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Docket Nos.: 52-025
52-026

ND-19-1309
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission
Document Control Desk
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 2.2.02.07a.iii [Index Number 137]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of October 28, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 2.2.02.07a.iii [Index Number 137] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.2.02.07a.iii [Index Number 137]. 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 3and4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.02.07a.iii [Index Number 137]

MJY/GJL/sfr

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**Southern Nuclear Operating Company
ND-19-1309
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC Item 2.2.02.07a.iii [Index No. 137]**

ITAAC Statement

Design Commitment

7.a) The PCS delivers water from the PCCWST to the outside, top of the containment vessel.

7.f) The PCS provides a flow path for long-term water makeup from the PCCWST to the spent fuel pool.

8.a) The PCCAWST contains an inventory of cooling water sufficient for PCS containment cooling from hour 72 through day 7.

Inspections/Tests/Analyses

iii) Inspection will be performed to determine the PCCWST standpipes elevations.

ii) Inspection of the PCCWST will be performed.

Inspection of the PCCAWST will be performed.

Acceptance Criteria

iii) The elevations of the standpipes above the tank floor are:

- 16.8 ft ± 0.2 ft
- 20.3 ft ± 0.2 ft
- 24.1 ft ± 0.2 ft

ii) The volume of the PCCWST is greater than 756,700 gallons.

The volume of the PCCAWST is greater than 780,000 gallons.

ITAAC Completion Description

Multiple ITAAC are performed to demonstrate that the Passive Containment Cooling System (PCS); delivers water from the Passive Containment Cooling Water Storage Tank (PCCWST) to the outside, top of the containment vessel; provides a flow path for long-term water makeup from the PCCWST to the spent fuel pool; and the Passive Containment Cooling Ancillary Water Storage Tank (PCCAWST) contains an inventory of cooling water sufficient for PCS containment cooling from hour 72 through day 7. The subject ITAAC requires that an inspection be performed to determine the PCCWST standpipes elevations; an inspection be performed of the PCCWST to verify that the volume of the PCCWST is greater than 756,700 gallons; and an inspection be performed of the PCCAWST to verify that the volume of the PCCAWST is greater than 780,000 gallons.

iii) The elevations of the standpipes above the tank floor are:

- 16.8 ft ± 0.2 ft
- 20.3 ft ± 0.2 ft
- 24.1 ft ± 0.2 ft

The inspection to determine the PCCWST standpipes elevations is performed in the PCCWST module after its installation at the top of the shield building. The PCCWST standpipes are identified in the VEGP 3&4 Updated Final Safety Analysis Report (UFSAR), Table 6.2.2-2, Component Data Passive Containment Cooling System (Nominal) (Reference 1) as the Third Standpipe, Second Standpipe, and Top Standpipe. The PCCWST standpipes elevations are measured using survey equipment in accordance with site survey and measurement procedure (Reference 2). The elevations of the standpipes above the PCCWST tank floor are determined by measuring the distance between the PCCWST floor and the opening at the high point of the inlet at each standpipe.

The inspection results are documented in the Unit 3 and Unit 4 Principal Closure Documents XXX (References 3 and 4), and determined that the elevations of the standpipes above the tank floor are:

Unit 3

- xx.x ft (Third Standpipe)
- yy.y ft (Second Standpipe)
- zz.z ft (Top Standpipe)

Unit 4

- xx.x ft (Third Standpipe)
- yy.y ft (Second Standpipe)
- zz.z ft (Top Standpipe)

The inspection results verify that the elevations of the standpipes above the tank floor are:

- 16.8 ft± 0.2 ft (Third Standpipe)
- 20.3 ft± 0.2 ft (Second Standpipe)
- 24.1 ft ± 0.2 ft (Top Standpipe)

Unit 3 and Unit 4 Principal Closure Documents XXX are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.2.02.07a.iii Completion Packages.

ii) The volume of the PCCWST is greater than 756,700 gallons.

VEGP 3&4 UFSAR, Table 14.3-2, Design Basis Accident Analysis, (Reference 1) references the PCCWST capacity for the spent fuel pool long-term water makeup volume to VEGP 3&4 UFSAR, Table 6.2.2-1, Passive Containment Cooling System Performance Parameters, (Reference 1). UFSAR Tables 14.3-2 and 6.2.2-1 identify that the PCCWST volume for the spent fuel pool long-term water makeup is a minimum of 756,700 gallons. The volume of the PCCWST providing a flow path for long-term water makeup is determined by the following method:

The dimensions of the PCCWST, below the PCCWST standpipe elevation which begins feeding the Fire Protection System (FPS), are measured and recorded following tank installation by both the tank vendor and site. Site measurements are performed using survey equipment in accordance with site survey and measurement procedure (Reference 2). The PCCWST usable volume for the spent fuel pool long-term water makeup is calculated, using the survey measurements, and compared to the ITAAC acceptance criteria of greater than 756,700 gallons.

The inspection results of the PCCWST volume determination are documented in the Unit 3 and Unit 4 Principal Closure Documents YYY (References 5 and 6), and determined that the volume of the PCCWST (Tag No. PCS-MT-01) is XXX,XXX gallons for Unit 3 , and XXX,XXX for Unit 4. This confirms that the volume of the PCCWST is greater than 756,700 gallons.

The Unit 3 and Unit 4 Principal Closure Documents YYY are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.2.02.07a.iii Completion Packages.

The volume of the PCCAWST is greater than 780,000 gallons.

VEGP 3 and 4 Updated Final Safety Analysis Report, Table 6.2.2-2, Component Data Passive Containment Cooling System (Nominal) (Reference 1) identifies that the nominal volume of the PCCAWST is 885,000 gallons. The nominal volume of the PCCAWST is determined by the following method:

As-built measurements of the PCCAWST are taken by the tank vendor. These measurements are recorded and used to calculate the nominal volume of the PCCWST minus unavailable volume due to tank internals, and compared to the volume acceptance criteria of greater than 780,000 gallons.

The inspection results of the PCCAWST volume determination are documented in the Unit 3 and Unit 4 Principal Closure Documents ZZZ (References 7 and 8), and the calculated nominal volume of the PCCAWST (Tag No. PCS-MT-05) is XXX,XXX gallons for Unit 3, and XXX,XXX for Unit 4. This confirms that the volume of the PCCAWST is greater than 780,000 gallons.

Unit 3 and Unit 4 Principal Closure Documents ZZZ is available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.2.02.07a.iii Completion Packages.

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 2.2.02.07a.iii for Unit 3 and Unit 4 (References X and X) and are available for NRC review.

References (available for NRC inspection)

1. VEGP 3&4 UFSAR, Revision 8.1
2. 26139-000-4MP-T81C-N3201, Rev. 5, "Bechtel Construction Survey"
3. Unit 3 Principal Closure Document XXX
4. Unit 4 Principal Closure Document XXX
5. Unit 3 Principal Closure Document YYY
6. Unit 4 Principal Closure Document YYY
7. Unit 3 Principal Closure Document ZZZ
8. Unit 4 Principal Closure Document ZZZ
9. 2.2.02.07a.iii-U3-CP-Rev0, ITAAC Completion Package
10. 2.2.02.07a.iii-U4-CP-Rev0, ITAAC Completion Package

11. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"