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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 2.1.03.02a [Index Number 69]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of May 30, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.1.03.02a [Index Number 69] 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-16-2145 [ML16307A326], a Unit 3 Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load for Item 2.1.03.02a [Index Number 69]. This resubmittal supersedes the previous Unit 3 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

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.1.03.02a [Index Number 69]
MJY/GDL/sfr

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**Southern Nuclear Operating Company
ND-18-0938
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.1.03.02a [Index Number 69]**

ITAAC Statement

Design Commitment:

2.a) The reactor upper internals rod guide arrangement is as shown in Figure 2.1.3-1.

2.b) The control assemblies (rod cluster and gray rod) and drive rod arrangement is as shown in Figure 2.1.3-2.

Inspections, Tests, Analyses:

Inspection of the as-built system will be performed.

Inspection of the as-built system will be performed.

Acceptance Criteria:

The as-built RXS will accommodate the fuel assembly and control rod drive mechanism pattern shown in Figure 2.1.3-1.

The as-built RXS will accommodate the control assemblies (rod cluster and gray rod) and drive rod arrangement shown in Figure 2.1.3-2.

ITAAC Completion Description

This ITAAC requires inspections be performed of the as-built Reactor System (RXS) to verify the reactor upper internals rod guide pattern is as shown in VEGP Unit 3 and Unit 4 Combined License (COL) Appendix C Figure 2.1.3-1 (Attachment A) and the control assemblies (rod cluster and gray rod) and drive rod arrangement is as shown in COL Appendix C Figure 2.1.3-2 (Attachment B).

An inspection (walkdown) of the as-built RXS is performed to verify that the reactor upper internals rod guide pattern is as shown in Figure 2.1.3-1 (Attachment A) and that the control assemblies (rod cluster and gray rod) and drive rod arrangement is as shown in Figure 2.1.3-2 (Attachment B). Additionally, the walkdown includes a review of inspection records that document the as-built dimensions of the Reactor Vessel Internals shown on Figure 2.1.3-2 (Attachment C). The walkdown is completed in accordance with NCSP 02-24 (Reference 1), which requires the preparation of a detailed inspection plan. This plan includes the use of detailed drawings to perform visual observations and compare the as-built system of the reactor upper internals control rod guide arrangement, control rod assemblies and drive rod arrangement.

Dimensional inspections are performed at the vendor's facility and on-site prior to final installation using both standard industry measurement techniques and specialized equipment. Due to the nature of the manufacturing process of the reactor vessel head and internals, it is necessary to verify measurements are within the acceptable ITAAC ranges prior to shipment and final installation. Completion of reactor vessel head and internal measurements at the vendor's facility and on-site prior to final installation is standard industry practice and is specified in the procurement specification. Completing these measurements at the vendor's facility and

on-site meets the definition of "as-built inspections" per NEI 08-01, Section 9.5, "As-built" Inspections (Reference 2).

The inspection results are documented in the Principal Closure Documents XXX (References 3 and 4) supporting the ITAAC 2.1.03.02a Completion Packages (References 5 and 6) and confirm that the Unit 3 and Unit 4 as-built RXS will accommodate the fuel assembly and control rod drive mechanism pattern shown in Figure 2.1.3-1 and will accommodate the control assemblies (rod cluster and gray rod) and drive rod arrangement shown in Figure 2.1.3-2. Principal Closure Documents XXX (References 3 and 4) are available for NRC inspection as part of the ITAAC 2.1.03.02a Completion Packages (Reference 5 and 6).

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. NCSP 02-24, Rev 03.00, "ITAAC Support Activities (AP1000)"
2. NEI 08-01, Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52
3. Principal Closure Document (Unit 3)
4. Principal Closure Document (Unit 4)
5. 2.1.03.02a-U3-CP-Rev0, ITAAC Completion Package
6. 2.1.03.02a-U4-CP-Rev0, ITAAC Completion Package

