Southern Nuclear

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U.S. Nuclear Regulatory Commission
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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load
Item 2.1.02.08d.v [Index Number 36]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of October 15, 2020, Vogtle Electric Generating Plant (VEGP) Unit 4 Uncompleted Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 2.1.02.08d.v [Index Number 36] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.1.02.08d.v [Index Number 36]. 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

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4 Completion Plan for Uncompleted ITAAC Item 2.1.02.08d.v [Index Number 36]

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Southern Nuclear Operating Company
ND-20-1221
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 4
Completion Plan for Uncompleted ITAAC Item 2.1.02.08d.v [Index Number 36]

ITAAC Statement

Design Commitment

8.d) The RCS provides automatic depressurization during design basis events.

Inspections/Tests/Analyses

v) Inspections of the elevation of the ADS stage 4 valve discharge will be conducted.

vi) Inspections of the ADS stage 4 valve discharge will be conducted.

viii) Inspection of the elevation of each ADS sparger will be conducted.

Acceptance Criteria

v) The minimum elevation of the bottom inside surface of the outlet of these valves is greater than plant elevation 110 feet.

vi) The discharge of the ADS stage 4 valves is directed into the steam generator compartments.

viii) The centerline of the connection of the sparger arms to the sparger hub is ≤ 11.5 feet below the IRWST overflow level.

ITAAC Completion Description

Multiple ITAAC are performed to demonstrate that the Vogtle Electric Generating Plant (VEGP) Unit 4 Reactor Coolant System (RCS) provides automatic depressurization during design basis events. This ITAAC requires that inspections be conducted to verify that the minimum elevation of the bottom inside surface of the outlet of the Automatic Depressurization System (ADS) stage 4 valves is greater than plant elevation 110 feet, that the discharge of the ADS stage 4 valves is directed into the steam generator compartments, and that for each ADS sparger (Sparger A and Sparger B) the centerline of the connection of the sparger arms to the sparger hub is ≤ 11.5 feet below the In-containment Refueling Water Storage Tank (IRWST) overflow level.

During fabrication of the ADS stage 4 valves, the vendor measures key dimensions, including the valve body outlet circular dimension, which when halved and subtracted from the RCS line centerline elevation, is the elevation of the bottom inside surface of the outlet of the ADS stage 4 valves. The dimensional inspections are performed at the vendor's facility using both standard industry measurement techniques and specialized equipment. Due to the nature of the manufacturing process of the ADS stage 4 valves (i.e., 14" squib valves), it is necessary to verify measurements are within the acceptable ITAAC ranges prior to shipment. Completion of these measurements at the vendor's facility is standard industry practice and is specified in the procurement specification. Completing these measurements at the vendor's facility meets the

definition of "as-built inspections" per NEI 08-01, Section 9.5, "As-built Inspections" (Reference 1). The results of the measurements are included in the Vogtle Unit 4 ADS-4 Stage Valve Quality Release & Certificate of Conformance (Reference 2).

An inspection of the routing of the RCS lines associated with the ADS stage 4 valves is performed during a walk down of the as-built lines in accordance with the site walk down inspection procedure (Reference 3) to confirm that the discharge of ADS stage 4 valves, which are installed at the end of the RCS lines, is directed into the steam generator compartments.

The elevation of the RCS lines, Sparger A and B hub centerlines, and IRWST overflow level is determined using survey equipment in accordance with site survey and measurement procedures (Reference 4).

The walk down and survey inspection results are documented in the Unit 4 inspection reports (References 5 and 6) and reflected in Attachments A and B, which demonstrate that the acceptance criteria of the ITAAC have been met. References 2 through 6 are available for NRC inspection as part of the ITAAC 2.1.02.08d.v Completion Package (Reference 7).

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 this ITAAC.

References (available for NRC inspection)

1. NEI 08-01, Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52
2. SV4-PV70-VQQ-002 Revision X, Quality Release & Certificate of Conformance (QR & C of C) 14" Squib Valve Assembly
3. NCSP02-24 Rev X, ITAAC Support Activities (AP 1000)
4. 4MP-T81C-N3201 Rev X, Construction Survey
5. SV4-RCS-P0K-800036 Rev X, ADS Stage 4 Valves Elevation of Bottom Inside Surface of Outlet and Direction of Discharge
6. SV4-MW01-V0K-891550 Rev X, UNIT 4 ADS Sparger As-built Elevation Verification
7. 2.1.02.08d.v-U4-CP-Rev0, ITAAC Completion Package

Attachment A

ADS-4 Valve Discharge and Measured Elevations (Reference 5)

Component Name*	Tag No.*	ADS-4 Valve Discharge	RCS Line/Plant Elevation (Feet)	Half Valve Outlet Dimension (Feet)	ADS-4 Valve Outlet Bottom Inside Surface Plant Elevation (Feet)
Fourth-stage ADS Squib Valve	RCS-PL-V004A	East (SG-1) Room 11301	RCS-PL-L133A /+XXX.XXX	X.XXX	+ XXX.XXX
Fourth-stage ADS Squib Valve	RCS-PL-V004B	West (SG-2) Room 11302	RCS-PL-L133B /+ XXX.XXX	X.XXX	+ XXX.XXX
Fourth-stage ADS Squib Valve	RCS-PL-V004C	East (SG-1) Room 11301	RCS-PL-L137A /+ XXX.XXX	X.XXX	+ XXX.XXX
Fourth-stage ADS Squib Valve	RCS-PL-V004D	West (SG-2) Room 11302	RCS-PL-L137B /+ XXX.XXX	X.XXX	+ XXX.XXX

* Excerpt from COL Appendix C, Table 2.1.2-1

Attachment B

ADS Sparger/IRWST Overflow Measured Elevations (Reference 6)

Component Name**	Tag No.**	IRWST Overflow Elevation	Elevation of Centerline of Connection of Sparger Arms to Sparger Hub	Sparger Hub Centerline Distance Below IRWST Overflow Level
ADS Sparger A	PXS-MW-01A	XXX.X feet	XXX.X feet	XX.X feet
ADS Sparger B	PXS-MW-01B	XXX.X feet	XXX.X feet	XX.X feet

** Excerpt from COL Appendix C, Table 2.1.2-5