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52-026ND-19-0244
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 2.3.09.04b [Index Number 428]

Ladies and Gentlemen:

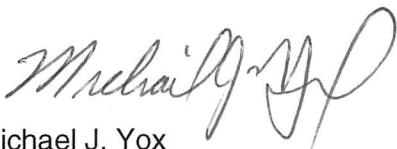
Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of March 11, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.3.09.04b [Index Number 428] has not been completed 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 2.3.09.04b [Index Number 428]

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Southern Nuclear Operating Company
ND-19-0244
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.3.09.04b [Index Number 428]

ITAAC Statement

Design Commitment

4.b) The components identified in Table 2.3.9-2 perform the listed function after receiving manual a signal from DAS.

Inspections, Tests, Analyses

Testing will be performed on the igniters using the DAS controls.

Acceptance Criteria

The igniters energize after receiving a signal from DAS.

ITAAC Completion Description

Testing is performed in accordance with Unit 3 and Unit 4 preoperational test procedures 3(4)-DAS-ITPP-501 (References 1 and 2, respectively) and 3(4)-VLS-ITPP-501 (References 3 and 4, respectively), to confirm the components identified in Combined License (COL) Appendix C Table 2.3.9-2 (Attachment A) perform the listed function after receiving a manual signal from the Diverse Actuation System (DAS).

Testing is performed in two parts to verify the igniters energize after receiving a signal from DAS. In test procedure 3(4)-DAS-ITPP-501, Hydrogen Igniter Control Switches 3(4)-DAS-HS213 and 3(4)-DAS-HS214, at the DAS control panel in the Main Control Room (MCR) are switched to the ON position. A digital multimeter is then used to verify the Containment Hydrogen Igniter control relays in Hydrogen Igniter Control Panels 3(4)-VLS-JC-001 (Group 1), and 3(4)-VLS-JC-002 (Group 2), are energized. The Hydrogen Igniter Control Switches are then switched to the OFF position.

In the second part, test procedure 3(4)-VLS-ITPP-501 places Hydrogen Igniters switches VLS-EH-GR1 (Group 1) and VLS-EH-GR2 (Group 2) to the ON position. The same relays verified as energized in References 1 and 2 are also are verified as energized in this procedure; relays in Hydrogen Igniter Control Panels 3(4)-VLS-JC-001 (Group 1), and 3(4)-VLS-JC-002 (Group 2). An inspection verifies that each of the sixty-six igniters identified in Attachment A are energized by recording an overall increase of igniter temperatures at 10 second intervals for 90 seconds. Switches VLS-EH-GR1 (Group 1) and VLS-EH-GR2 (Group 2), are then placed to the OFF position.

Unit 3 and Unit 4 preoperational test results (References 1 through 4) confirm the igniters energize after receiving a signal from DAS.

References 1 through 4 are available for NRC inspection as part of Unit 3 and Unit 4 ITAAC 2.3.09.04b Completion Packages (References 5 and 6, respectively).

List of ITAAC Findings

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with the ITAAC.

References (available for NRC inspection)

1. 3-DAS-ITPP-501, "Diverse Actuation System Preoperational Test Procedure"
2. 4-DAS-ITPP-501, "Diverse Actuation System Preoperational Test Procedure"
3. 3-VLS-ITPP-501, "Containment Hydrogen Control System Preoperational Test Procedure"
4. 4-VLS-ITPP-501, "Containment Hydrogen Control System Preoperational Test Procedure"
5. 2.3.09.04b-U3-CP-Rev 0, ITAAC Completion Package
6. 2.3.09.04b-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
Excerpt from COL Table 2.3.9-2

