Southern Nuclear

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52-026

ND-19-0302
10 CFR 52.99(c)(3)

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 2.5.01.03e [Index Number 515]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of April 1, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.5.01.03e [Index Number 515] 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 2.5.01.03e [Index Number 515]

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Southern Nuclear Operating Company
ND-19-0302
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.5.01.03e [Index Number 515]

ITAAC Statement

Design Commitment

3.e) The sensors identified on Table 2.5.1-3 are used for DAS input and are separate from those being used by the PMS and plant control system.

Inspections, Tests, Analyses

Inspection of the as-built system will be performed.

Acceptance Criteria

The sensors identified on Table 2.5.1-3 are used by DAS and are separate from those being used by the PMS and plant control system.

ITAAC Completion Description

Inspection of the as-built Diverse Actuation System (DAS) is performed to demonstrate that the sensors identified in Combined License (COL) Appendix C Table 2.5.1-3 (Attachment A) are used for DAS input and are separate from those being used by the Protection and Safety Monitoring System (PMS) and plant control system.

The DAS System Specification Document (Reference 1) requires that the sensors identified in Attachment A be used for DAS input and are separate and independent from the sensor inputs in the PMS and plant control system. Construction drawing SV3(4)-DAS-J0-001, (Reference 2), illustrates the DAS sensor flow and indication architecture. An inspection of completed construction records is performed in accordance with Procedure XXX (Reference 3), to confirm that the sensors identified in Attachment A are installed per the DAS sensor input requirements of Reference 1 and 2 and are separate from those being used by the PMS and plant control system.

The inspection results are documented in Unit 3 and Unit 4 Principal Closure Documents (References 4 and 5) which confirm that the sensors identified in Attachment A are used by DAS and are separate from those being used by the PMS and plant control system.

References 4 and 5 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.5.01.03e Completion Packages (References 6 and 7, 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. SV3(4)-DAS-J7-001, Diverse Actuation System - System Specification Document
2. SV3(4)-DAS-J0-001, Diverse Actuation System (DAS) Sensor Flow and indication Architecture
3. Procedure XXX, Unit 3(4) DAS Input Sensor Installation Inspection
4. Unit 3 Principal Closure Document XXX Unit 3
5. Unit 4 Principal Closure Document YYY Unit 4
6. 2.5.01.03e-U3-CP-Rev 0, ITAAC Completion Package
7. 2.5.01.03e-U4-CP-Rev 0, ITAAC Completion Package
8. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A
Excerpt from COL Table 2.5.1-3

Equipment Name	Tag Number
Reactor Coolant System (RCS) Hot Leg Temperature	RCS-300A
RCS Hot Leg Temperature	RCS-300B
Steam Generator 1 Wide-range Level	SGS-044
Steam Generator 1 Wide-range Level	SGS-045
Steam Generator 2 Wide-range Level	SGS-046
Steam Generator 2 Wide-range Level	SGS-047
Pressurizer Water Level	RCS-305A
Pressurizer Water Level	RCS-305B
Containment Temperature	VCS-053A
Containment Temperature	VCS-053B
Core Exit Temperature	IIS-009
Core Exit Temperature	IIS-013
Core Exit Temperature	IIS-030
Core Exit Temperature	IIS-034
Rod Control Motor Generator Voltage	PLS-001
Rod Control Motor Generator Voltage	PLS-002