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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 2.2.01.11a.iv [Index Number 117]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of May 23, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.01.11a.iv [Index Number 117] 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-19-0416 [ML19130A111], a Unit 3 and Unit 4 Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load for Item 2.2.01.11a.iv [Index Number 117]. 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

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.01.11a.iv [Index Number 117]

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Southern Nuclear Operating Company
ND-19-0649
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.01.11a.iv [Index Number 117]

ITAAC Statement

Design Commitment

11.a) The motor-operated and check valves identified in Table 2.2.1-1 perform an active safety-related function to change position as indicated in the table.

Inspections/Tests/Analyses

iv) Exercise testing of the check valves with active safety functions identified in Table 2.2.1-1 will be performed under preoperational test pressure, temperature and fluid flow conditions.

Acceptance Criteria

iv) Each check valve changes position as indicated in Table 2.2.1-1.

ITAAC Completion Description

Multiple ITAAC are performed with inspections and tests to verify the motor-operated and check valves identified in VEGP Combined License (COL) Appendix C Table 2.2.1-1 (Attachment A) perform an active safety-related function to change position as indicated in the table under preoperational test pressure, temperature and flow conditions. This ITAAC performs testing to verify the check valves change position as indicated in Attachment A.

Testing is performed in accordance with the following Unit 3 and Unit 4 preoperational test procedures 3/4-CAS-ITPP-501 (References 1 and 2), 3/4-CCS-ITPP-501 (References 3 and 4), 3/4-DWS-ITPP-501 (References 5 and 6), 3/4-FPS-ITPP-501 (References 7 and 8), 3/4-SFS-ITPP-502 (References 9 and 10), 3/4-VFS-ITPP-501 (References 11 and 12), and 3/4-VWS-ITPP-501 (References 13 and 14). This testing verifies that each check valve changes position as indicated in Attachment A.

References 1 and 2 establish the initial conditions of Compressed and Instrument Air System (CAS) pressurizing the instrument and service air piping and installs temporary pressure indications upstream and downstream of CAS-PL-V015. This section of the system piping is depicted in Piping and Instrument Drawing (P&ID) CAS-M6-005 and 012. Pressurizing the CAS piping downstream of the containment isolation check valve demonstrates the containment isolation check valve opens. The instrument air line is manually isolated and a test connection upstream of check valve CAS-PL-V015 is opened. The differential pressure created closes CAS-PL-V015, which is locally verified to transfer closed by differential pressure indication. This same methodology is utilized to test the service air supply inside containment isolation check valve, CAS-PL-V205.

References 3 and 4 initial conditions have the Component Cooling Water System (CCS) in service supplying containment loads which demonstrates the containment isolation check valve is open. The testing then directs performance of the Component Cooling Water System (CCS) Check Valve Exercise, which closes a manual valve upstream and downstream of CCS-PL-V201. Demineralized water is connected to a test connection downstream of CCS-PL-V201 thereby pressurizing the piping downstream of CCS-PL-V201. A test connection upstream of CCS-PL-V201 is opened, creating a differential pressure across the valve, and flow rate is monitored at this test connection. When flow rate stabilizes, the reading is recorded and verified to be < 1 gpm. This value confirms that CCS-PL-V201 transfers closed. This section of the

system piping is depicted in P&ID CCS-M6-002. References 7, 8, 13 and 14 use this same methodology for valves FPS-PL-V052 (depicted in P&ID FPS-M6-004), and VWS-PL-V062 (depicted in P&ID VWS-M6-003). Prior to initiating the check valve exercise test, the Fire Protection System (FPS) and Central Chilled Water System (VWS) are aligned and in service to supply containment loads which demonstrates that the containment isolation check valves for FPS and VWS are opened.

References 5 and 6 initial conditions align and place the Demineralized Water Transfer and Storage System (DWS) in service to containment which demonstrates the containment isolation check valve is open. The testing then directs performance of the DWS Check Valve Exercise which closes upstream and downstream isolation valves and drains the isolated demineralized water piping. A test connection upstream of DWS-PL-V245 is opened and a metered air supply is connected to a test connection downstream of DWS-PL-V245. When pressure has stabilized the flow reading is taken and verified to be less than the local leak rate limit which confirms that the valve transfers closed. This section of the system piping is depicted in P&ID DWS-M6-007.

References 9 and 10 initial conditions establish Spent Fuel Pool Cooling System (SFS) flow to containment which demonstrates the containment isolation check valve is open. The testing then directs the closure of SFS Discharge line Containment Isolation Motor-Operated Valve – Outside Reactor Containment, SFS-PL-V038, which is upstream of SFS-PL-037. Then a test connection is opened between SFS-PL-V038 and SFS-PL-037. This creates a differential pressure across SFS-PL-V037, with the higher pressure being downstream of SFS-PL-V037. The flow from the test connection to a measuring container is timed. After more than one minute, the test connection valve is closed, and the volume of water is documented. The leakage rate on the upstream side of SFS-PL-V037 is calculated and verified to be < 1 gpm. This section of the system piping is depicted in P&ID SFS-M6-001. This value confirms that SFS-PL-V037 transfers closed.

