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 E.3.9.05.01.08 [Index Number 856]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of September 26, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item E.3.9.05.01.08 [Index Number 856] 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 E.3.9.05.01.08 [Index Number 856]

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Southern Nuclear Operating Company
ND-19-1088
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 & Unit 4
Completion Plan for Uncompleted ITAAC E.3.9.05.01.08 [Index Number 856]

ITAAC Statement

Program Commitment

5.1 The licensee has established a technical support center (TSC) and an onsite operations support center (OSC). [H.1]

Inspections/Tests/Analyses

5.1 An inspection of the as-built TSC and OSC will be performed, including a test of the capabilities.

Acceptance Criteria

5.1.8 Controls and displays exist in the TSC to control and monitor the status of the TSC ventilation system including heating and cooling, and the activation of the HEPA and charcoal filter system upon detection of high radiation in the TSC.

ITAAC Completion Description

Multiple ITAAC are performed to ensure that the licensee has established a technical support center (TSC) and an onsite operations support center (OSC). This ITAAC performs an inspection of the as-built TSC to confirm that controls and displays exist in the TSC to control and monitor the status of the TSC ventilation system including heating and cooling, a high-efficiency particulate air (HEPA) and charcoal filter system exists to filter TSC supply air during TSC emergency ventilation system operation, and a Radiation Monitoring System (RMS) exists which causes activation of the TSC emergency ventilation system upon detection of high radiation in the TSC ventilation system normal air supply. This ITAAC also performs testing to confirm that controls and displays in the as-built TSC are capable of controlling and monitoring TSC ventilation system operation including heating and cooling, and that the HEPA and charcoal filter system will activate upon detection of high radiation in the TSC.

Procedure XXX (Reference 1) performs a walkdown inspection of the as-built TSC Heating, Ventilation, and Air Conditioning (HVAC) system using as-built drawings and ventilation system control documentation to confirm that TSC HVAC Building Management System (BMS) controls and displays exist in the TSC to control and monitor the status of the TSC HVAC system including heating and cooling, a HEPA and charcoal filter system exists to filter TSC supply air during TSC emergency ventilation system operation, and an RMS exists which causes activation of the TSC emergency ventilation system upon detection of high radiation in the TSC HVAC system normal air supply. The results of the inspection are documented in Procedure XXX and confirm that controls and displays exist in the TSC to control and monitor the status of the TSC HVAC system including heating and cooling, a HEPA and charcoal filter system exists to filter TSC supply air during TSC emergency ventilation system operation, and an RMS exists which causes activation of the TSC emergency ventilation system upon detection of high radiation in the TSC HVAC system normal air supply.

Testing of the as-built TSC HVAC system is performed per Work Order XXXXXXX (Reference 2) and Work Order YYYYYYY (Reference 3) to confirm that TSC HVAC BMS controls and displays are capable of controlling and monitoring TSC HVAC system operation including heating and cooling, and the HEPA and charcoal filter system will activate upon detection of high radiation in the TSC. Additionally, Test Summary Report XXX (Reference 4) confirms that the measured TSC emergency ventilation system performance is bounded by the TSC

emergency ventilation system performance assumptions used in the TSC habitability dose calculation (Reference 5).

Specifically,

Work Order XXXXXXX:

> Tests the capability of the TSC HVAC BMS to manually shift the TSC HVAC system from the normal ventilation mode to the emergency ventilation mode and to control TSC HVAC system heating and cooling from the TSC HVAC BMS workstation.
>
> Confirms that the TSC HVAC BMS workstation provides displays of TSC HVAC system alignment and ventilation flow rates, HEPA and charcoal filter system alignment and status, TSC HVAC system heating and cooling status, and TSC ventilation envelope differential pressure.

Work Order YYYYYYY:

> Tests the capability of the RMS to cause the TSC HVAC system to automatically shift from the normal ventilation mode to the emergency ventilation mode upon detection of high radiation in the TSC HVAC system normal air supply.

and Test Summary Report XXX:

> Confirms that the measured HEPA and charcoal filter efficiencies, measured TSC HVAC emergency ventilation fresh air supply flow, and measured TSC ventilation envelope unfiltered air in-leakage during TSC HVAC emergency ventilation operation are bounded by the corresponding values used in Reference 5.
>
> Confirms that TSC emergency ventilation operation maintains the TSC ventilation envelope at a minimum +1/8-inch w.c. differential pressure to adjacent areas at the measured emergency ventilation fresh air supply flow.
>
> Confirms that the TSC HVAC system RMS high radiation signal is bounded by the value used in Reference 5 that causes the TSC HVAC system to shift from the normal ventilation mode to the emergency ventilation mode.

The results of the testing are documented in Work order XXXXXXX, Work Order YYYYYYY, and Test Summary Report XXX and confirm that controls and displays in the as-built TSC are capable of controlling and monitoring TSC ventilation system operation including heating and cooling, and that the HEPA and charcoal filter system will activate upon detection of high radiation in the TSC.

References 1 through 4 are available for NRC inspection as part of Unit 3 ITAAC E.3.9.05.01.08 Completion Package (Reference 6). The VEGP Unit 4 COL Appendix C ITAAC E.3.9.05.01.08 Program Commitment states "Verified on VEGP Unit 3". Since the TSC is common to both VEGP Unit 3 and Unit 4 the Unit 3 ITAAC E.3.9.05.01.08 Completion Package also verifies that the VEGP Unit 4 ITAAC E.3.9.05.01.08 Program Commitment is met.

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, As-Built TSC HVAC System Walkdown Inspection
2. Work Order XXXXXXX, As-Built TSC HVAC System Test
3. Work Order YYYYYYY, As-Built TSC HVAC RMS Isolation Test
4. Test Summary Report XXX, TSC Habitability Test Conclusions
5. 23162-000-M0C-HARA-00001, LOCA Dose in TSC
6. E.3.9.05.01.08-U3-CP-Rev0, ITAAC Completion Package
7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"