Southern Nuclear

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ND-19-1217
10 CFR 52.99(c)(3)

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 2.1.02.08d.iv [Index Number 35]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of October 7, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 2.1.02.08d.iv [Index Number 35] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.1.02.08d.iv [Index Number 35]. 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 2.1.02.08d.iv [Index Number 35]

MJY/GJL/sfr

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Southern Nuclear Operating Company
ND-19-1217
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC Item 2.1.02.08d.iv [Index No. 35]

ITAAC Statement

Design Commitment

8.d) The RCS provides automatic depressurization during design basis events.

Inspections/Tests/Analyses

iv) Type tests and analysis will be performed to determine the effective flow area through each stage 1,2,3 ADS valve.

Acceptance Criteria

iv) A report exists and concludes that the effective flow area through each stage 1 ADS valve ≥ 4.6 in^2 and each stage 2,3 ADS valve is ≥ 19 in^2.

ITAAC Completion Description

Multiple Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) are performed to demonstrate that the Reactor Coolant System (RCS) provides automatic depressurization during design basis events. This ITAAC requires type tests and analysis to determine the effective flow area through each Stage 1 Automatic Depressurization System (ADS) valve is ≥ 4.6 in^2 and the effective flow area through each Stage 2 ,3 ADS valve is ≥ 19 in^2.

Type tests and analyses are performed to determine the effective flow area through each Stage 1,2,3 ADS valve. The effective flow area for each type of valve is calculated based on the valve flow coefficient derived in accordance with ANSI/ISA-S75.02-1996 (Reference 1) from applicable test condition data and the flow test results with the valve in the fully open position. The ADS valve type test analysis reports (References 2 and 3) demonstrate that the effective flow area for the Stage 1 ADS valve is X.X in^2 and the Stage 2 and 3 ADS valve is XX.X in^2 and meets the ITAAC acceptance criteria.

List of ITAAC Findings

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found that there are no relevant ITAAC findings associated with these ITAAC. The ITAAC completion review is documented in the ITAAC Completion Packages for ITAAC 2.1.02.08d.iv Unit 3 and Unit 4 (Reference 4 and 5) and are available for NRC review.

References (available for NRC inspection)

1. ANSI/ISA-S75.02-1996, "Control Valve Capacity Test Procedures"
2. Unit 3 Principle Closure Document, XXX-XXX-XXX-XXXXXX
3. Unit 4 Principle Closure Document, XXX-XXX-XXX-XXXXXX
4. 2.1.02.08d.iv-U3-CP-Rev0, ITAAC Completion Package
5. 2.1.02.08d.iv-U4-CP-Rev0, ITAAC Completion Package
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"