Testing is performed in accordance with Unit 3 and Unit 4 component test procedures SNC922140 and SNCXXXXXX (References 3 and 4) to verify that controls exist in the MCR and the controls operate to cause the components listed in Table 2.7.2-1 (Attachment B) to perform the listed functions.

The component test begins with the components in Attachment B in the closed position or shutdown condition. The valves are stroked to the open position using controls in the MCR, locally verified to be in the correct position and documented in the test. The ventilation components are started using controls in the MCR, locally verified to have started and documented in the test. The test results confirm that controls in Unit 3 and Unit 4 MCR operate to cause the components listed in Table 2.7.2-1 to perform the listed functions.

The displays identified in Table 2.7.2-1 can be retrieved in the MCR.

The inspection is performed in accordance with Unit 3 and Unit 4 component test procedures SNC922140 and SNCXXXXXX (References 3 and 4) to verify that the displays identified in Table 2.7.2-1 (Attachment C) can be retrieved in the MCR.

Testing begins at an operator work station in the Unit 3 and Unit 4 MCR and verifies all of the displays identified in Attachment B can be retrieved. This confirms that the displays identified in Table 2.7.2-1 can be retrieved in the Unit 3 and Unit 4 MCR.

The completed test results (References 1 through 4), confirm that the low capacity chillers provide the required flow to the listed components, that the controls in the MCR operate to cause the components listed in Table 2.7.2-1 to perform the listed functions, and that the displays identified in Table 2.7.2-1 can be retrieved in the MCR.

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-VWS-ITPP-501, "Central Chilled Water System Preoperational Test"
2. 4-VWS-ITPP-501, "Central Chilled Water System Preoperational Test"
3. SNC922140, "Central Chilled Water System Controls ITAAC: SV3-2.7.02.03a Items 4 and 5"
4. SNCXXXXXX, "Central Chilled Water System Controls ITAAC: SV4-2.7.02.03a Items 4 and 5"
5. 2.7.02.03a-U3-CP-Rev 0, ITAAC Completion Package
6. 2.7.02.03a-U4-CP-Rev 0, ITAAC Completion Package
7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

Chiller Unit	Unit	Coil Number	ITAAC Required Flow (gpm)	Actual Flow (gpm)
MS-02	3	VBS MY C01A	96	XX
	3	VBS MY C02A	97	XX
	3	VBS MY C02D	52	XX
	3	VAS MY C06A	8.2	X.X
	3	VAS MY C07A	12.3	XX.X
	3	VAS MY C012B	8.2	X.X
MS-03	3	VBS MY C01B	96	XX
	3	VBS MY C02B	52	XX
	3	VBS MY C02C	97	XX
	3	VAS MY C06B	8.2	X.X
	3	VAS MY C07B	12.3	XX.X
	3	VAS MY C012A	8.2	X.X
MS-02	4	VBS MY C01A	96	XX
	4	VBS MY C02A	97	XX
	4	VBS MY C02D	52	XX
	4	VAS MY C06A	8.2	X.X
	4	VAS MY C07A	12.3	XX.X
	4	VAS MY C012B	8.2	X.X
MS-03	4	VBS MY C01B	96	XX
	4	VBS MY C02B	52	XX
	4	VBS MY C02C	97	XX
	4	VAS MY C06B	8.2	X.X
	4	VAS MY C07B	12.3	XX.X
	4	VAS MY C012A	8.2	X.X

Attachment B

Excerpt from COL Appendix C Table 2.7.2-1

Equipment Name	Tag No.	Control Function
Air-cooled Chiller	VWS-MS-02	Start
Air-cooled Chiller	VWS-MS-03	Start
Air-cooled Chiller Pump	VWS-MP-02	Start
Air-cooled Chiller Pump	VWS-MP-03	Start
CVS Pump Room Unit Cooler Fan A	VAS-MA-07A	Start
CVS Pump Room Unit Cooler Fan B	VAS-MA-07B	Start
RNS Pump Room Unit Cooler Fan A	VAS-MA-08A	Start
RNS Pump Room Unit Cooler Fan B	VAS-MA-08B	Start
Air-cooled Chiller Water Valve	VWS-PL-V210	Open
Air-cooled Chiller Water Valve	VWS-PL-V253	Open

Attachment C

Excerpt from COL Appendix C Table 2.7.2-1

Equipment Name	Tag No.	Display
Air-cooled Chiller	VWS-MS-02	Yes (Run Status)
Air-cooled Chiller	VWS-MS-03	Yes (Run Status)
Air-cooled Chiller Pump	VWS-MP-02	Yes (Run Status)
Air-cooled Chiller Pump	VWS-MP-03	Yes (Run Status)
CVS Pump Room Unit Cooler Fan A	VAS-MA-07A	Yes (Run Status)
CVS Pump Room Unit Cooler Fan B	VAS-MA-07B	Yes (Run Status)
RNS Pump Room Unit Cooler Fan A	VAS-MA-08A	Yes (Run Status)
RNS Pump Room Unit Cooler Fan B	VAS-MA-08B	Yes (Run Status)
Air-cooled Chiller Water Valve	VWS-PL-V210	Yes (Position Status)
Air-cooled Chiller Water Valve	VWS-PL-V253	Yes (Position Status)