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52-026ND-19-1116
10 CFR 52.99(c)(3)U.S. Nuclear Regulatory Commission
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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 2.5.02.12 [Index Number 551]

Ladies and Gentlemen:

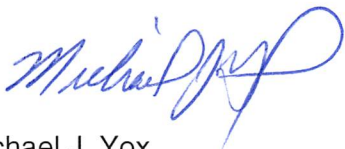
Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of October 15, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.5.02.12 [Index Number 551] has not been completed 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 & 4Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.5.02.12 [Index Number 551]

MJY/SBB/sfr

U.S. Nuclear Regulatory Commission

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**Southern Nuclear Operating Company
ND-19-1116
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.5.02.12 [Index Number 551]**

ITAAC Statement

Design Commitment

12. The PMS software is designed, tested, installed, and maintained using a process which incorporates a graded approach according to the relative importance of the software to safety and specifies requirements for:

- a) Software management including documentation requirements, standards, review requirements, and procedures for problem reporting and corrective action.
- b) Software configuration management including historical records of software and control of software changes.
- c) Verification and validation including requirements for reviewer independence.

Inspections/Tests/Analyses

Inspection will be performed of the process used to design, test, install, and maintain the PMS software.

Acceptance Criteria

A report exists and concludes that the process establishes a method for classifying the PMS software elements according to their relative importance to safety and specifies requirements for software assigned to each safety classification. The report also concludes that requirements are provided for the following software development functions:

- a) Software management including documentation requirements, standards, review requirements, and procedures for problem reporting and corrective action. Software management requirements may be documented in the software quality assurance plan, software management plan, software development plan, software safety plan, and software operation and maintenance plan; or these requirements may be combined into a single software management plan.
- b) Software configuration management including historical records of software and control of software changes. Software configuration management requirements are provided in the software configuration management plan.
- c) Verification and validation including requirements for reviewer independence. Verification and validation requirements are provided in the verification and validation plan.

ITAAC Completion Description

An inspection is performed to verify that the Protection and Safety Monitoring System (PMS) software is designed, tested, installed, and maintained using a process which incorporates a graded approach according to the relative importance of the software to safety and specifies requirements for software management including documentation requirements, standards, review requirements, procedures for problem reporting and corrective action, software

configuration management (including historical records of software and control of software changes), and verification and validation including requirements for reviewer independence.

PMS is developed by the vendor using defined processes per WCAP-16096-P (Reference 1) as supplemented by WCAP-15927-P (Reference 2). The defined processes are further incorporated into the vendor's processes and procedures that include software management, software configuration management, and verification and validation.

An inspection of the vendor's processes and procedures used to design, test, install, and maintain the PMS software was performed and it was concluded that the process establishes a method for classifying the PMS software elements according to their relative importance to safety and specifies requirements for software assigned to each safety classification. The inspection also concluded that requirements are provided for the following software development functions:

- Software management including documentation requirements, standards, review requirements, procedures for problem reporting and corrective action,
- Software configuration management (including historical records of software and control of software changes),
- Software configuration management requirements are provided in the software configuration management plan,
- Verification and validation (including requirements for reviewer independence),
- Verification and validation (V&V) requirements are provided in the verification and validation plan, and
- Software management requirements are documented in the AP1000 I&C Protection and Safety Monitoring System Project, Software Development and Security Plans.

Technical report APP-GW- GLR-155 "AP1000 Design Certification ITAAC 2.5.02.12: The Process Used to Design, Test, Install, and Maintain the PMS Software Technical Report" (Reference 3) documents the results of the inspection and includes references to vendor processes and procedures that define each of the Acceptance Criteria.

Software maintenance will continue post software delivery. The vendor will continue to perform the software maintenance functions (management, configuration management and V&V) according to the above processes and WCAP-16096-P (Reference 1).

References 1 through 3 are available for NRC inspection as part of the ITAAC 2.5.02.12 Unit 3 and 4 Completion Packages (References 4 and 5).

List of ITAAC Findings

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company 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-P "Software Program Manual"
2. WCAP-15927-P "Design Process for AP1000 Common Q Safety Systems"
3. APP-GW-GLR-155 "AP1000 Design Certification ITAAC 2.5.02.12: The Process Used to Design, Test, Install, and Maintain the PMS Software Technical Report"
4. ITAAC 2.5.02.12-U3-CP-Rev0, "ITAAC Completion Package"
5. ITAAC 2.5.02.12-U4-CP-Rev0, "ITAAC Completion Package"
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"