Southern Nuclear

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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 2.5.02.08b.ii [Index Number 543]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of September 18, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.5.02.08b.ii [Index Number 543] 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 2.5.02.08b.ii [Index Number 543]

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Southern Nuclear Operating Company
ND-19-1122
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.5.02.08b.ii [Index Number 543]

ITAAC Statement

Design Commitment

8.b) The PMS provides for the transfer of control capability from the MCR to the RSW using multiple transfer switches. Each individual transfer switch is associated with only a single safety-related group or with nonsafety-related control capability.

Inspections/Tests/Analyses

ii) An operational test of the as-built system will be performed to demonstrate the transfer of control capability from the MCR to the RSW.

Acceptance Criteria

ii) Actuation of each transfer switch results in an alarm in the MCR and RSW, the activation of operator control capability from the RSW, and the deactivation of operator control capability from the MCR for the associated safety-related division and nonsafety-related control capability.

ITAAC Completion Description

Multiple ITAAC are performed to ensure that the Protection and Safety Monitoring System (PMS) provides for the transfer of control capability from the Main Control Room (MCR) to the Remote Shutdown Workstation (RSW) using multiple transfer switches. Each individual transfer switch is associated with only a single safety-related group or with non-safety-related control capability. The subject ITAAC requires that an operational test of the as-built system will be performed to demonstrate the transfer of control capability from the MCR to the RSW.

This ITAAC is performed to verify, by testing, that activation of each PMS transfer switch from the MCR to the RSW results in an alarm in the MCR and RSW. This ITAAC also verifies the activation of the operator control capability from the RSW and the deactivation of the operator control capability from the MCR for the associated safety-related division and nonsafety-related control capability.

ITAAC 2.5.02.08b.ii is completed as a combination of:

- Factory Acceptance Test
- Testing of switches in the MCR, RSW, and MCR/RSW Transfer Panel to verify proper wiring and correct digital output is received
- Site software installation and regression test – Hardware and software integration verification and testing of post system delivery changes

The Factory Acceptance Testing (FAT) follows the guidance of NEI 08-01 Section 9.4 for the as-built tests to be performed at other than the final installed location. The FAT was performed in accordance with PMS Software Program Manual WCAP-16096 (Reference 1), PMS Test Plan APP-PMS-T5-001 (Reference 2) and applicable Codes and Standards described in Vogtle 3 and 4 Update Final Safety Analysis Report (UFSAR) Section 7.4. Test results are documented

in AP1000 Protection and Safety Monitoring System Qualified Data Processing System Channel Integration Test Reports (References 5 and 6 and 13 through 18).

The FAT included testing of PMS inputs and outputs, logic, and functionality. During this test, the initial conditions for the test scenarios are established and process parameters are simulated to get the expected outputs.

The test initially confirms that an alarm actuates in the MCR and RSW when process parameters are simulated for each transfer switch placed in the Remote Shutdown Room (RSR) ENABLE position. The test procedure used for this testing is PMS Miscellaneous Test Procedure SV3/4-PMS-T1P-034 (References 3 and 4). The results of the testing are documented in the FAT Test Report SV3/4-PMS-T2R-034 (References 5 and 6). Attachment A provides a listing of the test cases to confirm the alarm actuation.

The test continues with all transfer switches simulated in the RSR ENABLED position. During this portion of the test, the process parameters are simulated to confirm the operator control capability is transferred from the MCR to the RSW and all MCR operator control capability is deactivated. The multiple test procedures that are used for this testing are PMS Channel Integration Test Procedures SV3/4-PMS-T1P-007 (References 7 and 8), SV3/4-PMS-T1P-008 (References 9 and 10), and SV3/4-PMS-T1P-018 (References 11 and 12). The results of the testing are documented in the FAT Test Reports SV3/4-PMS-T2R-007 (References 13 and 14), SV3/4-PMS-T2R-008 (References 15 and 16), and SV3/4-PMS-T2R-018 (References 17 and 18). Attachment B provides a listing of the test cases to confirm the activation of RSW controls and the deactivation of MCR controls.

Site testing of each switch is performed to verify the switch is properly wired and the correct digital output is received. This test places each switch in the MCR, RSW, and MCR/RSW Transfer Panel in all switch positions and verifies proper indicating lights are received in computer cabinets. Unit 3 component test package work orders 1051893, 1054772, 1058836, and 1060105 (References 19, 20, 21, and 22) and Unit 4 component test package work orders SNCWWWWWW, SNCXXXXXX, SNCYYYYYY, and SNCZZZZZZ (References 23, 24, 25, and 26) document completion of switch position testing portion of this ITAAC. Attachment C provides a listing switches that are tested in each test package work order.

