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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 2.2.04.09a.ii [Index Number 241]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of June 10, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.04.09a.ii [Index Number 241] 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

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.04.09a.ii [Index Number 241]

MJY/DLW/sfr

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**Southern Nuclear Operating Company
ND-19-0680
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.04.09a.ii [Index Number 241]**

ITAAC Statement

Design Commitment

9.a) Components within the main steam system, main and startup feedwater system, and the main turbine system identified in Table 2.2.4-3 provide backup isolation of the SGS to limit steam generator blowdown and feedwater flow to the steam generator.

Inspections/Tests/Analyses

ii) Testing will be performed to confirm the trip of the pumps identified in Table 2.2.4-3.

Acceptance Criteria

ii) The pumps identified in Table 2.2.4-3 trip after a signal is generated by the PMS.

ITAAC Completion Description

Multiple ITAAC are performed to verify components within the main steam system, main and startup feedwater system, and the main turbine system identified in Table 2.2.4-3 provide backup isolation of the Steam Generator System (SGS) to limit steam generator blowdown and feedwater flow to the steam generator. The subject ITAAC performs testing to confirm the trip of the pumps identified in Combined License (COL) Appendix C Table 2.2.4-3 (Attachment A) after a trip is generated by the Protection and Safety Monitoring System (PMS).

Testing is performed in accordance with Unit 3 and Unit 4 component test packages SNCXXXXXX and SNCYYYYYY (References 1 and 2). These component test packages utilize B-GEN-ITPCI-039 (Reference 3) to direct the performance of test procedures 3/4-PMS-OTS-18-001 (References 4 and 5) to verify that the pumps in Attachment A trip after a signal is generated by the PMS.

References 4 and 5 establish initial conditions with each pump breaker in the test position and closed. An actuation signal is generated by PMS using the PMS Maintenance and Test Panel (MTP) to trip the pump breakers. Each breaker is verified locally to be open (trip position) after the receipt of the trip signal.

The completed Unit 3 and Unit 4 component test results (references 1 and 2) confirm that the pumps identified in Table 2.2.4-3 trip after a signal is generated by the PMS.

References 1 and 2 are available for NRC inspection as part of ITAAC 2.2.04.09a.ii Unit 3 and 4 Completion Packages (Reference 6 and 7).

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. SNCXXXXXX
2. SNCYYYYYY
3. B-GEN-ITPCI-039, "PMS CIM Component Test Procedure"
4. 3-PMS-OTS-18-001, "Engineered Safeguards Actuation System 24-Month Actuation Device Test"
5. 4-PMS-OTS-18-001, "Engineered Safeguards Actuation System 24-Month Actuation Device Test"
6. 2.2.04.09a.ii-U3-CP-Rev 0, ITAAC Completion Package
7. 2.2.04.09a.ii-U4-CP-Rev 0, ITAAC Completion Package
8. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

***Excerpt from COL Appendix C Table 2.2.4-3**

Table 2.2.4-3		
*Equipment Name	*Tag No.	*Control Function
Main Feedwater Pump	FWS-MP-02A	Trip
Main Feedwater Pump	FWS-MP-02B	Trip
Main Feedwater Pump	FWS-MP-02C	Trip
Startup Feedwater Pump	FWS-MP-03A	Trip
Startup Feedwater Pump	FWS-MP-03B	Trip