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Docket No.: 52-025

ND-18-1290
10 CFR 52.99(c)(1)U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
ITAAC Closure Notification on Completion of ITAAC 2.2.03.08c.iv.02 [Index Number 184]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.03.08c.iv.02 [Index Number 184] for verifying that the maximum elevation of the top inside surface of the Containment recirculation lines and the Containment to the In-containment Refueling Water Storage Tank (IRWST) lines is less than the elevation of the IRWST bottom inside surface. The closure process for this ITAAC is based on 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.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Tom Petrak at 706-848-1575.

Respectfully submitted,

Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 2.2.03.08c.iv.02 [Index Number 184]

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**Southern Nuclear Operating Company
ND-18-1290
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 2.2.03.08c.iv.02 [Index No. 184]**

ITAAC Statement

Design Commitment:

8.c) The PXS provides RCS makeup, boration, and safety injection during design basis events.

Inspections, Tests, Analyses:

- iv) Inspections of the elevation of the following pipe lines will be conducted:
 - 2. Containment recirculation lines; containment to IRWST lines

Acceptance Criteria:

- iv) The maximum elevation of the top inside surface of these lines is less than the elevation of:
 - 2. IRWST bottom inside surface

ITAAC Determination Basis

Multiple ITAAC are performed to demonstrate that the Passive Core Cooling System (PXS) provides Reactor Coolant System (RCS) makeup, boration, and safety injection during design basis events. This ITAAC requires that inspections be conducted to verify that the maximum elevation of the top inside surface of the Containment recirculation lines and the Containment to the In-containment Refueling Water Storage Tank (IRWST) lines is less than the elevation of the IRWST bottom inside surface.

The inspection of the elevations of the top inside surface of the Containment recirculation lines, the Containment to IRWST lines, and the IRWST bottom inside surface was performed using survey equipment in accordance with site survey and measurement procedure (Reference 1). The conservative wall thickness, derived from installed pipe data, was subtracted from the top-of-pipe survey data to obtain the highest elevation of the inside surface of these lines. The maximum derived elevation of the top inside surface of the Containment recirculation lines and the Containment to IRWST lines was compared to the elevation of the bottom inside surface of the IRWST using a common reference point.

The inspection results documented in Reference 2, verified that the maximum elevation of the top inside surface of the containment recirculation lines is 102.3 feet; the maximum elevation of the top inside surface of the containment to IRWST lines is 100.7 feet, and the elevation of the IRWST bottom inside surface is 103.0 feet, which meets the ITAAC acceptance criteria.

ITAAC Finding Review

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. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.2.03.08c.iv.02 (Reference 3) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.2.03.08c.iv.02 was performed for VEGP Unit 3 and that the prescribed acceptance criteria are met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. 4MP-T81C-N3201 Rev 5 "Construction Survey"
2. SV3-PXS-FSK-800184 Rev 0, "As-Built IRWST Injection/Recirculation Lines Top Inside Surface Elevation Comparison to IRWST Bottom Inside Surface"
3. 2.2.03.08c.iv.02-U3-CP-Rev0, ITAAC Completion Package