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52-026ND-19-0652  
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 2.7.05.02.i [Index Number 719]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of April 25, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.7.05.02.i [Index Number 719] 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.

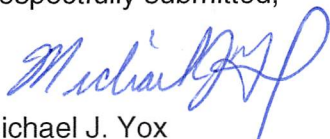
Southern Nuclear Operating Company (SNC) previously submitted, via letter ND-19-0525 [ML19122A098], a Unit 3 and Unit 4 Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load for Item 2.7.05.02.i [Index Number 719]. This resubmittal supersedes the previous Unit 3 and Unit 4 notice in its entirety.

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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Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.7.05.02.i [Index Number 719]

MJY/DLW/sfr

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**Southern Nuclear Operating Company  
ND-19-0652  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.7.05.02.i [Index Number 719]**

## **ITAAC Statement**

### **Design Commitment**

2. The VAS maintains each building area at a slightly negative pressure relative to the atmosphere or adjacent clean plant areas.
3. Displays of the parameters identified in Table 2.7.5-1 can be retrieved in the MCR.

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

- i) Testing will be performed to confirm that the VAS maintains each building at a slightly negative pressure when operating all VAS supply AHUs and all VAS exhaust fans.
- ii) Testing will be performed to confirm the ventilation flow rate through the auxiliary building fuel handling and rail car bay/solid radwaste system areas when operating all VAS supply AHUs and all VAS exhaust fans.
- iii) Testing will be performed to confirm the auxiliary building radiologically controlled area ventilation flow rate when operating all VAS supply AHUs and all VAS exhaust fans.

Inspection will be performed for retrievability of the parameters in the MCR.

### **Acceptance Criteria**

- i) The time average pressure differential in the served areas of the annex, fuel handling and radiologically controlled auxiliary buildings as measured by each of the instruments identified in Table 2.7.5-1 is negative.
- ii) A report exists and concludes that the calculated exhaust flow rate based on the measured flow rates is greater than or equal to 10,710 cfm.
- iii) A report exists and concludes that the calculated exhaust flow rate based on the measured flow rates is greater than or equal to 22,500 cfm.

The displays identified in Table 2.7.5-1 can be retrieved in the MCR.

### **ITAAC Completion Description**

The subject ITAAC verifies that the time average pressure differential in the served areas of the annex, fuel handling and radiologically controlled auxiliary buildings as measured by each of the instruments identified in VEGP Combined License (COL) Appendix C Table 2.7.5-1 (Attachment A) is negative and that displays of the parameters identified in Attachment A can be retrieved in the Main Control Room (MCR). Testing is performed to verify that a report exists and concludes that the calculated exhaust flow rate based on the measured flow rates is greater than or equal to 10,710 cfm through the auxiliary building fuel handling and rail car bay/solid radwaste system areas when operating all Radiologically Controlled Area Ventilation System (VAS) supply Air

Handling Units (AHUs) and all VAS exhaust fans, and that a report exists and concludes that the calculated exhaust flow rate based on the measured flow rates is greater than or equal to 22,500 cfm through the auxiliary building radiologically controlled area when operating all VAS supply AHUs and all VAS exhaust fans.

i) The time average pressure differential in the served areas of the annex, fuel handling and radiologically controlled auxiliary buildings as measured by each of the instruments identified in Table 2.7.5-1 is negative.

Testing is performed in accordance with preoperational test procedures 3-VAS-ITPP-501 and 4-VAS-ITPP-501 (References 1 and 2) to confirm the time average pressure differential in the served areas of the annex, fuel handling and radiologically controlled auxiliary buildings as measured by each of the instruments identified in Attachment A is negative.

Testing begins by verifying the Annex/Auxiliary Building Ventilation System, the Fuel Handling Area (FHA) Ventilation System, unit heaters, unit coolers, duct heaters and humidifiers are in service. An Ovation trend is established using the instruments in Attachment A and the test is run for a minimum of 12 hours. The calculated average value for each instrument is recorded in Reference 1 and 2, and verified to meet the acceptance criteria.

The results of the testing confirm that the time average pressure differential in the served areas of the annex, fuel handling and radiologically controlled auxiliary buildings as measured by each of the instruments identified in Table 2.7.5-1 is negative for Unit 3 and Unit 4.

ii) A report exists and concludes that the calculated exhaust flow rate based on the measured flow rates is greater than or equal to 10,710 cfm.

Testing is performed in accordance with preoperational test procedures 3-VAS-ITPP-501 and 4-VAS-ITPP-501 (References 1 and 2) to confirm that the calculated exhaust flow rate based on the measured flow rates through the auxiliary building fuel handling and rail car bay/solid radwaste system areas when operating all VAS supply AHUs and all VAS exhaust fans is greater than or equal to 10,710 cfm.

Following completion of the Annex/Auxiliary Building Ventilation System flow balance (references 5 and 6), the exhaust branch flowrates for the auxiliary building fuel handling and rail car bay/solid radwaste system are measured using appropriate flow measurement equipment. The flow balance and final exhaust branch flowrate measurements are performed with all VAS supply AHUs and all VAS exhaust fans in service. The total exhaust flow rate is calculated based on the sum of the measured exhaust branch flowrates and is documented in References 1 and 2.

