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Docket No.: 52-025

ND-19-1304
10 CFR 52.99(c)(1)

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
ITAAC Closure Notification on Completion of ITAAC 2.2.03.08c.vi.03 [Index Number 191]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.03.08c.vi.03 [Index Number 191] for verifying the water volume of the In-containment Refueling Water Storage Tank (IRWST) is greater than or equal to 73,100 cubic feet. The closure process for this ITAAC is based on 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.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

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
Completion of ITAAC 2.2.03.08c.vi.03 [Index Number 191]

MJY/GCW/sfr

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**Southern Nuclear Operating Company
ND-19-1304
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 2.2.03.08c.vi.03 [Index Number 191]**

ITAAC Statement

Design Commitment

8.c) The PXS provides RCS makeup, boration, and safety injection during design basis events.

Inspections, Tests, Analyses

vi) Inspections of each of the following tanks will be conducted:

3.– IRWST

Acceptance Criteria

vi) The calculated volume of each of the following tanks is as follows:

3. IRWST $\geq 73,100 \text{ ft}^3$
between the tank outlet connection and the tank overflow

ITAAC Determination Basis

Multiple ITAAC are performed to demonstrate that the Passive Core Cooling System (PXS) provides Reactor Coolant System (RCS) makeup, boration, and safety injection during design basis events. This ITAAC performs an inspection to verify the volume of the In-containment Refueling Water Storage Tank (IRWST) between the tank outlet connection and the tank overflow is greater than or equal to $73,100 \text{ ft}^3$.

An inspection was performed of measurements made inside the IRWST. A laser scanner was used to determine the inside volume between the tank outlet connection and the tank overflow. Various scanner locations were used within the tank to provide a complete scanned coverage of the internal surface of the IRWST. One complete data file consisting of the composite of the scans which represents the entire internal surface of the IRWST was analyzed. Significant permanent features that displace the useable tank volume such as the passive residual heat removal heat exchanger, the integrated head package stand, and the automatic depressurization system spargers, were represented in the scanned volume and mathematically removed from the IRWST useable volume. Smaller permanent features such as ladders were conservatively accounted for from the design calculation and also removed from the useable volume.

Measurements were taken using survey equipment in accordance with 26139-000-4MP-T81C-N3201, "Construction Survey" (Reference 1). The calculated volume of the IRWST represented by the 3-D model developed from the scanned data between the tank outlet connection and the tank overflow was determined to be $74,412 \text{ ft}^3$ which meets the minimum volume of $73,100 \text{ ft}^3$ specified in the ITAAC Acceptance Criteria. The results of the inspection are documented in the Principal Closure Document SV3-PXS-FSK-800191 (Reference 2) and is available for NRC inspection as part of the Unit 3 ITAAC completion package (Reference 3).

ITAAC Finding Review

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 this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.2.03.08c.vi.03 (Reference 3) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.2.03.08c.vi.03 was performed for VEGP Unit 3 and that the prescribed acceptance criteria were met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. 26139-000-4MP-T81C-N3201, Rev. 5, "Construction Survey"
2. SV3-PXS-FSK-800191, Rev. 0, "ITAAC Verification Volume of the IRWST"
3. 2.2.03.08c.vi.03-U3-CP-Rev0, ITAAC Completion Package