Additional hardware and software installation and associated inspections and testing are performed on-site to verify that the cabinets are intact and functional in accordance with Units 3 and 4 for applicable Field Change Notifications (FCNs) AP1000 Vogtle Unit 3 PMS Initial Software Installation - Software Release 8.7.0.1 and AP1000 Vogtle Unit 4 PMS Initial Software Installation - Software Release 8.7.0.1 (References 27 and 28). Reference 27 and 28 also include steps that confirm and document successful software load and further confirm the physical properties of the as-built PMS. The Field Change Notification are implemented using Unit 3 component test package work order SNCAAAAAA and Unit 4 component test package work order SNCBBBBBB (References 29 and 30). A regression analysis (i.e., change evaluation) is performed post-delivery and installation for hardware changes (references 31 and 32) and software changes (Reference 33) to determine if additional testing is needed for the as-built system.

The completed Unit 3 and Unit 4 FAT (References 5, 6, and 13 through 18), switch testing (References 19 through 26), FCNs (References 27 and 30), and regression test results (References 31 through 33) confirm actuation of each transfer switch results in an alarm in the

MCR and RSW, the activation of operator control capability from the RSW, and the deactivation of operator control capability from the MCR for the associated safety-related division and nonsafety-related control capability.

References 1 through 33 are available for NRC inspection as part of the ITAAC 2.5.02.08b.ii Unit 3 and 4 Completion Packages (References 34 and 35).

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. WCAP-16096 "Software Program Manual for Common Q Systems"
2. APP-PMS-T5-001 "AP1000 Protection and Safety Monitoring System Test Plan"
3. SV3-PMS-T1P-034, "AP1000 Protection and Safety Monitoring System Maintenance and Test Panel Miscellaneous Test Procedure"
4. SV4-PMS-T1P-034, "AP1000 Protection and Safety Monitoring System Maintenance and Test Panel Miscellaneous Test Procedure"
5. SV3-PMS-T2R-034, "AP1000 Protection and Safety Monitoring System Maintenance and Test Panel Miscellaneous Test Report"
6. SV4-PMS-T2R-034, "AP1000 Protection and Safety Monitoring System Maintenance and Test Panel Miscellaneous Test Report"
7. SV3-PMS-T1P-007, "AP1000 Protection and Safety Monitoring System Reactor Trip Channel Integration Test Procedure"
8. SV4-PMS-T1P-007, "AP1000 Protection and Safety Monitoring System Reactor Trip Channel Integration Test Procedure"
9. SV3-PMS-T1P-008 "AP1000 Protection and Safety Monitoring System System-Level Engineered Safety Features Channel Integration Test Procedure"
10. SV4-PMS-T1P-008 "AP1000 Protection and Safety Monitoring System System-Level Engineered Safety Features Channel Integration Test Procedure"
11. SV3-PMS-T1P-018 "AP1000 Protection and Safety Monitoring I/O Channel Accuracy Channel Integration Test Procedure"
12. "SV4-PMS-T1P-018 "AP1000 Protection and Safety Monitoring I/O Channel Accuracy Channel Integration Test Procedure"
13. SV3-PMS-T2R-007, "AP1000 Protection and Safety Monitoring System Reactor Trip Channel Integration Test Report"
14. SV4-PMS-T2R-007, "AP1000 Protection and Safety Monitoring System Reactor Trip Channel Integration Test Report"
15. SV3-PMS-T2R-008 "AP1000 Protection and Safety Monitoring System System-Level Engineered Safety Features Channel Integration Test Report"
16. SV4-PMS-T2R-008 "AP1000 Protection and Safety Monitoring System System-Level Engineered Safety Features Channel Integration Test Report"
17. SV3-PMS-T2R-018 "AP1000 Protection and Safety Monitoring I/O Channel Accuracy Channel Integration Test Report"
18. SV4-PMS-T2R-018 "AP1000 Protection and Safety Monitoring I/O Channel Accuracy Channel Integration Test Report"

