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10 CFR 52.99(c)(1)U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555-0001Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Unit 3 and Unit 4  
ITAAC Closure Notification on Completion of ITAAC E.3.9.05.01.08 [Index Number 856]

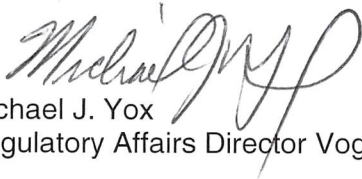
Ladies and Gentlemen:

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 E.3.9.05.01.08 [Index Number 856]. This ITAAC confirms that controls and displays exist in the Technical Support Center (TSC) to control and monitor the status of the TSC ventilation system including heating and cooling, and the activation of the TSC emergency ventilation system upon detection of high radiation in the TSC ventilation system normal air supply. The VEGP Unit 4 COL Appendix C ITAAC Index Number 856 Program Commitment states "Verified on VEGP Unit 3". Since the TSC is common to both VEGP Unit 3 and Unit 4, the Unit 3 ITAAC E.3.9.05.01.08 Completion Package also verifies that the VEGP Unit 4 ITAAC Index Number 856 Program Commitment is met. The closure process for this ITAAC is based on the guidance described in Nuclear Energy Institute (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 & 4Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion of Unit 3 ITAAC E.3.9.05.01.08 [Index Number 856] and Unit 4 ITAAC  
[Index Number 856]

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**Southern Nuclear Operating Company  
ND-20-0698  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion of Unit 3 ITAAC E.3.9.05.01.08 [Index Number 856]  
and Unit 4 ITAAC [Index Number 856]**

## **ITAAC Statement**

### **Program Commitment**

5.1 The licensee has established a technical support center (TSC) and an onsite operations support center (OSC). [H.1]

### **Inspections/Tests/Analyses**

5.1 An inspection of the as-built TSC and OSC will be performed, including a test of the capabilities.

### **Acceptance Criteria**

5.1.8 Controls and displays exist in the TSC to control and monitor the status of the TSC ventilation system including heating and cooling, and the activation of the HEPA and charcoal filter system upon detection of high radiation in the TSC.

## **ITAAC Determination Basis**

Multiple ITAAC are performed to ensure that the licensee has established a technical support center (TSC) and an onsite operations support center (OSC). This ITAAC performed an inspection of the as-built TSC to confirm that: controls and displays exist in the TSC to control and monitor the status of the TSC ventilation system including heating and cooling, a high-efficiency particulate air (HEPA) and charcoal filter system exists to filter TSC supply air during TSC emergency ventilation system operation, and a Radiation Monitoring System (RMS) exists which causes activation of the TSC emergency ventilation system upon detection of high radiation in the TSC ventilation system normal air supply. This ITAAC also performed testing to confirm that controls and displays in the as-built TSC are capable of controlling and monitoring TSC ventilation system operation including heating and cooling, and that the HEPA and charcoal filter system will activate upon detection of high radiation in the TSC ventilation system normal air supply.

SV3-TSC-ITR-800856 (Reference 1) performed a walkdown inspection of the as-built TSC Heating, Ventilation, and Air Conditioning (HVAC) system using as-built drawings and ventilation system control documentation to confirm that: TSC HVAC Building Management System (BMS) controls and displays exist in the TSC to control and monitor the status of the TSC HVAC system including heating and cooling, a HEPA and charcoal filter system exists to filter TSC supply air during TSC emergency ventilation system operation, and an RMS exists which causes activation of the TSC emergency ventilation system upon detection of high radiation in the TSC HVAC system normal air supply. The results of the inspection are documented in Reference 1 and confirm that: controls and displays exist in the TSC to control and monitor the status of the TSC HVAC system including heating and cooling, a HEPA and charcoal filter system exists to filter TSC supply air during TSC emergency ventilation system operation, and an RMS exists which causes activation of the TSC emergency ventilation system upon detection of high radiation in the TSC HVAC system normal air supply.

