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52-026ND-19-0499
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 3.3.00.13 [Index Number 819]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of May 7, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 3.3.00.13 [Index Number 819] 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

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Completion Plan for Uncompleted ITAAC 3.3.00.13 [Index Number 819]

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**Southern Nuclear Operating Company
ND-19-0499
Enclosure**

**Vogle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 3.3.00.13 [Index Number 819]**

ITAAC Statement

Design Commitment

13. Separation is provided between the structural elements of the turbine and annex buildings and the nuclear island structure. This separation permits horizontal motion of the buildings in the safe shutdown earthquake without impact between structural elements of the buildings.

Inspections/Tests/Analyses

An inspection of the separation of the nuclear island from the annex and turbine building structures will be performed. The inspection will verify the specified horizontal clearance between structural elements of the adjacent buildings, consisting of the reinforced concrete walls and slabs, structural steel columns and floor beams.

Acceptance Criteria

The minimum horizontal clearance above floor elevation 100'-0" between the structural elements of the annex building and the nuclear island is 3 inches. The minimum horizontal clearance above floor elevation 100'-0" between the structural elements of the turbine building and the nuclear island is 3 inches.

ITAAC Completion Description

An inspection is performed to demonstrate separation of the nuclear island from the annex and turbine building structures. This separation permits horizontal motion of the buildings in the safe shutdown earthquake without impact between structural elements of the buildings. The inspection verifies the specified horizontal clearances between structural elements of the nuclear island and adjacent annex and turbine buildings. The structural elements consist of reinforced concrete walls and slabs, structural steel columns and floor beams. The subject ITAAC requires that the minimum horizontal clearance above floor elevation 100'-0" between the structural elements of the annex or turbine building and the nuclear island is 3 inches.

The inspections are performed on the as-built structures in accordance with the requirements of measurement guideline APP-GW-IT-001 (Reference 1), which identifies the location and frequency of inspection points for determining separation distance, to ensure the resulting measurements are representative of the entire section being inspected. The measurements are based on the size and construction type of each section. Measurements are taken using survey equipment in accordance with site survey procedures (Reference 2).

The inspection results are contained in the Unit 3 and Unit 4 Seismic Separation Inspection Reports (References 3 and 4, respectively) and verify that the minimum horizontal clearance above floor elevation 100'-0" between the structural elements of the annex buildings and the nuclear island is 3 inches and that the minimum horizontal clearance above floor elevation 100'-0" between the structural elements of the turbine building and the nuclear island is 3 inches.

References 1 through 4 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 3.3.00.13 Completion Packages (References 5 and 6, respectively).

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. APP-GW-IT-001, Revision 0, "Guidelines for Concrete Wall and Slab Thickness Measurements"
2. 26139-000-4MP-T81C-N3201, Revision 4, "Construction Survey"
3. SV3-1000-ITR-800819, "Seismic Separation Inspection Report (Unit 3)"
4. SV4-1000-ITR-800819, "Seismic Separation Inspection Report (Unit 4)"
5. 3.3.00.13-U3-CP-Rev0, ITAAC Completion Package
6. 3.3.00.13-U4-CP-Rev0, ITAAC Completion Package
7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"