Southern Nuclear

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SEP 1 3 2019

Docket Nos.: 52-025
52-026

ND-19-1100
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission
Document Control Desk
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 2.3.29.04 [Index Number 491]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of September 16, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.3.29.04 [Index Number 491] 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 2.3.29.04 [Index Number 491]

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File AR.01.02.06

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Southern Nuclear Operating Company
ND-19-1100
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.3.29.04 [Index Number 491]

ITAAC Statement

Design Commitment

4. The WWS stops the discharge from the turbine building sumps upon detection of high radiation in the discharge stream to the oil separator.

Inspections/Tests/Analyses

Tests will be performed to confirm that a simulated high radiation signal from the turbine building sump discharge radiation monitor, WWS-021 causes the sump pumps (WWS-MP-01A and B, and WWS-MP-07A and B) to stop operating, stopping the spread of radiation outside of the turbine building.

Acceptance Criteria

A simulated high radiation signal causes the turbine building sump pumps (WWS-MP-01A and B, and WWS-MP-07A and B) to stop operating, stopping the spread of radiation outside of the turbine building.

ITAAC Completion Description

This ITAAC is performed to verify, by testing, that a simulated high radiation signal from the turbine building sump discharge radiation monitor, WWS-021 causes the sump pumps (WWS-MP-01A and B, and WWS-MP-07A and B) to stop operating, stopping the spread of radiation outside of the turbine building.

The turbine building sump pumps are pneumatic, double diaphragm pumps that are controlled (stop / start) by individual air solenoid valves. The waste water system (WWS) has two turbine building sumps with two pumps per sump (sump A – WWS-MP-01A and WWS-MP-07A / sump B – WWS-MP-01B and WWS-MP-07B). References 1 and 2 establish initial conditions by manually isolating air to the turbine building sump pumps. A high level sump signal to all the turbine building sump pumps is input causing the air solenoid valves to open. The open solenoid valves result in a RUNNING indication in the Main Control Room (MCR) for each of the sump pumps. A simulated high radiation signal from the turbine building sump discharge radiation monitor (WWS-021) is input causing the air solenoid valves to close. The closing of the air solenoid valves causes a STOPPED indication to be displayed in the MCR for each of the pumps confirming the high radiation signal caused the sump pumps to stop.

The completed test results (Reference 1 and 2) confirm a simulated high radiation signal causes the turbine building sump pumps (WWS-MP-01A and B, and WWS-MP-07A and B) to stop operating, stopping the spread of radiation outside of the turbine building.

References 1 and 2 are available for NRC inspection as part of ITAAC 2.3.29.04 Unit 3 and 4 Completion Packages (Reference 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. SNCXXXXXX
2. SNCYYYYYY
3. 2.3.29.04-U3-CP-Rev 0, "ITAAC Completion Package
4. 2.3.29.04-U4-CP-Rev 0, "ITAAC Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52