

MAR 14 2019

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706-848-6459 telDocket Nos.: 52-025
52-026ND-19-0137
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 2.5.02.10 [Index Number 549]

Ladies and Gentlemen:

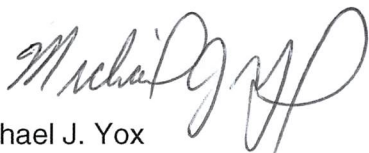
Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of March 11, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.5.02.10 [Index Number 549] has not been completed 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.

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.

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 2.5.02.10 [Index Number 549]

MJY/LBP/sfr

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**Southern Nuclear Operating Company
ND-19-0137
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.5.02.10 [Index Number 549]**

ITAAC Statement

Design Commitment

10. Setpoints are determined using a methodology which accounts for loop inaccuracies, response testing, and maintenance or replacement of instrumentation.

Inspections/Tests/Analyses

Inspection will be performed for a document that describes the methodology and input parameters used to determine the PMS setpoints.

Acceptance Criteria

A report exists and concludes that the PMS setpoints are determined using a methodology which accounts for loop inaccuracies, response testing, and maintenance or replacement of instrumentation.

ITAAC Completion Description

An inspection is performed to verify that the Protection and Safety Monitoring System (PMS) setpoints are determined using a methodology which accounts for loop inaccuracies, response testing, and maintenance or replacement of instrumentation.

WCAP-16361-P, "Westinghouse Setpoint Methodology for Protection Systems – AP1000" (Reference 1), identifies the methodology used to determine the overall instrument uncertainty (i.e. loop inaccuracy) for a Reactor Trip System (RTS) and Engineered Safeguards Features Actuation System (ESFAS) function. Reference 1 provides specific instructions for calculating instrument and loop uncertainty setpoints in accordance with ANSI/ISA-67.04.01-2000 (as endorsed by Regulatory Guide 1.105, Revision 3). An inspection of the RTS/ESFAS function setpoint and uncertainty calculations is performed to confirm each calculation employs the WCAP-16361-P methodology to determine loop inaccuracies.

Section 5.5.14 of the AP1000 Technical Specifications (TS) requires the nominal trip setpoint, As-Found Tolerance (AFT), and As-Left Tolerance (ALT) for each TS-required automatic protection instrumentation function be calculated in conformance with WCAP-16361-P. These requirements are used to determine if maintenance or replacement of instrumentation is needed. If maintenance or replacement is required, the Work Management (Reference 2), and Plant Modification and Configuration Change Processes (Reference 3), accounts for any impacts on instrumentation or issued calculations. An inspection of the RTS/ESFAS function setpoint and uncertainty calculations is performed to confirm each calculation employs the WCAP-16361-P methodology for AFT and ALT.

The methodology utilized for response time determination is per UFSAR Chapter 15 criteria (Reference 4), and response testing is conducted within the preoperational test program per UFSAR Chapter 14 (Reference 4). UFSAR section 15.0.6 (Reference 4), discusses the PMS time delay methodology that is assumed in the accident analysis for RTS and equipment actuated by ESFAS functions. An inspection of the preoperational test procedures (References 5 and 6), is performed to confirm that each test procedure employs the response time methodology to determine response time.

References 1 through 6 are available for NRC inspection as part of Unit 3 and Unit 4 ITAAC 2.5.02.10 Completion Packages (References 7 and 8, respectively).

List of ITAAC Findings

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company 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. WCAP-16361-P, "Westinghouse Setpoint Methodology for Protection Systems – AP1000"
2. NMP-GM-006, "Work Management"
3. NMP-ES-084-001, "Plant Modification and Configuration Change Processes"
4. VEGP 3&4 UFSAR,
 - o Section 14.2.9.1.12, "Protection and Safety Monitoring System Testing"
 - o Section 15.0.6, "Protection and Safety Monitoring System Setpoints and Time Delays to Trip Assumed in Accident Analyses"
5. 3-PMS-ITPP-502, "PMS Response Time Preoperational Test Procedure"
6. 4-PMS-ITPP-502, "PMS Response Time Preoperational Test Procedure"
7. 2.5.02.10-U3-CP-Rev 0, ITAAC Completion Package
8. 2.5.02.10-U4-CP-Rev 0, ITAAC Completion Package
9. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"