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Docket Nos.: 52-025
52-026ND-19-0364
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 2.3.03.03c [Index Number 322]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of April 08, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections Tests Analyses and Acceptance Criteria (ITAAC) Item 2.3.03.03c [Index Number 322] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.3.03.03c [Index Number 322]. 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

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Respectfully submitted,

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Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.3.03.03c [Index Number 322]

MJY/DLW/sfr

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**Southern Nuclear Operating Company
ND-19-0364
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.3.03.03c [Index Number 322]**

ITAAC Statement

Design Commitment

3.c) The fuel oil flow rate to the day tank of each standby diesel generator provides for continuous operation of the associated diesel generator.

Inspections/Tests/Analyses

Testing will be performed to determine the flow rate.

Acceptance Criteria

The flow rate delivered to each day tank is 8 gpm or greater.

ITAAC Completion Description

Testing is performed in accordance with Unit 3 and Unit 4 preoperational test procedures 3-ZOS-ITPP-501 and 4-ZOS-ITPP-501 (References 1 and 2) to verify that the fuel oil flow rate to the day tank of each standby diesel generator provides for continuous operation of the associated diesel generator and that the testing performed verifies the flow rate delivered to each day tank is 8 gpm or greater.

Initial conditions are established with Onsite Diesel Generator A Package (ZOS-MS-05A) running with a load applied and temporary flow instruments installed to measure fuel oil flow. Manual fill of the fuel oil day tank is initiated and flow rate readings are recorded. This testing is repeated for Onsite Diesel Generator B Package.

The results of the testing show that the fuel oil delivery rate to Unit 3 Onsite Diesel Generator A Package is X gpm and Y gpm for Unit 3 Onsite Diesel Generator B Package. The fuel oil delivery rate to Unit 4 Onsite Diesel Generator A Package is X gpm and Y gpm for Unit 4 Onsite Diesel Generator B Package. This verifies the flow rate delivered to each day tank is 8 gpm or greater.

References 1 and 2 are available for NRC inspection as part of Unit 3 and Unit 4 ITAAC Completion Packages (Reference 3 and 4).

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-ZOS-ITPP-501, "Onsite Standby Power System"
2. 4-ZOS-ITPP-501, "Onsite Standby Power System"
3. 2.3.03.03c-U3-CP-Rev 0, ITAAC Completion Package
4. 2.3.03.03c-U4-CP-Rev 0, ITAAC Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"