Testing of the as-built TSC HVAC system was performed per SV3-TSC-ITR-801856 (Reference 2) and SV3-TSC-ITR-802856 (Reference 3) to confirm that TSC HVAC BMS controls and displays are capable of controlling and monitoring TSC HVAC system operation including heating and cooling, and that the HEPA and charcoal filter system will activate upon detection of high radiation in the TSC. Additionally, SV3-TSC-ITR-803856 (Reference 4) confirmed that the

measured TSC emergency ventilation system performance is bounded by the TSC emergency ventilation system performance assumptions used in the TSC habitability dose calculation (Reference 5).

Specifically,

SV3-TSC-ITR-801856:

Tested the capability of the TSC HVAC BMS to manually shift the TSC HVAC system from the normal ventilation mode to the emergency ventilation mode and to control TSC HVAC system heating and cooling from the TSC HVAC BMS workstation.

Confirmed that the TSC HVAC BMS workstation provides displays of TSC HVAC system alignment and ventilation flow rates, HEPA and charcoal filter system alignment and status, TSC HVAC system heating and cooling status, and TSC ventilation envelope differential pressure.

SV3-TSC-ITR-802856:

Tested the capability of the RMS to cause the TSC HVAC system to automatically shift from the normal ventilation mode to the emergency ventilation mode upon detection of a high radiation signal in the TSC HVAC system normal air supply.

SV3-TSC-ITR-803856:

Confirmed that the measured HEPA and charcoal filter efficiencies, measured TSC HVAC emergency ventilation fresh air supply flow, and measured TSC ventilation envelope unfiltered air in-leakage during TSC HVAC emergency ventilation operation were bounded by the corresponding values used in Reference 5.

Confirmed that TSC emergency ventilation operation maintained the TSC ventilation envelope at a minimum +1/8-inch w.c. differential pressure to adjacent areas at the measured emergency ventilation fresh air supply flow.

Confirmed that the TSC HVAC system RMS high radiation signal is bounded by the value used in Reference 5 that causes the TSC HVAC system to shift from the normal ventilation mode to the emergency ventilation mode.

The results of the testing are documented in SV3-TSC-ITR-801856, SV3-TSC-ITR-802856, and SV3-TSC-ITR-803856, and confirm that controls and displays in the as-built TSC are capable of controlling and monitoring TSC ventilation system operation including heating and cooling, and that the HEPA and charcoal filter system will activate upon detection of high radiation in the TSC.

References 1 through 4 are available for NRC inspection as part of the Unit 3 ITAAC E.3.9.05.01.08 Completion Package (Reference 6). The VEGP Unit 4 COL Appendix C ITAAC Index Number 856 Program Commitment states "Verified on VEGP Unit 3". Since the TSC is common to both VEGP Unit 3 and Unit 4 the Unit 3 ITAAC E.3.9.05.01.08 Completion Package also verifies that the VEGP Unit 4 ITAAC Index Number 856 Program Commitment is met.

### **ITAAC Finding Review**

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 Package for ITAAC E.3.9.05.01.08 (Reference 6) and is available for NRC review.

### **ITAAC Completion Statement**

Based on the above information, SNC hereby notifies the NRC that ITAAC E.3.9.05.01.08 was performed for VEGP Unit 3 and that the prescribed acceptance criteria were met. Since the TSC is common to both VEGP Unit 3 and Unit 4, the Unit 3 ITAAC E.3.9.05.01.08 Completion Package also verifies that the VEGP Unit 4 ITAAC Index Number 856 Program Commitment is 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. SV3-TSC-ITR-800856, Rev. 0, "Unit 3 ITAAC 856 Walkdown Inspection: ITAAC E.3.9.05.01.08"
2. SV3-TSC-ITR-801856, Rev. 0, "Unit 3 ITAAC 856 TSC HVAC System Test: ITAAC E.3.9.05.01.08"
3. SV3-TSC-ITR-802856, Rev. 0, "Unit 3 ITAAC 856 TSC HVAC Radiation Monitor Test: ITAAC E.3.9.05.01.08"
4. SV3-TSC-ITR-803856, Rev. 0, "Unit 3 ITAAC 856 TSC HVAC Compliance with TSC Dose Analysis Assumptions: ITAAC E.3.9.05.01.08"
5. SV0-SSAR-XMC-2019-001, Version 1.0, "BECHTEL CALCULATION 23162-000-M0C-HARA-00001 REV 000"
6. E.3.9.05.01.08-U3-CP-Rev0, ITAAC Completion Package