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Docket Nos.: 52-025
52-026ND-19-0716
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 2.1.02.09c [Index Number 44]

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) 2.1.02.09c [Index Number 44] 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, later, provide additional notifications for ITAAC that have not been completed 225-days prior to initial fuel load.

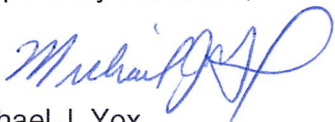
Southern Nuclear Operating Company (SNC) previously submitted Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load for Item 2.1.02.09c [Index Number 44] ND-18-0929 [ML18186A417], dated July 2, 2018. This resubmittal supersedes ND-18-0929 in its entirety.

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

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Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC ITAAC 2.1.02.09c [Index Number 44]

MJY/DLW/sfr

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**Southern Nuclear Operating Company
ND-19-0716
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.1.02.09c [Index Number 44]**

ITAAC Statement

Design Commitment:

9.c) The pressurizer heaters trip after a signal is generated by the PMS.

Inspection, Tests, Analyses:

Testing will be performed to confirm trip of the pressurizer heaters identified in Table 2.1.2-3.

Acceptance Criteria:

The pressurizer heaters identified in Table 2.1.2-3 trip after a signal is generated by the PMS.

ITAAC Completion Description

Testing is performed to demonstrate the pressurizer heaters trip after a signal is generated by the Protection and Safety Monitoring System (PMS). This testing confirms that the pressurizer heaters identified in Combined License (COL) Appendix C Table 2.1.2-3 (Attachment A) trip after a signal is generated by the 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 pressurizer heaters identified in Attachment A trip after a signal is generated by the PMS.

References 4 and 5 establish initial conditions with each pressurizer heater 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 pressurizer heater 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 pressurizer heaters identified in Table 2.1.2-3 trip after a signal is generated by the PMS.

References 1 and 2 are available for NRC inspection as part of the ITAAC 2.1.02.09c Completion Packages (Reference 6 and 7).

List of ITAAC Findings

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company 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. 2.1.02.09c-U3-CP-Rev 0, ITAAC Completion Package
7. 2.1.02.09c-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 Combined License Appendix C Table 2.1.2-3

*Equipment	*Tag No.	*Control Function
Pressurizer Heaters	RCS-EH-03	On/Off
Pressurizer Heaters	RCS-EH-04A	On/Off
Pressurizer Heaters	RCS-EH-04B	On/Off
Pressurizer Heaters	RCS-EH-04C	On/Off
Pressurizer Heaters	RCS-EH-04D	On/Off