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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 2.3.09.02a [Index Number 421]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of July 11, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.3.09.02a [Index Number 421] 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 2.3.09.02a [Index Number 421]

MJY/RLB/sfr

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**Southern Nuclear Operating Company  
ND-19-0507  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.3.09.02a [Index Number 421]**

## **ITAAC Statement**

### **Design Commitment**

2.a) The hydrogen monitors identified in Table 2.3.9-1 are powered by the non-Class 1E dc and UPS system.

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

Testing will be performed by providing a simulated test signal in each power group of the non-Class 1E dc and UPS system.

### **Acceptance Criteria**

A simulated test signal exists at the hydrogen monitors identified in Table 2.3.9-1 when the non-Class 1E dc and UPS system is provided the test signal.

### **ITAAC Completion Description**

Testing is performed on the hydrogen monitors identified in the VEGP Unit 3 and Unit 4 COL Appendix C Table 2.3.9-1 (Attachment A) to demonstrate they are powered from the non-Class 1E dc and UPS system (EDS). This ITAAC performs testing on the hydrogen monitors identified in Attachment A by providing a simulated test signal in the EDS supplying power to the hydrogen monitors.

Unit 3 and Unit 4 component test package work orders SNC922137 and SNCXXXXXX (References 1 and 2, respectively) document completion of power verification activities from the EDS uninterruptible power supply (UPS) distribution panel to the hydrogen monitors identified in Attachment A. References 1 and 2 first verify that power supply cables/wiring are installed and terminated from the applicable EDS UPS power distribution panels to the hydrogen monitors identified in Attachment A using approved construction drawings and cable/wiring termination documentation. References 1 and 2 then confirm, via cable/wiring termination inspection documentation, that continuity testing is performed on each of the installed cables/wiring to confirm current flow within the installed cable/wiring. The combination of cable/wiring installation and termination verification, with the installed cable/wiring continuity testing, confirms that the hydrogen monitors identified in Appendix A are powered by their respective EDS power supply.

The Unit 3 and Unit 4 component test package work orders (References 1 and 2, respectively) confirm that a simulated test signal exists at the hydrogen monitors identified in Table 2.3.9-1 when the EDS is provided the test signal.

References 1 and 2 are available for NRC inspection as part of Unit 3 and Unit 4 ITAAC Completion Packages (References 3 and 4).

### **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. SNC922137, "VLS Component Power Verification Test – ITAAC: SV3-2.3.09.02a and 2.3.09.2b"
2. SNCXXXXXX, "VLS Component Power Verification Test – ITAAC: SV4-2.3.09.02a and 2.3.09.2b"
3. 2.3.09.02a-U3-CP-Rev 0, ITAAC Completion Package
4. 2.3.09.02a-U4-CP-Rev 0, ITAAC Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Attachment A**

COL Appendix C Table 2.3.9-1

<b>Equipment*</b>	<b>Tag No.*</b>
Containment Hydrogen Monitor	VLS-001
Containment Hydrogen Monitor	VLS-002
Containment Hydrogen Monitor	VLS-003

\* Excerpted from COL Appendix C Table 2.3.9-1