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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 C.3.8.02.01 [Index Number 843]

Ladies and Gentlemen:

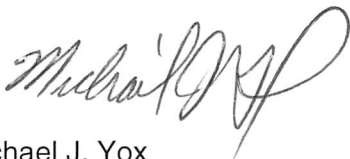
Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of October 25, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item C.3.8.02.01 [Index Number 843] has not been 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

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Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC C.3.8.02.01 [Index Number 843]

MJY/GCW/sfr

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**Southern Nuclear Operating Company
ND-18-1316
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC C.3.8.02.01 [Index Number 843]**

ITAAC Statement

Design Commitment

The American Society of Mechanical Engineers (ASME) Code, Section III piping is designed in accordance with the ASME Code, Section III requirements.

Inspections/Tests/Analyses

Inspection of the ASME Code Design Reports (NCA-3550) and required documents will be conducted for the set of lines chosen to demonstrate compliance.

Acceptance Criteria

The ASME Code Design Report(s) (NCA-3550) (certified, when required by the ASME Code) exist and conclude that the design of the piping for lines chosen to demonstrate all aspects of the piping design complies with the requirements of the ASME Code section.

ITAAC Completion Description

Inspection of American Society of Mechanical Engineers (ASME) Code Design Reports (NCA-3550) and required documents is conducted for the set of lines chosen to demonstrate compliance with the Code, Section III piping design requirements. Classifications of AP1000 piping systems are defined in Section 3.2 of the VEGP Updated Final Safety Analysis Report (UFSAR) (Reference 1). The as-designed piping acceptance criteria (DAC) are documented in certified ASME Code Design Reports (P0Rs). Piping lines chosen to demonstrate all aspects of the piping design including ASME Section III piping analysis, support evaluations and piping component fatigue analysis for Class 1 piping are defined in UFSAR Subsection 3.9.8.7 (Reference 1) and are designed in accordance with the ASME Boiler and Pressure Vessel (B&PV) Code, Section III (ASME Code) requirements 1998 Edition, 2000 Addenda, with additional restrictions for piping design as described in VEGP UFSAR Subsection 5.2.1 (Reference 1). The lines chosen to demonstrate compliance with the ASME Code are listed in Attachment A. Stress Reports identified as Piping Packages (Pipe Line Reports-PLRs) on Attachment A are listed in the ITAAC Unit 3 C.3.8.02.01 Completion Package and ITAAC Unit 4 C.3.8.02.01 Completion Package (References 2 and 3) and represent the required input (document) to the ASME Code Design Reports (P0Rs).

Certified ASME Code Design Reports are issued and maintained as quality records and document the inspection of each of the as-designed stress reports. The scope of inspection includes the following areas:

- The piping system Design Specification in accordance with ASME Code Section III, Subsection NCA-3252, including loading definitions and load combinations.
- Thermal Analysis, in accordance with ASME Code Section III, Appendix C-1200, and applicable Subsection NB, NC or ND.
- Structural Analysis, in accordance with ASME Code Section III, Appendix C-1300, and applicable Subsection NB, NC or ND.
- Fatigue Analysis for the Class 1 piping in accordance with ASME Code Section III, Appendix C-1400, and applicable Subsection NB.

Inspections of the certified ASME Code Design Reports listed in Attachment A and other required documents such as design specifications and the associated supporting calculations verify that the design of each chosen set of piping complies with the requirements of ASME Code, Section III. The certified ASME Code Design Reports are documented in ITAAC Unit 3 C.3.8.02.01 Completion Package and ITAAC Unit 4 C.3.8.02.01 Completion Package (References 2 and 3) and are available for NRC inspection.

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. The ITAAC completion review is documented in the ITAAC Completion Packages for ITAAC C.3.8.02.01 for Unit 3 and Unit 4 (References 2 and 3) and are available for NRC inspection.

References (available for NRC inspection)

1. VEGP 3&4 Updated Final Safety Analysis Report
 - a. Subsection 3.2 Classification of Structures, Components, and Systems
 - b. Subsection 3.9.8.7 As Designed Piping Analysis
 - c. Subsection 5.2.1 Compliance with Codes and Code Cases,
 - d. Table 3.9-20 Piping Packages Chosen to Demonstrate Piping Design for Piping DAC Closure
2. C.3.8.02.01-U3-CP-Rev0, ITAAC Completion Package
3. C.3.8.02.01-U4-CP-Rev0, ITAAC Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A (Sheet 1 of 2)
Piping Packages and Design Reports
Chosen to Demonstrate Piping Design for Piping DAC Closure