19. 1051893, "Perform Component I/O Testing on Listed PMS Components"
20. 1054772, "Perform B-GEN-ITPCI-006 for the Main Control Room & Remote Shutdown Room"
21. 1058836, "MCR/RSR Transfer Panel"
22. 1060105, "Perform component test B-GEN-ITPCI-006 for DDS"
23. SNCWWWWWW
24. SNCXXXXXX
25. SNCYYYYYY
26. SNCZZZZZZ
27. Unit 3 Field Change Notice "AP1000 Vogtle Unit 3 PMS Initial Software Installation - Software Release 8.7.0.1"
28. Unit 4 Field Change Notice "AP1000 Vogtle Unit 4 PMS Initial Software Installation - Software Release 8.7.0.1"
29. SNCAAAAAA
30. SNCBBBBBB
31. GIC-AP1000-HEDS-19-001, Rev. 0 "Regression Testing Analysis for Vogtle Unit 3 Protection and Safety Monitoring System (PMS) Baseline 8.2 to 8.4 Hardware Modifications Performed at Site" (Unit 3)
32. GIC-AP1000-HEDS-19-001, Rev. 0 "Regression Testing Analysis for Vogtle Unit 4 Protection and Safety Monitoring System (PMS) Baseline 8.2 to 8.4 Hardware Modifications Performed at Site" (Unit 4)
33. APP-PMS-T2R-050, "AP1000 Protection and Safety Monitoring System Channel Integration Test Integrated System Validation Test Report"
34. ITAAC 2.5.02.08b.ii-U3-CP-Rev0, "ITAAC Completion Package"
35. ITAAC 2.5.02.08b.ii-U4-CP-Rev0, "ITAAC Completion Package"
36. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

Factory Acceptance Test - Test Cases

MCR/RSR Transfer Panel (OCS-JW-001) Switches Alarm Generation & Transmission (PMS-T2R-034)

Switch Description	Switch Tag	PMS-T2R-034 Test Cases
PLS I	PLS-HS402A	TPS34-03.5 Divisions A, B, C, D
PLS II	PLS-HS402B	
MCR/RSR Xfr Panel PMS Div A	PMS-HS401	
MCR/RSR Xfr Panel PMS Div B	PMS-HS402	
MCR/RSR Xfr Panel PMS Div C	PMS-HS403	
MCR/RSR Xfr Panel PMS Div D	PMS-HS404	

Attachment B

Factory Acceptance Test - Test Cases

RSW Activation / MCR Deactivation Test (PMS-T2R-007)

Switch Description	MCR Switch Tag	RSW Switch Tag	PMS-T2R-007 Test Case
Safeguards Actuation	PMS-HS033	DDS-HS318	TPS01A-19.1 TPS01B-19.1 TPS01C-19.1 TPS01D-19.1
Safeguards Actuation	PMS-HS034		TPS01A-19.1 TPS01B-19.1 TPS01C-19.1 TPS01D-19.1

RSW Activation / MCR Deactivation Test (PMS-T2R-008)

Switch Description	MCR Switch Tag	RSW Switch Tag	PMS-T2R-008 Test Cases
ADS Stages 1-3 Actuation	PMS-HS001 PMS-HS101	DDS-HS301	TPS02A-05.1 TPS02B-05.1 TPS02C-05.1 TPS02D-05.1
ADS Stages 1-3 Actuation	PMS-HS002 PMS-HS102	DDS-HS302	TPS02A-05.1 TPS02B-05.1 TPS02C-05.1 TPS02D-05.1
ADS Stage 4 Actuation	PMS-HS003 PMS-HS103	DDS-HS303	TPS02A-05.4 TPS02B-05.4 TPS02C-05.4 TPS02D-05.4
ADS Stage 4 Actuation	PMS-HS004 PMS-HS104	DDS-HS304	TPS02A-05.4 TPS02B-05.4 TPS02C-05.4 TPS02D-05.4

RSW Activation / MCR Deactivation Test (PMS-T2R-008) (con't)