The exhaust flow rate for Unit 3 is XX,XXX cfm and the exhaust flow rate for Unit 4 is YY,YYY cfm which confirms that a report exists and concludes that the calculated exhaust flow rate based on the measured flow rates is greater than or equal to 10,710 cfm.

iii) A report exists and concludes that the calculated exhaust flow rate based on the measured flow rates is greater than or equal to 22,500 cfm.

Testing is performed in accordance with preoperational test procedures 3-VAS-ITPP-501 and 4-VAS-ITPP-501 (References 1 and 2) to confirm that the calculated exhaust flow rate based on

the measured flow rates through the auxiliary building radiologically controlled area when operating all VAS supply AHUs and all VAS exhaust fans is greater than or equal to 22,500 cfm.

Following completion of the Annex/Auxiliary Building Ventilation System flow balance (references 5 and 6), the exhaust branch flowrates for the auxiliary building radiologically controlled area are measured using appropriate flow measurement equipment. The flow balance and final exhaust branch flowrate measurements are performed with all VAS supply AHUs and all VAS exhaust fans in service. The total exhaust flow rate is calculated based on the sum of the measured exhaust branch flowrates and is documented in References 1 and 2.

The exhaust flow rate for Unit 3 is XX,XXX cfm and the exhaust flow rate for Unit 4 is YY,YYY cfm which confirms that a report exists and concludes that the calculated exhaust flow rate based on the measured flow rates is greater than or equal to 22,500 cfm.

The displays identified in Table 2.7.5-1 can be retrieved in the MCR.

An inspection is performed to verify the retrievability of the Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 plant parameters in the Main Control Room (MCR). The inspection for retrievability confirms that the displays of the parameters identified in Combined License (COL) Appendix C Table 2.7.5-1 (Attachment A) can be retrieved in the MCR.

The inspection is performed in accordance with the Unit 3 and Unit 4 component test package work orders (References 3 and 4) and visually confirms that when each of the displays of parameters identified in Attachment A is summoned at an MCR workstation, the summoned plant parameter appears on a display monitor at that MCR workstation.

The results from References 3 and 4 confirm that the Unit 3 and Unit 4 plant parameter displays identified in Table 2.7.5-1 can be retrieved in the MCR.

The results of the testing and inspections confirm that for Unit 3 and Unit 4, the time average pressure differential in the served areas of the annex, fuel handling and radiologically controlled auxiliary buildings as measured by each of the instruments identified in Table 2.7.5-1 is negative, a report exists and concludes that the calculated exhaust flow rate based on the measured flow rates is greater than or equal to 10,710 cfm, a report exists and concludes that the calculated exhaust flow rate based on the measured flow rates is greater than or equal to 22,500 cfm, and the displays identified in Table 2.7.5-1 can be retrieved in the MCR.

References 1 thru 6 are available for NRC inspection as part of Unit 3 and Unit 4 ITAAC 2.7.05.02.i Completion Packages (Reference 7 and 8).

### **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-VAS-ITPP-501, "Radiologically Controlled Area Ventilation System Preoperational test"
2. 4-VAS-ITPP-501, "Radiologically Controlled Area Ventilation System Preoperational test"
3. SNC922113, "Radiologically Controlled Area Ventilation System Display Verifications – ITAAC: SV3-2.7.05.02.i Item 3"
4. SNCYYYYYY, "Radiologically Controlled Area Ventilation System Display Verifications – ITAAC: SV4-2.7.05.02.i Item 3"
5. 3-GEN-ITPP-521, "HVAC Final Air Balancing"
6. 4-GEN-ITPP-521, "HVAC Final Air Balancing"
7. 2.7.05.02.i-U3-CP-Rev0, ITAAC Completion Package
8. 2.7.05.02.i-U4-CP-Rev0, ITAAC Completion Package
9. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Attachment A**

Excerpt from Unit 3 and Unit 4 COL Appendix C Table 2.7.5-1\*

<b>UNIT</b>	<b>Equipment*</b>	<b>Tag No.*</b>	<b>Display*</b>	<b>Average Pressure</b>
3	*Fuel Handling Area Pressure Differential Indicator	*VAS-030	*Yes	-0.XX in wg
3	*Annex Building Pressure Differential Indicator	*VAS-032	*Yes	-0.XX in wg
3	*Auxiliary Building Pressure Differential Indicator	*VAS-033	*Yes	-0.XX in wg
3	*Auxiliary Building Pressure Differential Indicator	*VAS-034	*Yes	-0.XX in wg
4	*Fuel Handling Area Pressure Differential Indicator	*VAS-030	*Yes	-0.XX in wg
4	*Annex Building Pressure Differential Indicator	*VAS-032	*Yes	-0.XX in wg
4	*Auxiliary Building Pressure Differential Indicator	*VAS-033	*Yes	-0.XX in wg
4	*Auxiliary Building Pressure Differential Indicator	*VAS-034	*Yes	-0.XX in wg