

MAY 31 2019

Docket Nos.: 52-025
52-026ND-19-0661
10 CFR 52.99(c)(3)U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3 and Unit 4
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load
Item 2.3.11.03b [Index Number 454]

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 2.3.11.03b [Index Number 454] 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 & 4Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.3.11.03b [Index Number 454]

MJY/DLW/sfr

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ND-19-0661

Page 2 of 3

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U.S. Nuclear Regulatory Commission

ND-19-0661

Page 3 of 3

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**Southern Nuclear Operating Company
ND-19-0661
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.3.11.03b [Index Number 454]**

ITAAC Statement

Design Commitment

3.b) The WGS provides the nonsafety-related function of controlling the releases of radioactive materials in gaseous effluents.

Inspections/Tests/Analyses

Tests will be performed to confirm that the presence of a simulated high radiation signal from the discharge radiation monitor, WGS-017, causes the discharge control isolation valve WGS-PL-V051 to close.

Acceptance Criteria

A simulated high radiation signal causes the discharge control isolation valve WGS-PL-V051 to close.

ITAAC Completion Description

Testing is performed to confirm the Gaseous Radwaste System (WGS) provides the nonsafety-related function of controlling the releases of radioactive materials in gaseous effluents by verifying a simulated high radiation signal causes the discharge control isolation valve WGS-PL-V051 to close.

Testing is performed in accordance with the Unit 3 and Unit 4 component test packages SNC922146 and SNCXXXXXX (References 1 and 2), by verifying WGS-PL-V051 is initially open. The test simulates a high radiation signal on the discharge radiation monitor, WGS-PL-V051 is verified to close on the Plant Control System (PLS) monitor in the Main Control Room and verification is documented in the component test package.

This testing verifies that a simulated high radiation signal causes the discharge control isolation valve WGS-PL-V051 to close.

References 1 and 2 are available for NRC inspection as part of Unit 3 and Unit 4 ITAAC 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. SNC922146, "Waste Gas System Verification ITAAC: SV3-ITAAC-ST-2.3.11.03b"
2. SNCXXXXXX, "Waste Gas System Verification ITAAC: SV4-ITAAC-ST-2.3.11.03b"
3. 2.3.11.03b-U3-CP-Rev 0, ITAAC Completion Package
4. 2.3.11.03b-U4-CP-Rev 0, ITAAC Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"