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Docket No.: 52-025

ND-19-0259
10 CFR 52.99(c)(1)U.S. Nuclear Regulatory Commission
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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
ITAAC Closure Notification on Completion of ITAAC 2.3.07.07b.ii [Index Number 403]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.3.07.07b.ii [Index Number 403] for verifying the water volume of the Cask Washdown Pit is greater than or equal to 34,100 gallons. The closure process for this ITAAC is based on 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.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

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
 Completion of ITAAC 2.3.07.07b.ii [Index Number 403]

MJY/GJL/sfr

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**Southern Nuclear Operating Company
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Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 2.3.07.07b.ii [Index Number 403]**

ITAAC Statement

Design Commitment

7.b) The SFS provides spent fuel cooling for 7 days by boiling the spent fuel pool water and makeup water from on-site storage tanks.

Inspections, Tests, Analysis

ii) Inspection will be performed to verify the cask washdown pit includes sufficient volume of water.

Acceptance Criteria

ii) The water volume of the cask washdown pit from the cask washdown pit floor to 13.75 feet above the cask washdown pit floor is greater than or equal to 34,100 gallons.

ITAAC Determination Basis

Multiple ITAAC are performed to demonstrate that the Spent Fuel Pool Cooling System (SFS) provides spent fuel cooling for 7 days by boiling the spent fuel pool water and makeup water from on-site storage tanks. This ITAAC performs an inspection to verify the water volume of the Cask Washdown Pit (CWP) from the CWP floor to 13.75 feet above the CWP floor is greater than or equal to 34,100 gallons.

An inspection was performed of the as-built CWP to confirm the internal volume from the floor to 13.75 feet above the floor. Measurements were taken of the as-built dimensions of the rectangular CWP internal length and width from the CWP floor to 13.75 feet above the CWP floor and results were used to calculate the internal volume. Measurements were taken using survey equipment in accordance with the site survey and measurement procedure (Reference 1). Inspections were also performed to determine the water displacement volume associated with the personnel access ladder located in the CWP. The water displacement volume of the ladder was subtracted from CWP internal volume to obtain the net water volume.

The results were documented in the Unit 3 Principle Closure Document (Reference 2) which show the water volume of the CWP from the floor of the CWP to 13.75 feet above the floor of the CWP is 34,103 gallons and meets the ITAAC acceptance criteria.

Reference 2 is available for NRC inspection as part of the Unit 3 ITAAC completion package (Reference 3).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found that there are no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.3.07.07b.ii (Reference 3) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.3.07.07b.ii was performed for VEGP Unit 3 and that the prescribed acceptance criteria were met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. 26139-000-4MP-T81C-N3201, Rev. 4, "Construction Survey"
2. SV3-CA20-C0K-800403, Rev. 1, "Volume of the Cask Washdown Pit Room 12462"
3. 2.3.07.07b.ii-U3-CP-Rev0, ITAAC Completion Package