Southern Nuclear

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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 2.4.01.02 [Index Number 493]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of March 23, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections Tests Analyses and Acceptance Criteria (ITAAC) Item 2.4.01.02 [Index Number 493] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.4.01.02 [Index Number 493]. 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

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 2.4.01.02 [Index Number 493]

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Southern Nuclear Operating Company
ND-19-0261
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Completion Plan for Uncompleted ITAAC 2.4.01.02 [Index Number 493]

ITAAC Statement

Design Commitment

2. The FWS provides startup feedwater flow from the CST to the SGS for heat removal from the RCS.

3. Controls exist in the MCR to cause the components identified in Table 2.4.1-1 to perform the listed function.

4. Displays of the parameters identified in Table 2.4.1-1 can be retrieved in the MCR.

Inspections/Tests/Analyses

Testing will be performed to confirm that each of the startup feedwater pumps can provide water from the CST to both steam generators.

Testing will be performed on the components in Table 2.4.1-1 using controls in the MCR.

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

Acceptance Criteria

Each FWS startup feedwater pump provides a flow rate greater than or equal to 260 gpm to each steam generator system at a steam generator secondary side pressure of at least 1106 psia.

Controls in the MCR operate to cause the components listed in Table 2.4.1-1 to perform the listed functions.

The displays identified in Table 2.4.1-1 can be retrieved in the MCR.

ITAAC Completion Description

This ITAAC requires testing and inspections be performed to verify that the Main and Startup Feedwater System (FWS) provides 260 gpm of startup feedwater flow from the Condensate Storage Tank (CST) to the Steam Generator System (SGS) for Reactor Coolant System (RCS) heat removal, that controls exist in the Main Control Room (MCR) and operate to cause the components listed in the VEGP Unit 3 and Unit 4 Combined Operating License COL Appendix C Table 2.4.1-1 (Attachment A) to perform the listed function, and that the displays of parameters identified in VEGP Unit 3 and Unit 4 COL Appendix C Table 2.4.1-1 (Attachment B) can be retrieved in the Main Control Room (MCR).

Each FWS startup feedwater pump provides a flow rate greater than or equal to 260 gpm to each steam generator system at a steam generator secondary side pressure of at least 1106 psia.

Testing is performed in accordance with Unit 3 and Unit 4 preoperational test procedures 3-FWS-ITPP-502 and 4-FWS-ITPP-502 (References 1 and 2) to verify that each Startup

Feedwater pump can provide greater than or equal to 260 gpm to each steam generator system at a secondary side pressure of at least 1106 psia.

Initial conditions are established with the plant at Normal Operating Pressure (NOP) and Normal Operating Temperature (NOT) utilizing the plant general operating procedure. Steam Generator pressure control is placed into Automatic to maintain secondary pressure at 1125 psia and temporary flow instruments are installed on the startup feedwater lines to each steam generator. Main Feedwater flow is stopped and Startup Feedwater flow is initiated using the A Startup Feedwater pump. Flow is recorded and verified to be greater than or equal to 260 gpm to each steam generator system. This testing is repeated using the B Startup Feedwater pump.

The results of the testing show that the Unit 3 A startup feedwater pump provides XXX gpm to the A steam generator and YYY gpm to the B steam generator and the B startup feedwater pump provides XXX gpm to the A steam generator and YYY gpm to the B steam generator. The Unit 4 A startup feedwater pump provides XXX gpm to the A steam generator and YYY gpm to the B steam generator and the B startup feedwater pump provides XXX gpm to the A steam generator and YYY gpm to the B steam generator.

This testing confirms that for Unit 3 and Unit 4 each FWS startup feedwater pump provides a flow rate greater than or equal to 260 gpm to each steam generator system at a steam generator secondary side pressure of at least 1106 psia.

Controls in the MCR operate to cause the components listed in Table 2.4.1-1 to perform the listed functions.

Testing is performed in accordance with Unit 3 and Unit 4 component test procedures SNCXXXXXX and SNCYYYYYY (References 3 and 4) to verify that controls exist in the MCR and the controls operate to cause the components listed in Table 2.4.1-1 (Attachment A) to perform the listed functions.

The component test begins with the components in Attachment A in the closed position or shutdown condition. An operator is stationed locally to monitor and verify component actuations. The A startup feedwater pump is started using PLS controls and the pump isolation valve is verified to open. The A startup feedwater pump is stopped and this testing is repeated for the B startup feedwater pump. The test results confirm that controls in Unit 3 and Unit 4 MCR operate to cause the components listed in Table 2.4.1-1 to perform the listed functions.

The displays identified in Table 2.4.1-1 can be retrieved in the MCR.

The inspection is performed in accordance with Unit 3 and Unit 4 component test procedures SNCXXXXXX and SNCYYYYYY (References 3 and 4) to verify that the displays identified in Table 2.4.1-1 (Attachment B) can be retrieved in the MCR.

Testing begins at an operator work station in the Unit 3 and Unit 4 MCR and verifies all the displays identified in Attachment B can be retrieved. This confirms that the displays identified in Table 2.4.1-1 can be retrieved in the Unit 3 and Unit 4 MCR.

The completed test results (References 1 through 4), confirm that each of the startup feedwater pumps provide the required flow to each steam generator system, that the controls in the MCR

operate to cause the components listed in Table 2.4.1-1 to perform the listed functions, and that the displays identified in Table 2.4.1-1 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-FWS-ITPP-502, "Main and Startup Feedwater System (FWS) Hot Functional Test Procedure"
2. 4-FWS-ITPP-502, "Main and Startup Feedwater System (FWS) Hot Functional Test Procedure"
3. SNCXXXXXX, "SFW Pump Start and Discharge Valve Verification Test – ITAAC: SV3-2.4.01.02, Items 3 and 4"
4. SNCYYYYYY, "SFW Pump Start and Discharge Valve Verification Test – ITAAC: SV4-2.4.01.02, Items 3 and 4"
5. 2.4.01.02-U3-CP-Rev 0, ITAAC Completion Package
6. 2.4.01.02-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 Appendix C Table 2.4.1-1

Equipment Name	Tag No.	Control Function
Startup Feedwater Pump A (Motor)	FWS-MP-03A	Start
Startup Feedwater Pump B (Motor)	FWS-MP-03B	Start
Startup Feedwater Pump A Isolation Valve	FWS-PL-V013A	Open
Startup Feedwater Pump B Isolation Valve	FWS-PL-V013B	Open

Attachment B

Excerpt from COL Appendix C Table 2.4.1-1

Equipment Name	Tag No.	Display
Startup Feedwater Pump A (Motor)	FWS-MP-03A	Yes (Run Status)
Startup Feedwater Pump B (Motor)	FWS-MP-03B	Yes (Run Status)
Startup Feedwater Pump A Isolation Valve	FWS-PL-V013A	Yes (Valve Position)
Startup Feedwater Pump B Isolation Valve	FWS-PL-V013B	Yes (Valve Position)