References 11 and 12 direct the performance of the Containment Air Filtration System (VFS) Vacuum Relief Valve Test and Check Valve Exercise to verify Vacuum Relief Containment Isolation Check Valves, VFS-PL-V803A/B change positions as shown in Attachment A. A temporary air supply is hooked up and aligned to the containment air purge ducting outside containment, a blank flange is installed to block flow through VFS-PL-V803B, and system alignment is performed to direct air to VFS-PL-V803A. VFS-PL-803A is initially verified to be closed, the air supply is initiated and VFS-PL-803A is locally verified to fully open. The air supply is isolated and VFS-PL-V803A is locally verified to close. The blank flange is removed from VFS-PL-V803B and installed on VFS-PL-V803A and the testing is repeated for VFS-PL-V803B. This section of the system piping is depicted in P&ID VFS-M6-001.This testing verifies that VFS-PL-V803A/B transfer open and closed.

The combination of the test results confirms that each check valve changes position as indicated in Table 2.2.1-1.

References 1 through 14 are available for NRC inspection as part of Unit 3 and Unit 4 ITAAC Completion Packages (Reference 23 and 24).

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-CAS-ITPP-501, "Compressed and Instrument Airs Systems Preoperational Test Procedure"
2. 4-CAS-ITPP-501, "Compressed and Instrument Airs Systems Preoperational Test Procedure"
3. 3-CCS-ITPP-501, "Component Cooling Water System Preoperational Test Procedure"
4. 4-CCS-ITPP-501, "Component Cooling Water System Preoperational Test Procedure"
5. 3-DWS-ITPP-501, "Demineralized Water Acceptance Test"
6. 4-DWS-ITPP-501, "Demineralized Water Acceptance Test"
7. 3-FPS-ITPP-501, "Fire Protection Preoperational Test"
8. 4-FPS-ITPP-501, "Fire Protection Preoperational Test"
9. 3-SFS-ITPP-502, "Spent Fuel Pool Cooling System Flow Path Preoperational Test Procedure"
10. 4-SFS-ITPP-502, "Spent Fuel Pool Cooling System Flow Path Preoperational Test Procedure"
11. 3-VFS-ITPP-501, "Containment Air Filtration System Preoperational Test Procedure"
12. 4-VFS-ITPP-501, "Containment Air Filtration System Preoperational Test Procedure"
13. 3-VWS-ITPP-501, "Central Chilled Water System Preoperational Test"
14. 4-VWS-ITPP-501, "Central Chilled Water System Preoperational Test"
15. SV3/4-CAS-M6-005, "P&ID Compressed and Instrument Air System"
16. SV3/4-CAS-M6-012, "P&ID Compressed and Instrument Air System"
17. SV3/4-CCS-M6-002, "P&ID Component Cooling Water System"
18. SV3/4-DWS-M6-007, "P&ID Demineralized Water Transfer and Storage System"
19. SV3/4-SFS-M6-001, "P&ID Spent Fuel Pool Cooling System"
20. SV3/4-VFS-M6-001, "P&ID Containment Air Filtration System"
21. SV3/4-FPS-M6-004, "P&ID Fire Protection System"
22. SV3/4-VWS-M6-003, "P&ID Central Chilled Water System"
23. 2.2.01.11a.iv-U3-CP-Rev 0, ITAAC Completion Package
24. 2.2.01.11a.iv-U4-CP-Rev 0, ITAAC Completion Package
25. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

Excerpt from COL Appendix C Table 2.2.1-1

Equipment Name	Tag No.	Active Function
Service Air Supply Inside Containment Isolation Check Valve	CAS-PL-V205	Transfer Closed
Instrument Air Supply Inside Containment Isolation Check Valve	CAS-PL-V015	Transfer Closed
CCS Containment Isolation Check Valve – Inlet Line Inside Reactor Containment (IRC)	CCS-PL-V201	Transfer Closed
Demineralized Water Supply Containment Isolation Check Valve IRC	DWS-PL-V245	Transfer Closed
Fire Water Containment Isolation Supply Check Valve – Inside	FPS-PL-V052	Transfer Closed
Spent Fuel Pool Cooling System (SFS) Discharge Line Containment Isolation Check Valve – IRC	SFS-PL-V037	Transfer Closed
Vacuum Relief Containment Isolation Check Valve A – IRC	VFS-PL-V803A	Transfer Closed/ Transfer Open
Vacuum Relief Containment Isolation Check Valve B – IRC	VFS-PL-V803B	Transfer Closed/ Transfer Open
Fan Coolers Supply Containment Isolation Check Valve – IRC	VWS-PL-V062	Transfer Closed