Switch Description	MCR Switch Tag	RSW Switch Tag	PMS-T2R-008 Test Cases
Containment Recirculation	PMS-HS005 PMS-HS105	DDS-HS305	TPS02A-10.1 TPS02B-10.1 TPS02C-10.1 TPS02D-10.1
Containment Recirculation	PMS-HS006 PMS-HS106	DDS-HS306	TPS02A-10.1 TPS02B-10.1 TPS02C-10.1 TPS02D-10.1
IRWST Injection	PMS-HS007 PMS-HS107	DDS-HS307	TPS02A-03 TPS02B-03 TPS02C-03 TPS02D-03
IRWST Injection	PMS-HS008 PMS-HS108	DDS-HS308	TPS02A-03 TPS02B-03 TPS02C-03 TPS02D-03
RNS Isolation	PMS-HS013 PMS-HS113	DDS-HS313	TPS02A-21.1 TPS02B-21.1 TPS02D-21.1
RNS Isolation	PMS-HS014 PMS-HS114	DDS-HS314	TPS02A-21.1 TPS02B-21.1 TPS02D-21.1
CMT Actuation	PMS-HS015	DDS-HS315	TPS02A-04.1 TPS02B-04.1 TPS02C-04.1 TPS02D-04.1
CMT Actuation	PMS-HS016		TPS02A-04.1 TPS02B-04.1 TPS02C-04.1 TPS02D-04.1
Containment Cooling	PMS-HS017	DDS-HS317	TPS02A-13 TPS02B-13 TPS02C-13
Containment Cooling	PMS-HS018		TPS02A-13 TPS02B-13 TPS02C-13
Main Steamline Isolation	PMS-HS021	DDS-HS321	TPS02B-11.1 TPS02D-11.1
Main Steamline Isolation	PMS-HS022		TPS02B-11.1 TPS02D-11.1
SG Relief Isolation	PMS-HS041	DDS-HS322	TPS02B-25.1 TPS02D-25.1
SG Relief Isolation	PMS-HS042		TPS02B-25.1 TPS02D-25.1

RSW Activation / MCR Deactivation Test (PMS-T2R-008) (con't)

Switch Description	MCR Switch Tag	RSW Switch Tag	PMS-T2R-008 Test Cases
PRHR Actuation	PMS-HS023	DDS-HS323	TPS02A-08.1 TPS02B-08.1 TPS02D-08.1
PRHR Actuation	PMS-HS024		TPS02A-08.1 TPS02B-08.1 TPS02D-08.1
Containment Isolation	PMS-HS027	DDS-HS327	TPS02A-02 TPS02B-02 TPS02C-02 TPS02D-02
Containment Isolation	PMS-HS028		TPS02A-02 TPS02B-02 TPS02C-02 TPS02D-02
Makeup Isolation	PMS-HS029	DDS-HS329	TPS02A-16.2 TPS02D-16.2
Makeup Isolation	PMS-HS030		TPS02A-16.2 TPS02D-16.2
Feedwater Isolation	PMS-HS031	DDS-HS331	TPS02B-07.1 TPS02D-07.1
Feedwater Isolation	PMS-HS032		TPS02B-07.1 TPS02D-07.1
Steam Dump Mode Control	PMS-HS035	DDS-HS335	TPS02B-17.1 TPS02D-17.1
Steam Dump Mode Control	PMS-HS036		TPS02B-17.1 TPS02D-17.1
Steam Dump Stage 1 Cooldown	PMS-HS037	DDS-HS337	TPS02B-17.2 TPS02D-17.21
Steam Dump Stage 1 Cooldown	PMS-HS038		TPS02B-17.2 TPS02D-17.2
Steam Dump Stage 2 Cooldown	PMS-HS039	DDS-HS339	TPS02B-17.3 TPS02D-17.3
Steam Dump Stage 2 Cooldown	PMS-HS040		TPS02B-17.3 TPS02D-17.3
Containment Vacuum Relief	PMS-HS044	DDS-HS344	TPS02A-27 TPS02C-27
Containment Vacuum Relief	PMS-HS045		TPS02A-27 TPS02C-27

RSW Activation / MCR Deactivation Test (PMS-T2R-018)

Switch Description	MCR Switch Tag	RSW Switch Tag	PMS-T2R-018 Test Cases
Reactor Head Vent V150A	PMS-HS009 PMS-HS109	DDS-HS309 DDS-HS340	TPS05A-01.006
Reactor Head Vent V150B	PMS-HS010 PMS-HS110	DDS-HS310 DDS-HS341	TPS05B-01.010
Reactor Head Vent V150C	PMS-HS011 PMS-HS111	DDS-HS311 DDS-HS342	TPS05C-01.010
Reactor Head Vent V150D	PMS-HS012 PMS-HS112	DDS-HS312 DDS-HS343	TPS05D-01.006

Attachment C

Test Package Work Orders

Work Order 1051893 (U3) / SNCWWWWWW (U4)

