



JUN 12 2019

Michael J. Yox
Regulatory Affairs Director
Vogtle 3 & 4

7825 River Road
Waynesboro, GA 30830
706-848-6459 tel

Docket Nos.: 52-025
52-026

ND-19-0717
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3 and Unit 4
Resubmittal of Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load
Item 2.1.02.13b [Index Number 64]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of June 11, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) 2.1.02.13b [Index Number 64] 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 Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load for Item 2.1.02.13b [Index Number 64] ND-17-1130 [ML17186A040], dated June 30, 2017. This resubmittal supersedes ND-17-1130 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

U.S. Nuclear Regulatory Commission
ND-19-0717
Page 2 of 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.1.02.13b [Index Number 64]

MJY/DLW/sfr

To:

Southern Nuclear Operating Company/ Georgia Power Company

Mr. R.G. West (w/o enclosures)
Mr. D. L. McKinney (w/o enclosures)
Mr. M. D. Meier (w/o enclosures)
Mr. D. H. Jones (w/o enclosures)
Mr. J. B. Klecha
Mr. G. Chick
Mr. M. J. Yox
Mr. A. S. Parton
Ms. K. A. Roberts
Mr. T. G. Petrak
Mr. W. A. Sparkman
Mr. C. T. Defnall
Mr. C. E. Morrow
Mr. J. L. Hughes
Ms. K. M. Stacy
Ms. A. C. Chamberlain
Mr. J. C. Haswell
Document Services RTYPE: VND.LI.L06
File AR.01.02.06

cc:

Nuclear Regulatory Commission

Mr. W. Jones (w/o enclosures)
Mr. F. D. Brown
Mr. C. P. Patel
Mr. G. J. Khouri
Ms. S. E. Temple
Mr. N. D. Karlovich
Mr. A. Lerch
Mr. C. J. Even
Mr. B. J. Kemker
Ms. N. C. Coover
Mr. C. Welch
Mr. J. Gaslevic
Mr. V. Hall
Mr. G. Armstrong
Mr. T. Lamb
Mr. M. Webb
Mr. P. O'Bryan
Mr. T. Fredette
Mr. C. Weber

Oglethorpe Power Corporation

Mr. R. B. Brinkman
Mr. E. Rasmussen

Municipal Electric Authority of Georgia

Mr. J. E. Fuller

Mr. S. M. Jackson

Dalton Utilities

Mr. T. Bundros

Westinghouse Electric Company, LLC

Dr. L. Oriani (w/o enclosures)

Mr. D. C. Durham (w/o enclosures)

Mr. M. M. Corletti

Ms. L. G. Iller

Ms. J. Monahan

Mr. J. L. Coward

Other

Mr. J. E. Hesler, *Bechtel Power Corporation*

Ms. L. Matis, *Tetra Tech NUS, Inc.*

Dr. W. R. Jacobs, Jr., Ph.D., *GDS Associates, Inc.*

Mr. S. Roetger, *Georgia Public Service Commission*

Ms. S. W. Kernizan, *Georgia Public Service Commission*

Mr. K. C. Greene, *Troutman Sanders*

Mr. S. Blanton, *Balch Bingham*

**Southern Nuclear Operating Company
ND-19-0717
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.1.02.13b [Index Number 64]**

ITAAC Statement

Design Commitment:

13.b) The RCPs trip after receiving a signal from the PMS.

Inspection, Tests, Analyses:

Testing will be performed using real or simulated signals into the PMS.

Acceptance Criteria:

The RCPs trip after receiving a signal from the PMS.

ITAAC Completion Description

Testing is performed to verify the Reactor Coolant Pumps (RCPs) trip after receiving a signal from 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 confirm that the RCPs trip after a signal is generated by the PMS.

References 4 and 5 establish initial conditions with each RCP 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 RCP 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 each of the RCPs trip after a signal is generated by the PMS.

References 1 and 2 are available for NRC inspection as part of the ITAAC 2.1.02.13b 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. 2.1.02.13b-U3-CP-Rev 0, ITAAC Completion Package
7. 2.1.02.13b-U4-CP-Rev 0, ITAAC Completion Package
8. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"