

MAY 10 2019

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706-848-6459 telDocket Nos.: 52-025  
52-026ND-19-0570  
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 2.3.11.03c [Index Number 455]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of May 6, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.3.11.03c [Index Number 455] 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 2.3.11.03c [Index Number 455]

MJY/DLW/sfr

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**Southern Nuclear Operating Company  
ND-19-0570  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.3.11.03c [Index Number 455]**

## **ITAAC Statement**

### **Design Commitment**

3.c) The WGS is purged with nitrogen on indication of high oxygen levels in the system.

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

Tests will be performed to confirm that the presence of a simulated high oxygen level signal from the oxygen monitors (WGS-025A, -025B) causes the nitrogen purge valve (WGS-PL-V002) to open and the WLS degasifier vacuum pumps (WLS-MP-03A, -03B) to stop.

### **Acceptance Criteria**

A simulated high oxygen level signal causes the nitrogen purge valve (WGS-PL-V002) to open and the WLS degasifier vacuum pumps (WLS-MP-03A, -03B) to stop.

## **ITAAC Completion Description**

Testing is performed in accordance with preoperational test procedures 3-WLS-ITPP-501 and 4-WLS-ITPP-501 (References 1 and 2) to demonstrate that when a high oxygen level is simulated from the oxygen monitors (WGS-25A, -025B) the nitrogen purge valve (WGS-PL-V002) opens and the Liquid Radwaste System (WLS) degasifier vacuum pumps (WLS-MP-03A, 03B) stop.

References 1 and 2 ensure the WLS is aligned per the operating procedure, oxygen monitor B is removed from service, and that both WLS Degasifier Vacuum Pumps are ON. Oxygen flow is initiated to the Waste Gas System (WGS) sample package and when oxygen analyzer, WGS-025A, detects high-2 oxygen levels, WGS-PL-V002 is verified to open and both WLS Degasifier Vacuum Pumps are verified to have stopped using main control room indication. This test is then repeated using the B oxygen monitor, WGS-025B.

The results of this testing confirm that a simulated high oxygen level signal causes the nitrogen purge valve (WGS-PL-V002) to open and the WLS degasifier vacuum pumps (WLS-MP-03A, -03B) to stop.

References 1 and 2 are available for NRC inspection as part of Unit 3 and Unit 4 ITAAC 2.3.11.03c 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-WLS-ITPP-501, "Liquid Radwaste System Acceptance Test"
2. 4-WLS-ITPP-501, "Liquid Radwaste System Acceptance Test"
3. 2.3.11.03c-U3-CP-Rev0, ITAAC Completion Package
4. 2.3.11.03c-U4-CP-Rev0, ITAAC Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"