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52-026

ND-19-0333  
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U.S. Nuclear Regulatory Commission  
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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 C.2.6.09.03a [Index Number 660]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of April 2, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item C.2.6.09.03a [Index Number 660] 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.2.6.09.03a [Index Number 660]

MJY/RLB/sfr

U.S. Nuclear Regulatory Commission

ND-19-0333

Page 2 of 3

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U.S. Nuclear Regulatory Commission

ND-19-0333

Page 3 of 3

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**Southern Nuclear Operating Company  
ND-19-0333  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 & Unit 4  
Completion Plan for Uncompleted ITAAC C.2.6.09.03a [Index Number 660]**

## **ITAAC Statement**

### **Design Commitment**

3.a) Isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area that allows 20 feet of observation on either side of the barrier. Where permanent buildings do not allow a 20-foot observation distance on the inside of the protected area, the building walls are immediately adjacent to, or an integral part of, the protected area barrier.

### **Inspections/Tests/Analyses**

Inspections will be performed of the isolation zones in outdoor areas adjacent to the physical barrier at the perimeter of the protected area.

### **Acceptance Criteria**

Isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and allow 20 feet of observation and assessment of the activities of people on either side of the barrier. Where permanent buildings do not allow a 20-foot observation and assessment distance on the inside of the protected area, the building walls are immediately adjacent to, or an integral part of, the protected area barrier and the 20-foot observation and assessment distance does not apply.

### **ITAAC Completion Description**

An inspection of the isolation zones in outdoor areas adjacent to the physical barrier at the perimeter of the protected area is performed to verify that isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and allow 20 feet of observation and assessment of the activities of people on either side of the barrier and satisfy the applicable protected area perimeter physical barrier isolation zone requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR 73.55(e)(7)(i)(A). The VEGP Unit 3 (Unit 4) Plant Security System ITAACs only cover the Unit 3 (Unit 4) plant security system design commitment scope.

Where permanent buildings do not allow a 20-foot observation and assessment distance on the inside of the protected area, the building walls are immediately adjacent to, or an integral part of, the protected area barrier and the 20-foot observation and assessment distance does not apply. In the case of VEGP Unit 3 (Unit 4), a point on both the Personnel Access Point (Building 304) east and west exterior walls intersects and is immediately adjacent to the protected area perimeter physical barrier. The protected area perimeter physical boundary continues through the inside of Building 304 between the building's east and west exterior walls and is monitored with intrusion detection. The Building 304 roof is monitored by a perimeter intrusion detection system and security cameras and is only accessible from inside the protected area. The interior of Building 304 is monitored by security cameras and a continuously manned Bullet Resisting Enclosure. Building 304 is the common personnel access control portal to both the VEGP Unit 3 and Unit 4 protected area. There are no other permanent buildings at VEGP Unit 3 (Unit 4) that are immediately adjacent to, or an integral part of, the VEGP Unit 3 (Unit 4) protected area perimeter physical barrier.

The inspection is performed per Procedure XXX (Reference 1) and measures, using a commercially available measuring device, the isolation zone observation and assessment distance in outdoor areas that are adjacent to either side of protected area perimeter physical

barrier. The measurements verify that a minimum 20-foot observation and assessment distance exists on either side of the protected area perimeter physical barrier. The inspection also visually confirms that the isolation zone observation and assessment distance measured above is clear of objects which could conceal or shield the activities of people on either side of the protected area perimeter physical barrier. Lastly, the inspection visually verifies that the Building 304 east and west exterior walls intersect, and are immediately adjacent to, the protected area perimeter physical barrier.

The results of the inspection are documented in Reference 1 and verify that isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and allow 20 feet of observation and assessment of the activities of people on either side of the barrier. Where permanent buildings do not allow a 20-foot observation and assessment distance on the inside of the protected area the inspection results verify that the building walls are immediately adjacent to, or an integral part of, the protected area barrier.

Reference 1 is available for NRC inspection as part of the Unit 3 (Unit 4) ITAAC C.2.6.09.03a Completion Package (Reference 2 [3]).

### **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 Perimeter Physical Barrier Outdoor Isolation Zone Inspection
2. C.2.6.09.03a -U3-CP-Rev 0, ITAAC Completion Package
3. C.2.6.09.03a -U4-CP-Rev 0, ITAAC Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"