Switch Description	MCR Switch Tag
ADS Stages 1-3 Actuation	PMS-HS001
ADS Stages 1-3 Actuation	PMS-HS002
ADS Stage 4 Actuation	PMS-HS003
ADS Stage 4 Actuation	PMS-HS004
Containment Recirculation	PMS-HS005
Containment Recirculation	PMS-HS006
IRWST Injection	PMS-HS007
IRWST Injection	PMS-HS008
Reactor Head Vent V150A	PMS-HS009
Reactor Head Vent V150B	PMS-HS010
Reactor Head Vent V150C	PMS-HS011
Reactor Head Vent V150D	PMS-HS012
RNS Isolation	PMS-HS013
RNS Isolation	PMS-HS014
CMT Actuation	PMS-HS015
CMT Actuation	PMS-HS016
Containment Cooling	PMS-HS017
Containment Cooling	PMS-HS018
Main Steamline Isolation	PMS-HS021
Main Steamline Isolation	PMS-HS022
PRHR Actuation	PMS-HS023
PRHR Actuation	PMS-HS024
Containment Isolation	PMS-HS027
Containment Isolation	PMS-HS028
Makeup Isolation	PMS-HS029
Makeup Isolation	PMS-HS030
Feedwater Isolation	PMS-HS031
Feedwater Isolation	PMS-HS032
Safeguards Actuation	PMS-HS033
Safeguards Actuation	PMS-HS034

Work Order 1051893 (U3) / SNCWWWWWW (U4) (con't)

Switch Description	MCR Switch Tag
Steam Dump Mode Control	PMS-HS035
Steam Dump Mode Control	PMS-HS036
Steam Dump Stage 1 Cooldown	PMS-HS037
Steam Dump Stage 1 Cooldown	PMS-HS038
Steam Dump Stage 2 Cooldown	PMS-HS039
Steam Dump Stage 2 Cooldown	PMS-HS040
SG Relief Isolation	PMS-HS041
SG Relief Isolation	PMS-HS042
Containment Vacuum Relief	PMS-HS044
Containment Vacuum Relief	PMS-HS045
ADS Stages 1-3 Actuation	PMS-HS101
ADS Stages 1-3 Actuation	PMS-HS102
ADS Stage 4 Actuation	PMS-HS103
ADS Stage 4 Actuation	PMS-HS104
Containment Recirculation	PMS-HS105
Containment Recirculation	PMS-HS106
IRWST Injection	PMS-HS107
IRWST Injection	PMS-HS108
Reactor Head Vent V150A	PMS-HS109
Reactor Head Vent V150B	PMS-HS110
Reactor Head Vent V150C	PMS-HS111
Reactor Head Vent V150D	PMS-HS112
RNS Isolation	PMS-HS113
RNS Isolation	PMS-HS114

Work Order 1054772 (U3) / SNCXXXXXX (U4)

Switch Description	Switch Tag
PLS I	PLS-HS402A
PLS II	PLS-HS402B

Work Order 1058836 (U3) / SNCYYYYYY (U4)

Switch Description	Switch Tag
MCR/RSR Xfr Panel PMS Div A	PMS-HS401
MCR/RSR Xfr Panel PMS Div B	PMS-HS402
MCR/RSR Xfr Panel PMS Div C	PMS-HS403
MCR/RSR Xfr Panel PMS Div D	PMS-HS404

Work Order 1060105 (U3) / SNCZZZZZZ (U4)

Switch Description	RSW Switch Tag
ADS Stages 1-3 Actuation	DDS-HS301
ADS Stages 1-3 Actuation	DDS-HS302
ADS Stage 4 Actuation	DDS-HS303
ADS Stage 4 Actuation	DDS-HS304
Containment Recirculation	DDS-HS305
Containment Recirculation	DDS-HS306

Work Order 1060105 (U3) / SNCZZZZZZ (U4) (con't)

Switch Description	RSW Switch Tag
IRWST Injection	DDS-HS307
IRWST Injection	DDS-HS308
Reactor Head Vent V150A	DDS-HS309
Reactor Head Vent V150B	DDS-HS310
Reactor Head Vent V150C	DDS-HS311
Reactor Head Vent V150D	DDS-HS312
RNS Isolation	DDS-HS313
RNS Isolation	DDS-HS314
CMT Actuation	DDS-HS315
Containment Cooling	DDS-HS317
Safeguards Actuation	DDS-HS318
Main Steamline Isolation	DDS-HS321
SG Relief Isolation	DDS-HS322
PRHR Actuation	DDS-HS323
Containment Isolation	DDS-HS327
Makeup Isolation	DDS-HS329
Feedwater Isolation	DDS-HS331
Steam Dump Mode Control	DDS-HS335
Steam Dump Stage 1 Cooldown	DDS-HS337
Steam Dump Stage 2 Cooldown	DDS-HS339
Reactor Head Vent V150A	DDS-HS340
Reactor Head Vent V150B	DDS-HS341
Reactor Head Vent V150C	DDS-HS342
Reactor Head Vent V150D	DDS-HS343
Containment Vacuum Relief	DDS-HS344