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10 CFR 52.99(c)(3)

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

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 2.6.09.05c [Index Number 646]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of June 16, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.6.09.05c [Index Number 646] 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,

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Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 & Unit 4  
Completion Plan for Uncompleted ITAAC 2.6.09.05c [Index Number 646]

MJY/RLB/sfr

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**Southern Nuclear Operating Company  
ND-19-0713  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 & Unit 4  
Completion Plan for Uncompleted ITAAC 2.6.09.05c [Index Number 646]**

## **ITAAC Statement**

### **Design Commitment**

5.c) The central and secondary alarm stations are designed and equipped such that, in the event of a single act, in accordance with the design basis threat of radiological sabotage, the design enables the survivability of equipment needed to maintain the functional capability of either alarm station to detect and assess alarms and communicate with onsite and offsite response personnel.

### **Inspections/Tests/Analyses**

Inspections and/or analysis of the central and secondary alarm station will be performed.

### **Acceptance Criteria**

The central and secondary alarm stations are designed and equipped such that, in the event of a single act, in accordance with the design basis threat of radiological sabotage, equipment needed to maintain the functional capability of either alarm station to detect and assess alarms and communicate with onsite and offsite response personnel exists.

## **ITAAC Completion Description**

Inspections and analysis of the central alarm station (CAS) and the secondary alarm station (SAS) are performed to verify CAS and SAS are designed and equipped such that, in the event of a single act, in accordance with the design basis threat of radiological sabotage, equipment needed to maintain the functional capability of either alarm station to detect and assess alarms and communicate with onsite and offsite response personnel exists and satisfies the applicable single act, design basis threat requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR 73.55(i)(4)(i). The VEGP Unit 3 (Unit 4) Plant Security System ITAACs only cover the Unit 3 (Unit 4) plant security system design commitment scope. The CAS and SAS are common to both VEGP Unit 3 and Unit 4 and designed to be functionally equivalent and redundant, such that the functions needed to detect and assess alarms, and initiate response of both onsite and offsite security forces, is available in each location. The redundant design and spatial separation of CAS and SAS assure that no single act by the design basis threat described in 10 CFR 73.1(a)(1) and detailed in Regulatory Guide 5.69 (Reference 1), would disable both alarm stations.

Reference 2 performs a standard plant single act design assessment of CAS and SAS to verify that the AP1000 standard plant is protected against the single act in accordance with the design basis threat of radiological sabotage as required by 10 CFR 73.55(i)(4)(i). The assessment concludes that at least one alarm station maintains the ability to detect and assess alarms, initiate and coordinate an adequate response to an alarm, summon offsite assistance, and provide command and control.

Reference 3 (Reference 4) performs a site-specific analysis of Unit 3 (Unit 4) to confirm that no single act, in accordance with the design basis threat of radiological sabotage, can disable the function of both CAS and SAS as required by 10 CFR 73.55(i)(4)(i).

Procedure XXX (Reference 5) performs an inspection of the as-built physical security system using construction drawings and walkdowns to assess CAS/SAS structure location and layout, security computer location, intrusion detection equipment, alarm and assessment equipment,

security system data and power supply/backup power supply infrastructure, onsite and offsite security communications equipment, security command and control communications equipment, and component redundancy to verify that the as-built physical security system installation is consistent with the Reference 2 standard plant physical security system design assessment assumptions, as modified by the Reference 3 (Reference 4) site-specific analysis.

The inspection and analysis results are documented in References 2 through 5 and verify that CAS and SAS are designed and equipped such that, in the event of a single act, in accordance with the design basis threat of radiological sabotage, equipment needed to maintain the functional capability of either alarm station to detect and assess alarms and communicate with onsite and offsite response personnel exists.

References 2 through 5 are available for NRC inspection as part of the Unit 3 (Unit 4) ITAAC 2.6.09.05c Completion Package (Reference 6 [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. Regulatory Guide 5.69, Guidance for the Application of Radiological Sabotage Design-Basis Threat in the Design, Development and Implementation of a Physical Security Program that Meets 10 CFR 73.55 Requirements (Safeguards Information)
2. APP-SES-Z0C-001, CAS & SAS Single Act Assessment (Security Related Information)
3. DOEJ-V34-LAR-18-008-SEC001, Minimum Safe Standoff Distance (MSSD) Evaluation of the Transitional Vehicle Barrier System Between Plant Vogtle Units 3 & 4 With Respect to Equipment Required for Safe Shutdown, Equipment Required for Security Response, and Security Force Response Personnel (Safeguards Information)
4. Document XXX, Unit 4 Minimum Safe Standoff Distance (MSSD) Evaluation (Safeguards Information)
5. Procedure XXX, Unit 3 (Unit 4) CAS/SAS Security Design and Analysis Inspection (Safeguards Information)
6. 2.6.09.05c-U3-CP-Rev 0, ITAAC Completion Package
7. 2.6.09.05c-U4-CP-Rev 0, ITAAC Completion Package
8. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"