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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 2.2.01.09 [Index Number 110]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of August 5, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.01.09 [Index Number 110] 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 2.2.01.09 [Index Number 110] ND-18-0664 [ML18197A063], dated Jul. 13, 2018. This resubmittal supersedes ND-18-0664 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,

Kellie Roberts for MJY

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 2.2.01.09 [Index Number 110]

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Southern Nuclear Operating Company
ND-19-0968
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.01.09 [Index Number 110]

ITAAC Statement

Design Commitment

9. Safety-related displays identified in Table 2.2.1-1 can be retrieved in the MCR.

10.a) Controls exist in the MCR to cause those remotely operated valves identified in Table 2.2.1-1 to perform active functions.

10.b) The valves identified in Table 2.2.1-1 as having PMS control perform an active safety function after receiving a signal from the PMS.

Inspections/Tests/Analyses

Inspection will be performed for retrievability of the safety-related displays in the MCR.

Stroke testing will be performed on remotely operated valves identified in Table 2.2.1-1 using the controls in the MCR.

Testing will be performed on remotely operated valves listed in Table 2.2.1-1 using real or simulated signals into the PMS.

Acceptance Criteria

Safety-related displays identified in Table 2.2.1-1 can be retrieved in the MCR.

Controls in the MCR operate to cause remotely operated valves identified in Table 2.2.1-1 to perform active safety functions.

The remotely operated valves identified in Table 2.2.1-1 as having PMS control perform the active function identified in the table after receiving a signal from PMS.

ITAAC Completion Description

Inspections and testing are performed to confirm the valves listed in Combined License (COL) Appendix C Table 2.2.1-1 (Attachment A) have safety related displays retrievable in the Main Control Room (MCR), controls exist in the MCR to cause those remotely operated valves identified in Table 2.2.1-1 to perform active functions, and the valves identified as having Protection and Safety Monitoring System (PMS) control perform the active function identified in the table after receiving a signal from the PMS.

Safety-related displays identified in Table 2.2.1-1 can be retrieved in the MCR.

Inspections performed in accordance with the Unit 3 and Unit 4 component test package work orders (References 1 and 2, respectively), visually confirm that when each of the displays of the plant parameter identified in Attachment A is summoned using the MCR PMS Visual Display Units (VDUs), the expected valve position appears on the PMS VDU.

Controls in the MCR operate to cause remotely operated valves identified in Table 2.2.1-1 to perform active safety functions.

Using Plant Control System (PLS) controls in the MCR, stroke testing each valve in Attachment A is performed in accordance with component test package work orders for Unit 3 and Unit 4 (References 1 and 2, respectively). Each valve is stroked to its active function and proper valve position indication is verified locally and in the MCR. This testing demonstrates PLS controls in the MCR operate to cause the remotely operated valves identified in COL Appendix C Table 2.2.1-1 to perform their active safety functions.

The remotely operated valves identified in Table 2.2.1-1 as having PMS control perform the active function identified in the table after receiving a signal from PMS.

Testing is performed in accordance with Unit 3 and Unit 4 component test packages SNCXXXXXX and SNCYYYYYY (References 3 and 4). These component test packages utilize B-GEN-ITPCI-039 (Reference 5) to direct the performance of test procedures SV3/SV4-CAS-GJP-801 (References 6 and 7), 3/4-CCS-OTS-10-001 (References 8 and 9), 3/4-GEN-OTS-10-001 (References 10 and 11), 3/4-GEN-OTS-10-002 (References 12 and 13), 3/4-GEN-OTS-10-003 (References 14 and 15), 3/4-GEN-OTS-10-004 (References 16 and 17), and 3/4-VWS-OTS-10-001 (References 18 and 19) to confirm that the remotely operated valves identified in Attachment A as having PMS control perform the active safety function identified in the table after receiving a signal from the PMS.

References 6 through 19 establish initial conditions with each valve verified locally and in the MCR to be in the open position. An actuation signal is generated by PMS using the PMS Maintenance and Test Panel (MTP) to generate a signal to close the valves in Attachment A. Each valve is verified locally and in the MCR to be closed. Additionally, for VFS-PL-V800A/B references 10,11,14, and 15 establish initial conditions with each valve verified locally and in the MCR to be in the closed position. An actuation signal is generated by PMS using the PMS Maintenance and Test Panel (MTP) to generate a signal to open the valves. VFS-PL-V800A/B are verified locally and in the MCR to be open. This verifies that the remotely operated valves identified in Table 2.2.2-1 as having PMS control perform the active safety function identified in the table after receiving a signal from the PMS for both Unit 3 and Unit 4.

Together, these test results (References 1 through 4) provide evidence that the ITAAC Acceptance Criteria requirements are met:

- Safety-related displays identified in Table 2.2.1-1 can be retrieved in the MCR.
- Controls in the MCR operate to cause remotely operated valves identified in Table 2.2.1-1 to perform active safety functions.
- The remotely operated valves identified in Table 2.2.1-1 as having PMS control perform the active function identified in the table after receiving a signal from PMS.

References 1 through 19 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.2.01.09 Completion Packages (Reference 20 and 21, respectively).

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 finding review, which includes now-consolidated ITAAC Indexes 111 and 112, found there are no relevant ITAAC findings associated with this ITAAC.

