Southern Nuclear

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U.S. Nuclear Regulatory Commission
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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 2.6.09.15a [Index Number 655]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of September 17, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.6.09.15a [Index Number 655] 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 & Unit 4
Completion Plan for Uncompleted ITAAC 2.6.09.15a [Index Number 655]

MJY/RLB/sfr

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Southern Nuclear Operating Company
ND-19-1035
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 & Unit 4
Completion Plan for Uncompleted ITAAC 2.6.09.15a [Index Number 655]

ITAAC Statement

Design Commitment

15.a) Security alarm devices, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when on standby power). Alarm annunciation shall indicate the type of alarm (e.g., intrusion alarms and emergency exit alarm) and location.

16. Equipment exists to record onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time.

Inspections/Tests/Analyses

A test will be performed to verify that security alarms, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when on standby power) and that alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location.

Test, analysis, or a combination of test and analysis will be performed to ensure that equipment is capable of recording each onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time.

Acceptance Criteria

A report exists and concludes that security alarm devices, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power) and that alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location.

A report exists and concludes that equipment is capable of recording each onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time.

ITAAC Completion Description

Testing of the security computer system is performed to verify that security alarm devices, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power) and that Central Alarm Station (CAS) and Secondary Alarm Station (SAS) alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location, and that the security computer system security alarm recording equipment is capable of recording each onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time. The VEGP Unit 3 (Unit 4) Plant Security System ITAAC only cover the Unit 3 (Unit 4) plant security system design commitment scope. The CAS and SAS are common to both VEGP Unit 3 and Unit 4.

A report exists and concludes that security alarm devices, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power) and that alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location.

Testing of the security computer system is performed to verify that Unit 3 (Unit 4) security alarm devices, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power) and that CAS and SAS alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location, and satisfies the applicable security alarm device and alarm annunciation requirements of the VEGP Units 3 and 4 Physical Security Plan associated with 10 CFR 73.55(i)(3).

Procedure XXX (Reference 1) tests the Unit 3 (Unit 4) security alarm devices identified in the Vogtle Plant Security System Database (Reference 2), including the associated security alarm device transmission lines, to confirm the security alarm devices are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power), and that CAS and SAS alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location. Specifically, Procedure XXX:

> Tests each of the tamper indication security devices identified in Reference 2 by initiating a tamper signal at the tamper indication device and confirming that the resulting CAS and SAS alarm annunciation indicates the type of alarm (tamper) and its location.
>
> Tests the self-checking function of the security alarm system by failing the security alarm system signal connectivity to the security alarm annunciators in each of the security alarm system transmission lines, causing a failure signal for each security alarm device identified in Reference 2, and by supplying power to the security alarm system from a standby source of power, and confirming that a self-checking automatic indication is provided in CAS and SAS when failure of the security alarm system or component occurs, or when the security alarm system is supplied power from a standby power source.
>
> Tests each of the security alarm devices identified in Reference 2 by initiating a security device alarm signal and confirming that the resulting CAS and SAS alarm annunciation indicates the type of alarm and its location.

The test results are summarized as a report in Reference 3 and conclude that Unit 3 (Unit 4) security alarm devices, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power) and that alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location.

A report exists and concludes that equipment is capable of recording each onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time.

Testing of the security computer system is performed to verify that the security computer system security alarm recording equipment is capable of recording each Unit 3 (Unit 4) onsite security

alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time, and satisfy the applicable onsite alarm annunciation recording requirements of the VEGP Units 3 and 4 Physical Security Plan associated with 10 CFR 73.70(f).

Procedure YYY (Reference 4) tests the Unit 3 (Unit 4) security computer system security alarm recording equipment by initiating an alarm signal for each of the security alarm devices identified in the Reference 2 and confirming that, for each alarm signal, the security computer system records the security alarm annunciation including location of the alarm, type of alarm (including tamper indication alarms), alarm circuit, date, and time. Procedure YYY also confirms that a false alarm cause code (e.g., nuisance) or alarm check code (e.g., operational test) can be recorded in the alarm summary or event summary record.

The test results are summarized as a report in Reference 5 and conclude that Unit 3 (Unit 4) security computer system security alarm recording equipment is capable of recording each Unit 3 (Unit 4) onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time.

References 1 through 5 are available for NRC inspection as part of the Unit 3 (Unit 4) ITAAC 2.6.09.15a Completion Package (Reference 6 [7]).

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. Procedure XXX, Unit 3 (Unit 4) Security Computer System Security Alarm Device Test
2. SV0-SES-J0X-800000, Vogtle Plant Security System Database (SRI)
3. Security Computer System Security Alarm Device Test Summary Report
4. Procedure YYY, Unit 3 (Unit 4) Security Computer System Security Alarm Recording Equipment Test
5. Security Computer System Security Alarm Recording Equipment Test Summary Report
6. 2.6.09.15a-U3-CP-Rev0, ITAAC Completion Package
7. 2.6.09.15a-U4-CP-Rev0, ITAAC Completion Package
8. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"