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Docket Nos.: 52-025  
52-026

Michael J. Yox  
Regulatory Affairs Director  
Vogtle 3 & 4

7825 River Road  
Waynesboro, GA 30830  
706-848-6459 tel

ND-19-0350  
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission  
Document Control Desk  
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.2.6.09.02 [Index Number 659]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of April 15, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item C.2.6.09.02 [Index Number 659] 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.2.6.09.02 [Index Number 659]

MJY/RLB/sfr

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To:

**Southern Nuclear Operating Company/ Georgia Power Company**

Mr. D. A. Bost (w/o enclosures)

Mr. D. L. McKinney (w/o enclosures)

Mr. M. D. Meier (w/o enclosures)

Mr. D. H. Jones (w/o enclosures)

Mr. J. B. Klecha

Mr. G. Chick

Mr. M. J. Yox

Mr. A. S. Parton

Ms. K. A. Roberts

Mr. T. G. Petrak

Mr. W. A. Sparkman

Mr. C. T. Defnall

Mr. C. E. Morrow

Mr. J. L. Hughes

Ms. K. M. Stacy

Ms. A. C. Chamberlain

Mr. J. C. Haswell

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cc:

**Nuclear Regulatory Commission**

Mr. W. Jones (w/o enclosures)

Mr. F. D. Brown

Ms. J. M. Heisserer

Mr. C. P. Patel

Mr. G. J. Khouri

Ms. S. E. Temple

Mr. N. D. Karlovich

Mr. A. J. Lerch

Mr. C. J. Even

Mr. B. J. Kemker

Ms. N. C. Coovert

Mr. C. Welch

Mr. I. Cozens

Mr. J. Gaslevic

Mr. V. Hall

**Oglethorpe Power Corporation**

Mr. R. B. Brinkman

Mr. E. Rasmussen

**Municipal Electric Authority of Georgia**

Mr. J. E. Fuller

Mr. S. M. Jackson

**Dalton Utilities**

Mr. T. Bundros

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**Westinghouse Electric Company, LLC**

Dr. L. Oriani (w/o enclosures)

Mr. D. C. Durham (w/o enclosures)

Mr. M. M. Corletti

Ms. L. G. Iller

Ms. J. Monahan

Mr. J. L. Coward

**Other**

Mr. J. E. Hesler, *Bechtel Power Corporation*

Ms. L. Matis, *Tetra Tech NUS, Inc.*

Dr. W. R. Jacobs, Jr., Ph.D., *GDS Associates, Inc.*

Mr. S. Roetger, *Georgia Public Service Commission*

Ms. S. W. Kernizan, *Georgia Public Service Commission*

Mr. K. C. Greene, *Troutman Sanders*

Mr. S. Blanton, *Balch Bingham*

**Southern Nuclear Operating Company  
ND-19-0350  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 & Unit 4  
Completion Plan for Uncompleted ITAAC C.2.6.09.02 [Index Number 659]**

## **ITAAC Statement**

### **Design Commitment**

2. Physical barriers for the protected area perimeter are not part of vital area barriers.

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

An inspection of the protected area perimeter barrier will be performed.

### **Acceptance Criteria**

Physical barriers at the perimeter of the protected area are separated from any other barrier designated as a vital area barrier.

## **ITAAC Completion Description**

An inspection of the VEGP Unit 3 (Unit 4) protected area perimeter barrier is performed to verify that physical barriers at the perimeter of the protected area are separated from any other Unit 3 (Unit 4) barrier designated as a vital area barrier and satisfy the applicable protected area perimeter physical barrier physical separation requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR 73.55(e)(8)(i)(C). The VEGP Unit 3 (Unit 4) Plant Security System ITAACs only cover the Unit 3 (Unit 4) plant security system design commitment scope.

The inspection is performed per Procedure XXX (Reference 1) and involves a review of approved construction drawings and performance of walkdowns to verify that the Unit 3 (Unit 4) protected area perimeter physical barriers are physically separated from Unit 3 (Unit 4) vital area barriers.

The results of the inspection are documented in Reference 1 and verify that the Unit 3 (Unit 4) physical barriers at the perimeter of the protected area are separated from any other Unit 3 (Unit 4) barrier designated as a vital area barrier.

Reference 1 is available for NRC inspection as part of the Unit 3 (Unit 4) ITAAC C.2.6.09.02 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 Separation Inspection
2. C.2.6.09.02-U3-CP-Rev 0, ITAAC Completion Package
3. C.2.6.09.02-U4-CP-Rev 0, ITAAC Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"