Attachment A: COL Appendix C Figure 2.1.3-1

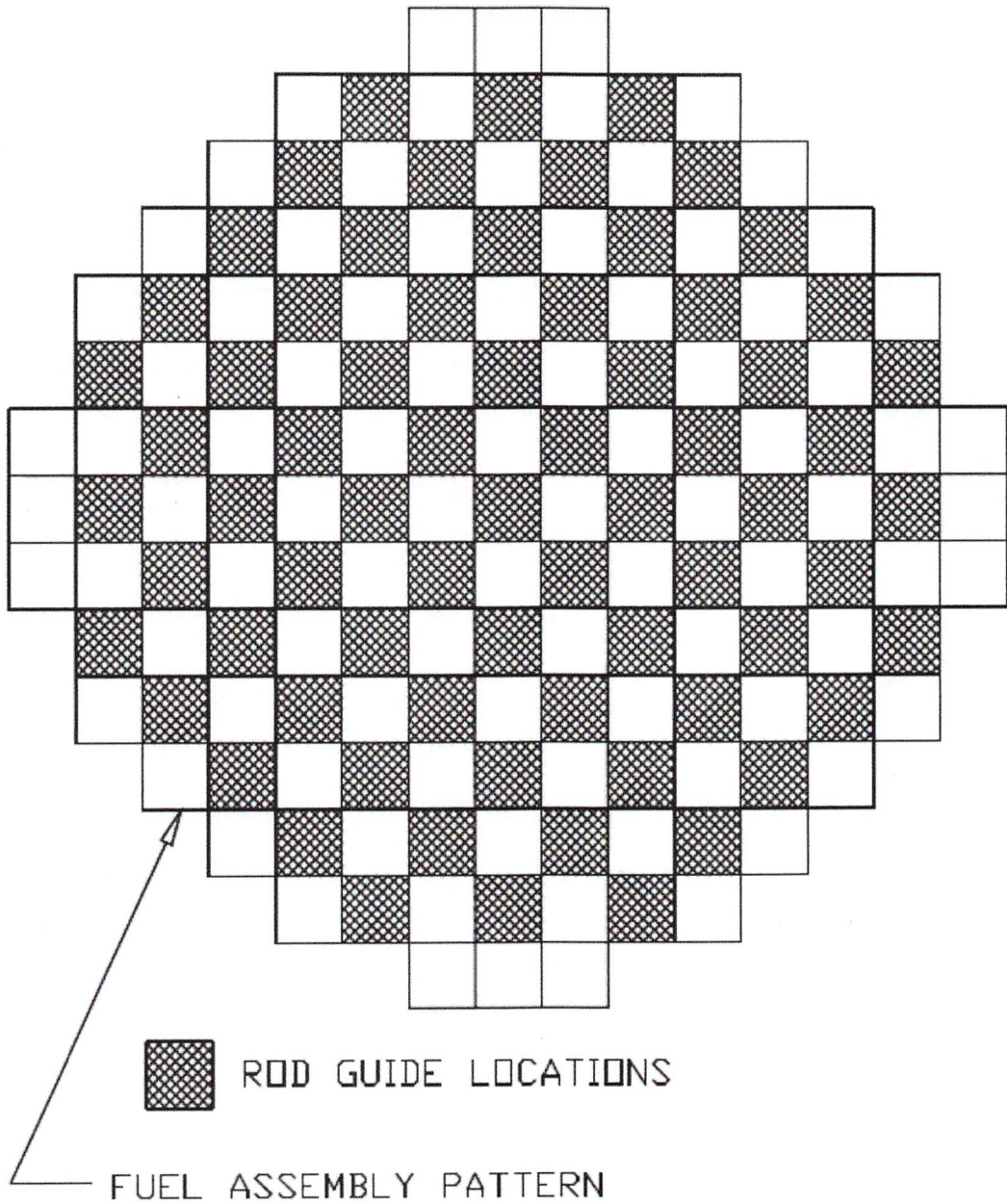


Figure 2.1.3-1
Reactor Upper Internals Rod Guide Arrangement

Attachment B: COL Appendix C Figure 2.1.3-2

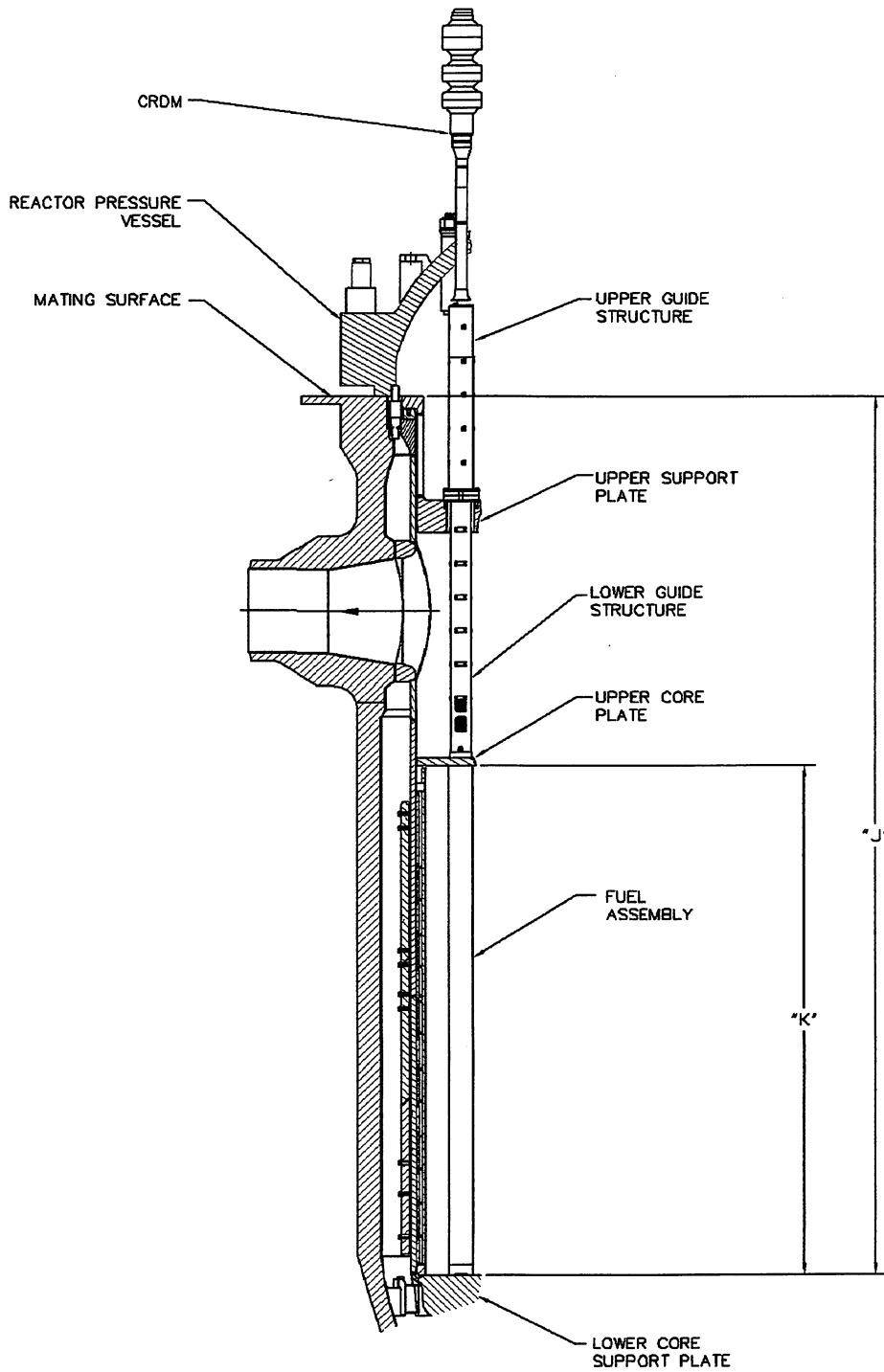


Figure 2.1.3-2
Rod Cluster Control and Drive Rod Arrangement

Attachment C

Excerpt from COL Appendix C Table 2.1.3-4*

Table 2.1.3-4*				
Key Dimensions and Acceptable Variations of the Reactor Vessel Internals				
(Figure 2.1.3-2)				
Description*	Dimension or Elevation* (inches)	Nominal Value* (inches)	Acceptable Variation* (inches)	QR & C of C Values – Min. to Max (inches)
Elevation from RV mating surface to top of lower core support plate	J	327.3	+0.50/-0.50	327.XX – 327.XX
Separation distance between bottom of upper core plate and top of lower core support with RV head in place	K	189.8	+0.20/-0.20	189.XX – 189.XX