Southern Nuclear

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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 C.2.6.09.08a [Index Number 668]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of March 22, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item C.2.6.09.08a [Index Number 668] 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 & Unit 4
Completion Plan for Uncompleted ITAAC C.2.6.09.08a [Index Number 668]

MJY/RLB/sfr

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Southern Nuclear Operating Company
ND-19-0270
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 & Unit 4
Completion Plan for Uncompleted ITAAC C.2.6.09.08a [Index Number 668]

ITAAC Statement

Design Commitment

8.a) Penetrations through the protected area barrier are secured and monitored.

8.b) Unattended openings (such as underground pathways) that intersect the protected area boundary or vital area boundary will be protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation.

Inspections/Tests/Analyses

Inspections will be performed of penetrations through the protected area barrier.

Inspections will be performed of unattended openings that intersect the protected area boundary or vital area boundary.

Acceptance Criteria

Penetrations and openings through the protected area barrier are secured and monitored.

Unattended openings (such as underground pathways) that intersect the protected area boundary or vital area boundary are protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation.

ITAAC Completion Description

Inspections of the penetrations through the protected area barrier and of the unattended openings that intersect the protected area boundary or vital area boundary are performed to verify that penetrations and openings through the protected area barrier are secured and monitored, and the unattended openings (such as underground pathways) that intersect the protected area boundary or vital area boundary are protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation. The VEGP Unit 3 (Unit 4) Plant Security System ITAACs only cover the Unit 3 (Unit 4) plant security system design commitment scope.

Penetrations and openings through the protected area barrier are secured and monitored.

A walkdown inspection is performed of the as-built protected area barrier per Procedure XXX (Reference 1) to verify that the penetrations and openings through the protected area barrier are secured and monitored and satisfy the applicable protected area barrier penetration and opening requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR 73.55(e)(8)(ii).

The inspection involves visual observation of each protected area barrier penetration and opening, that could provide unauthorized access through the protected area barrier, to confirm that the penetration or opening is secured, and monitored by intrusion detection equipment that will alert security force personnel of unauthorized access through the protected area barrier penetration or opening.

The results of the inspection are documented in Reference 1 and verify that the penetrations and openings through the protected area barrier are secured and monitored.

Unattended openings (such as underground pathways) that intersect the protected area boundary or vital area boundary are protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation.

Inspections are performed to verify that unattended openings (such as underground pathways) that intersect the protected area boundary or vital area boundary are protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation and satisfy the applicable protected area boundary and vital area boundary unattended openings requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR 73.55(i)(5)(iii).

The unattended opening protected area boundary inspection is performed per Procedure YYY (Reference 2) and involves a review of approved construction drawings and performance of walkdowns to identify unattended openings with an entry point exterior to the protected area boundary and an exit point interior to the protected area boundary that could potentially meet or exceed the 96 square inch (with at least one dimension equal to or greater than 6 inches) criteria used to identify unattended openings that are potentially traversable pathways which could be used as exploitable entry points into the protected area. As discussed in NRC-endorsed Nuclear Energy Institute (NEI) 09-05 (Reference 3), pathways with documentation that shows the pathway cannot be physically traversed by persons and/or equipment due to pathway configuration or un-survivable conditions is not considered a potentially traversable pathway. Each identified potentially traversable pathway is verified to be protected by an acceptable physical barrier, and either monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation. Types of surveillance include area observation by fixed posts, closed circuit television (CCTV) by fixed posts or alarm station personnel, dedicated observer using CCTV/monitoring equipment, routine surveillance or physical inspection by roving patrols or posts, or a combination thereof.

The VEGP Unit 3 (Unit 4) physical security design includes several vital areas that are located within a larger vital area. In cases where a specific vital area boundary is located within a larger vital area boundary, the unattended opening vital area boundary inspection and acceptance criteria are applied only to the first vital area boundary that would be encountered by an adversary. This is consistent with the requirements of 10 CFR 73.55(e)(9)(i), which require that vital equipment be located only within vital areas, which must be located within a protected area so that access to vital equipment requires passage through at least two physical barriers. For stand-alone vital areas, not located within another vital area, the inspection and acceptance criteria are applied to the stand-alone vital area boundary.

The unattended opening vital area boundary inspection is performed per Procedure ZZZ (Reference 4) and involves a review of approved construction drawings and performance of walkdowns to identify unattended openings with an entry point exterior to the vital area boundary and an exit point interior to the vital area boundary that could potentially meet or exceed the 96 square inch (with at least one dimension equal to or greater than 6 inches) criteria used to identify unattended openings that are potentially traversable pathways which could be used as an exploitable entry point into the vital area under review. As discussed in Reference 3, pathways with documentation that shows the pathway cannot be physically traversed by persons and/or equipment due to pathway configuration or un-survivable conditions are not considered a potentially traversable pathway. Each identified potentially traversable pathway is verified to be protected by an acceptable physical barrier, and either monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to

detect exploitation. Types of surveillance include area observation by fixed posts, closed circuit television (CCTV) by fixed posts or alarm station personnel, dedicated observer using CCTV/monitoring equipment, routine surveillance or physical inspection by roving patrols or posts, or a combination thereof.

The results of the unattended opening inspections are documented in References 2 and 4 and verify that unattended openings (such as underground pathways) that intersect the protected area boundary or vital area boundary are protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation.

References 1, 2 and 4 are available for NRC inspection as part of the Unit 3 (Unit 4) ITAAC C.2.6.09.08a Completion Package (Reference 5 [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. Procedure XXX, Unit 3 (Unit 4) Protected Area Barrier Penetrations and Openings Inspection
2. Procedure YYY, Unit 3 (Unit 4) Protected Area Boundary Unattended Openings Inspection
3. NEI 09-05, "Guidance on the Protection of Unattended Openings that Intersect a Security Boundary", Rev. 0
4. Procedure ZZZ, Unit 3 (Unit 4) Vital Area Boundary Unattended Openings Inspection
5. C.2.6.09.08a -U3-CP-Rev 0, ITAAC Completion Package
6. C.2.6.09.08a -U4-CP-Rev 0, ITAAC Completion Package
7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"