Equipment Name	Tag Number	Function	Power Group Number
Hydrogen Igniter 01	VLS-EH-01	Energize	1
Hydrogen Igniter 02	VLS-EH-02	Energize	2
Hydrogen Igniter 03	VLS-EH-03	Energize	1
Hydrogen Igniter 04	VLS-EH-04	Energize	2
Hydrogen Igniter 05	VLS-EH-05	Energize	1
Hydrogen Igniter 06	VLS-EH-06	Energize	2
Hydrogen Igniter 07	VLS-EH-07	Energize	2
Hydrogen Igniter 08	VLS-EH-08	Energize	1
Hydrogen Igniter 09	VLS-EH-09	Energize	1
Hydrogen Igniter 10	VLS-EH-10	Energize	2
Hydrogen Igniter 11	VLS-EH-11	Energize	2
Hydrogen Igniter 12	VLS-EH-12	Energize	1
Hydrogen Igniter 13	VLS-EH-13	Energize	1
Hydrogen Igniter 14	VLS-EH-14	Energize	2
Hydrogen Igniter 15	VLS-EH-15	Energize	2
Hydrogen Igniter 16	VLS-EH-16	Energize	1
Hydrogen Igniter 17	VLS-EH-17	Energize	2
Hydrogen Igniter 18	VLS-EH-18	Energize	1
Hydrogen Igniter 19	VLS-EH-19	Energize	2
Hydrogen Igniter 20	VLS-EH-20	Energize	2
Hydrogen Igniter 21	VLS-EH-21	Energize	1
Hydrogen Igniter 22	VLS-EH-22	Energize	1
Hydrogen Igniter 23	VLS-EH-23	Energize	2
Hydrogen Igniter 24	VLS-EH-24	Energize	2
Hydrogen Igniter 25	VLS-EH-25	Energize	2
Hydrogen Igniter 26	VLS-EH-26	Energize	2
Hydrogen Igniter 27	VLS-EH-27	Energize	1
Hydrogen Igniter 28	VLS-EH-28	Energize	1
Hydrogen Igniter 29	VLS-EH-29	Energize	1
Hydrogen Igniter 30	VLS-EH-30	Energize	2
Hydrogen Igniter 31	VLS-EH-31	Energize	1
Hydrogen Igniter 32	VLS-EH-32	Energize	1
Hydrogen Igniter 33	VLS-EH-33	Energize	2
Hydrogen Igniter 34	VLS-EH-34	Energize	1
Hydrogen Igniter 35	VLS-EH-35	Energize	1
Hydrogen Igniter 36	VLS-EH-36	Energize	2
Hydrogen Igniter 37	VLS-EH-37	Energize	1

Attachment A (cont.)
Excerpt from COL Table 2.3.9-2

Equipment Name	Tag Number	Function	Power Group Number
Hydrogen Igniter 38	VLS-EH-38	Energize	2
Hydrogen Igniter 39	VLS-EH-39	Energize	1
Hydrogen Igniter 40	VLS-EH-40	Energize	2
Hydrogen Igniter 41	VLS-EH-41	Energize	2
Hydrogen Igniter 42	VLS-EH-42	Energize	1
Hydrogen Igniter 43	VLS-EH-43	Energize	1
Hydrogen Igniter 44	VLS-EH-44	Energize	1
Hydrogen Igniter 45	VLS-EH-45	Energize	2
Hydrogen Igniter 46	VLS-EH-46	Energize	2
Hydrogen Igniter 47	VLS-EH-47	Energize	1
Hydrogen Igniter 48	VLS-EH-48	Energize	2
Hydrogen Igniter 49	VLS-EH-49	Energize	1
Hydrogen Igniter 50	VLS-EH-50	Energize	2
Hydrogen Igniter 51	VLS-EH-51	Energize	1
Hydrogen Igniter 52	VLS-EH-52	Energize	2
Hydrogen Igniter 53	VLS-EH-53	Energize	2
Hydrogen Igniter 54	VLS-EH-54	Energize	1
Hydrogen Igniter 55	VLS-EH-55	Energize	1
Hydrogen Igniter 56	VLS-EH-56	Energize	2
Hydrogen Igniter 57	VLS-EH-57	Energize	2
Hydrogen Igniter 58	VLS-EH-58	Energize	1
Hydrogen Igniter 59	VLS-EH-59	Energize	2
Hydrogen Igniter 60	VLS-EH-60	Energize	1
Hydrogen Igniter 61	VLS-EH-61	Energize	1
Hydrogen Igniter 62	VLS-EH-62	Energize	2
Hydrogen Igniter 63	VLS-EH-63	Energize	1
Hydrogen Igniter 64	VLS-EH-64	Energize	2
Hydrogen Igniter 65	VLS-EH-65	Energize	1
Hydrogen Igniter 66	VLS-EH-66	Energize	2