ASME Class*	Line Description*	Piping Package Number*	Certified Design Report(s)
2*	Hot Leg 2 I&C*	APP-RCS-PLR-210*	APP-RCS-P0R-210
1,3*	Reactor Head Vent*	APP-RCS-PLR-230*	APP-RCS-P0R-230
2*	Hot Leg 1 I&C*	APP-RCS-PLR-260*	APP-RCS-P0R-260
2*	Hot Leg 1 Sampling*	APP-RCS-PLR-460*	APP-RCS-P0R-460
2*	Hot Leg 2 Sampling*	APP-RCS-PLR-470*	APP-RCS-P0R-470
2*	Pressurizer Sampling*	APP-RCS-PLR-480*	APP-RCS-P0R-480
2*	Pressurizer I&C*	APP-RCS-PLR-510*	APP-RCS-P0R-510
2/3*	Component Cooling from Penetration C01 IRC*	APP-CCS-PLR-040*	APP-CCS-P0R-040
2/3*	Component Cooling from Penetration C02 IRC*	APP-CCS-PLR-050*	APP-CCS-P0R-050
2/3*	CVS Makeup from Penetration C03 IRC*	APP-CVS-PLR-090*	APP-CVS-P0R-090
2/3*	CVS Letdown from Penetration 002 IRC 2*	APP-CVS-PLR-100*	APP-CVS-P0R-100
2/3*	ACC-A/B3 Makeup*	APP-PXS-PLR-620*	APP-PXS-P0R-620
2/3*	SFS from Penetration C01*	APP-SFS-PLR-600*	APP-SFS-P0R-600
2/3*	Feedwater to SG 01*	APP-SGS-PLR-010*	APP-SGS-P0R-010
2/3*	Feedwater to SG 02*	APP-SGS-PLR-020*	APP-SGS-P0R-020
2/3*	Main Steam to SG 01*	APP-SGS-PLR-030*	APP-SGS-P0R-030
2/3*	Main Steam to SG 02*	APP-SGS-PLR-040*	APP-SGS-P0R-040
2/3*	SG01 Blowdown to Penetration C03A*	APP-SGS-PLR-070*	APP-SGS-P0R-070
2/3*	SG02 Blowdown to Penetration C03B*	APP-SGS-PLR-080*	APP-SGS-P0R-080
2/3*	SG01 Startup Feed Water from Penetration C05A*	APP-SGS-PLR-310*	APP-SGS-P0R-310
2/3*	SG02 Startup Feed Water from Penetration C05B*	APP-SGS-PLR-320*	APP-SGS-P0R-320
2/3*	VWS Supply from Containment Penetration C02*	APP-VWS-PLR-500*	APP-VWS-P0R-500
2/3*	VWS Return to Containment Penetration C01*	APP-VWS-PLR-530*	APP-VWS-P0R-530
2/3*	Component Cooling from Penetration C01 ORC*	APP-CCS-PLR-810*	APP-CCS-P0R-810
2/3*	Component Cooling from Penetration C02 ORC*	APP-CCS-PLR-820*	APP-CCS-P0R-820

Attachment A (Sheet 2 of 2)
Piping Packages Chosen to Demonstrate Piping
Design for Piping DAC Closure

ASME Class*	Line Description*	Piping Package Number *	Certified Design Report(s)
2/3*	CVS Makeup from Penetration C03 ORC*	APP-CVS-PLR-530*	APP-CVS-P0R-530
2/3*	PCS Recirculation, DWS Supply, and FPS Supply*	APP-PCS-PLR-100*	APP-PCS-P0R-100
2/3*	From Spent Fuel to RNS and PCCWST Drain*	APP-RNS-PLR-100*	APP-RNS-P0R-100
2/3*	Normal RHR to Heat Exchangers and Pumps from Containment Penetrations C01 and C02*	APP-RNS-PLR-170*	APP-RNS-P0R-170
2/3*	Spent Fuel Cooling Module R3-65*	APP-SFS-PLR-350*	APP-SFS-P0R-350
2/3*	SG01 Startup Feedwater to Penetration C05A*	APP-SGS-PLR-110*	APP-SGS-P0R-110
2/3*	SG02 Startup Feedwater to Penetration C05B*	APP-SGS-PLR-120*	APP-SGS-P0R-120
2/3*	Nonradioactive Vent Return from Main Control Room*	APP-VBS-PLR-010*	APP-VBS-P0R-010
2/3*	Nonradioactive Vent Supply to Main Control Room*	APP-VBS-PLR-030*	APP-VBS-P0R-030
2/3*	VWS Supply to Containment Penetration C02*	APP-VWS-PLR-910*	APP-VWS-P0R-910
2/3*	VWS Return from Containment Penetration C01*	APP-VWS-PLR-920*	APP-VWS-P0R-920
1	Direct Vessel Injection A	APP-PXS-PLR-010	APP-PXS-P0R-010
1	Direct Vessel Injection B	APP-PXS-PLR-020	APP-PXS-P0R-020
1	Supply to CMT 02A	APP-PXS-PLR-050	APP-PXS-P0R-050
1	Supply to CMT 02B	APP-PXS-PLR-060	APP-PXS-P0R-060
1	Normal Residual Heat Removal Suction Loop 2	APP-RNS-PLR-010	APP-RNS-P0R-010
1	ADS Stage 4 Loop1 and PRHR HX Inlet Isolation	APP-PXS-PLR-030	APP-PXS-P0R-030
1	PRHR HX Return Loop 1	APP-PXS-PLR-040	APP-PXS-P0R-040
1	ADS 1,2 & 3 and Pressurizer Safety Valve Inlets	APP-RCS-PLR -010	APP-RCS-P0R-010
1	Press. Spray, Aux. Spray, CVS Letdown, CVS Charging	APP-RCS-PLR-020	APP-RCS-P0R-020
1	4TH Stage ADS East Loop 2	APP-RCS-PLR-030	APP-RCS-P0R-030
1	PZR Surge Line Loop 1	APP-RCS-PLR-040	APP-RCS-P0R-040
1	Primary Loop	APP-RCS-PLR-050	APP-RCS-P0R-050

* Excerpted from UFSAR Table 3.9-20 in addition to Class 1 lines larger than 1 inch in diameter