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52-026ND-19-0945
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 2.2.01.06b [Index Number 103]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of July 31, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.01.06b [Index Number 103] 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 & 4Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.01.06b [Index Number 103]

MJY/RLB/sfr

U.S. Nuclear Regulatory Commission

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**Southern Nuclear Operating Company
ND-19-0945
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.01.06b [Index Number 103]**

ITAAC Statement

Design Commitment

6.b) The Class 1E components identified in Table 2.2.1-1 are powered from their respective Class 1E division.

Inspections/Tests/Analyses

Testing will be performed by providing a simulated test signal in each Class 1E division.

Acceptance Criteria

A simulated test signal exists at the Class 1E equipment identified in Table 2.2.1-1 when the assigned Class 1E division is provided the test signal.

ITAAC Completion Description

Testing is performed on the Class 1E components (equipment) identified in the VEGP Unit 3 and Unit 4 COL Appendix C Table 2.2.1-1 (Attachment A) to demonstrate they are powered from their respective Class 1E division. This ITAAC performs testing on the Containment System (CNS) equipment identified in Table 2.2.1-1 by providing a simulated test signal in each Class 1E division. The Class 1E electrical penetrations identified in Attachment A are also tested by this ITAAC.

The electrical penetrations identified in Attachment A provide electrical continuity from Class 1E power supplies Outside Reactor Containment (ORC) to Class 1E equipment Inside Reactor Containment (IRC), and are not themselves powered components. Multiple Class 1E component and equipment ITAAC perform Class 1E power verifications that include power verifications through the electrical penetrations identified in Attachment A. Thus, for the purposes of this ITAAC's design commitment scope, Unit 3 and Unit 4 component test package work orders SNC920985 and SNCXXXXXX (References 1 and 2, respectively) document completion of Class 1E power verification testing on the containment Electrical Penetration Assembly (EPA) electrical conductors from the ORC EPA field cable conductor termination point to the IRC EPA field cable conductor termination point for the Class 1E power electrical penetrations identified in Attachment A. References 1 and 2 first verify that the Class 1E power EPA feedthrough conductors are installed in the containment electrical penetrations identified in Attachment A using approved construction drawings and EPA installation documentation. References 1 and 2 then confirm, via EPA inspection documentation, that continuity testing is performed on each of the installed Class 1E power EPA feedthrough conductors to confirm current flow within the installed conductor. The combination of Class 1E power EPA feedthrough conductor installation verification, with the installed EPA feedthrough conductor continuity testing confirms that the EPA electrical conductors from the ORC EPA field cable conductor termination point to the IRC EPA field cable conductor termination point for the Class 1E electrical penetrations identified in Attachment A are powered from their respective Class 1E division.

For the remaining equipment identified in Attachment A, Unit 3 and Unit 4 component test package work orders SNC920985 and SNCXXXXXX (References 1 and 2, respectively) document completion of power verification activities from the PMS cabinets and the Class 1E power distribution panels/motor control centers to the equipment identified in Attachment A. Class 1E power verification testing of the Protection and Safety Monitoring System (PMS)

cabinets, associated with the equipment identified in Attachment A, is verified through ITAAC 2.5.02.05a component testing (Reference 3) and confirms the PMS cabinets are powered from their respective Class 1E division. References 1 and 2 first verify that power supply cables/wiring are installed and terminated from the applicable PMS cabinet and Class 1E power distribution panel/motor control center to the respective component 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 equipment identified in Appendix A is powered from its respective Class 1E division.

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 Class 1E equipment identified in Table 2.2.1-1 when the assigned Class 1E division 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 4 and 5).

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. SNC920985, "CNS Component Power Verification Test – ITAAC: SV3-2.2.01.06b"
2. SNCXXXXXX, "CNS Component Power Verification Test – ITAAC: SV4-2.2.01.06b"
3. ITAAC 2.5.02.05a Closure Notification
4. 2.2.01.06b-U3-CP-Rev0, ITAAC Completion Package
5. 2.2.01.06b-U4-CP-Rev0, ITAAC Completion Package
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

COL Appendix C Table 2.2.1-1

Equipment Name*	Tag No.*
Instrument Air Supply Outside Containment Isolation Valve	CAS-PL-V014
Component Cooling Water System (CCS) Containment Isolation Motor-operated Valve (MOV) – Inlet Line Outside Reactor Containment (ORC)	CCS-PL-V200
CCS Containment Isolation MOV – Outlet Line IRC	CCS-PL-V207
CCS Containment Isolation MOV – Outlet Line ORC	CCS-PL-V208
SFS Discharge Line Containment Isolation MOV – ORC	SFS-PL-V038
SFS Suction Line Containment Isolation MOV – IRC	SFS-PL-V034
SFS Suction Line Containment Isolation MOV – ORC	SFS-PL-V035
Containment Purge Inlet Containment Isolation Valve – ORC	VFS-PL-V003
Containment Purge Inlet Containment Isolation Valve – IRC	VFS-PL-V004
Containment Purge Discharge Containment Isolation Valve – IRC	VFS-PL-V009
Containment Purge Discharge Containment Isolation Valve – ORC	VFS-PL-V010
Vacuum Relief Containment Isolation A MOV – ORC	VFS-PL-V800A
Vacuum Relief Containment Isolation B MOV – ORC	VFS-PL-V800B
Fan Coolers Return Containment Isolation Valve – IRC	VWS-PL-V082
Fan Coolers Return Containment Isolation Valve – ORC	VWS-PL-V086
Fan Coolers Supply Containment Isolation Valve – ORC	VWS-PL-V058
Reactor Coolant Drain Tank (RCDT) Gas Outlet Containment Isolation Valve – IRC	WLS-PL-V067
RCDT Gas Outlet Containment Isolation Valve – ORC	WLS-PL-V068
Sump Discharge Containment Isolation Valve – IRC	WLS-PL-V055
Sump Discharge Containment Isolation Valve – ORC	WLS-PL-V057

Electrical Penetration P11	IDSA-EY-P11Z
Electrical Penetration P12	IDSA-EY-P12Y
Electrical Penetration P13	IDSA-EY-P13Y
Electrical Penetration P14	IDSD-EY-P14Z
Electrical Penetration P15	IDSD-EY-P15Y
Electrical Penetration P16	IDSD-EY-P16Y
Electrical Penetration P27	IDSC-EY-P27Z
Electrical Penetration P28	IDSC-EY-P28Y
Electrical Penetration P29	IDSC-EY-P29Y
Electrical Penetration P30	IDSB-EY-P30Z
Electrical Penetration P31	IDSB-EY-P31Y
Electrical Penetration P32	IDSB-EY-P32Y

* Excerpted from COL Appendix C Table 2.2.1-1