References (available for NRC inspection)

1. SNC920991,"CNS Remotely Operated Valve Stroke Test – ITAAC:SV3- 2.2.01.09"
2. SNCXXXXXX, "CNS Remotely Operated Valve Stroke Test – ITAAC:SV4- 2.2.01.09"
3. SNCXXXXXX
4. SNCYYYYYY
5. B-GEN-ITPCI-039, "PMS CIM Component Test Procedure"
6. SV3-CAS-GJP-801, "Compressed Air System Valve Stroke Test"
7. SV4-CAS-GJP-801, "Compressed Air System Valve Stroke Test"
8. 3-CCS-OTS-10-001, "Component Cooling Water System Valve Stroke Test"
9. 4-CCS-OTS-10-001, "Component Cooling Water System Valve Stroke Test"
10. 3-GEN-OTS-10-001, "Division A Quarterly Valve Stroke Test"
11. 4-GEN-OTS-10-001, "Division A Quarterly Valve Stroke Test"
12. 3-GEN-OTS-10-002, "Division B Quarterly Valve Stroke Test"
13. 4-GEN-OTS-10-002, "Division B Quarterly Valve Stroke Test"
14. 3-GEN-OTS-10-003, "Division C Quarterly Valve Stroke Test"
15. 4-GEN-OTS-10-003, "Division C Quarterly Valve Stroke Test"
16. 3-GEN-OTS-10-004, "Division D Quarterly Valve Stroke Test"
17. 4-GEN-OTS-10-004, "Division D Quarterly Valve Stroke Test"
18. 3-VWS-OTS-10-001, "Central Chilled Water System Valve Stroke Test"
19. 4-VWS-OTS-10-001, "Central Chilled Water System Valve Stroke Test"
20. 2.2.01.09-U3-CP-Rev 0, ITAAC Completion Package
21. 2.2.01.09-U4-CP-Rev 0, ITAAC Completion Package
22. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

Containment System (CNS) Remotely Operated Valves Display, Control, and Active Function

Equipment Name*	Tag No.*	Remotely Operated Valve*	Safety-Related Display*	Control PMS/DAS *	Active Function*
Instrument Air Supply Outside Containment Isolation Valve	CAS-PL-V014	YES	Yes (Valve Position)	Yes/No	Transfer Closed
Component Cooling Water System (CCS) Containment Isolation Motor-operated Valve (MOV) – Inlet Line Outside Reactor Containment (ORC)	CCS-PL-V200	YES	Yes (Valve Position)	Yes/No	Transfer Closed
CCS containment isolation MOV-outlet line IRC	CCS-PL-V207	YES	Yes (Valve Position)	Yes/No	Transfer Closed
CCS containment isolation MOV-outlet line ORC	CCS-PL-V208	YES	Yes (Valve Position)	Yes/No	Transfer Closed
SFS Discharge Line containment isolation MOV - ORC	SFS-PL-V038	YES	Yes (Valve Position)	Yes/No	Transfer Closed
SFS Suction Line containment isolation MOV - IRC	SFS-PL-V034	YES	Yes (Valve Position)	Yes/No	Transfer Closed
SFS Suction Line containment isolation MOV - ORC	SFS-PL-V035	YES	Yes (Valve Position)	Yes/No	Transfer Closed
Containment Purge Inlet containment isolation valve -ORC	VFS-PL-V003	YES	Yes (Valve Position)	Yes/Yes	Transfer Closed
Containment Purge Inlet containment isolation valve - IRC	VFS-PL-V004	YES	Yes (Valve Position)	Yes/Yes	Transfer Closed
Containment Purge Discharge containment isolation valve - IRC	VFS-PL-V009	YES	Yes (Valve Position)	Yes/Yes	Transfer Closed
Containment Purge Discharge containment isolation valve -ORC	VFS-PL-V010	YES	Yes (Valve Position)	Yes/Yes	Transfer Closed
Vacuum Relief containment isolation A MOV - ORC	VFS-PL-V800A	YES	Yes (Valve Position)	Yes/No	Transfer Closed/ Transfer Open
Vacuum Relief containment isolation B MOV - ORC	VFS-PL-V800B	YES	Yes (Valve Position)	Yes/No	Transfer Closed/ Transfer Open
Fan Cooler Return containment isolation valve - IRC	VWS-PL-V082	YES	Yes (Valve Position)	Yes/No	Transfer Closed
Fan Cooler Return containment isolation valve - ORC	VWS-PL-V086	YES	Yes (Valve Position)	Yes/No	Transfer Closed
Fan Cooler Supply containment isolation valve - ORC	VWS-PL-V058	YES	Yes (Valve Position)	Yes/No	Transfer Closed
Reactor Coolant Drain Tank (RCDT) Gas Outlet containment isolation valve - IRC	WLS-PL-V067	YES	Yes (Valve Position)	Yes/No	Transfer Closed
RCDT Gas Outlet containment isolation valve - ORC	WLS-PL-V068	YES	Yes (Valve Position)	Yes/No	Transfer Closed

Equipment Name*	Tag No.*	Remotely Operated Valve*	Safety-Related Display*	Control PMS/DAS*	Active Function*
Sump Discharge containment isolation valve - IRC	WLS-PL-V055	YES	Yes (Valve Position)	Yes/Yes	Transfer Closed
Sump Discharge containment isolation valve - ORC	WLS-PL-V057	YES	Yes (Valve Position)	Yes/Yes	Transfer Closed

*Excerpt from COL Appendix C Table 2.2.1-1