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Docket Nos.: 52-025

ND-20-1398
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
ITAAC Closure Notification on Completion of ITAAC E.3.9.08.01.02 [Index Number 871]

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.3.9.08.01.02 [Index Number 871]. This ITAAC confirms that onsite emergency response personnel are mobilized in sufficient number to fill the emergency positions identified in Southern Nuclear Operating Company (SNC) Standard Emergency Plan and the Standard Emergency Plan Annex for VEGP Units 3 and 4. ITAAC E.3.9.08.01.02 also confirms that onsite emergency response personnel successfully perform their assigned responsibilities as outlined in ITAAC E.3.9.08.01.01 [Index Number 870] Acceptance Criterion 8.1.1.D. 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 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 E.3.9.08.01.02 [Index Number 871]

MJY/RLB/sfr

U.S. Nuclear Regulatory Commission

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**Southern Nuclear Operating Company
ND-20-1398
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC E.3.9.08.01.02 [Index Number 871]**

ITAAC Statement

Program Commitment

8.1 The licensee conducts a partial participation exercise to evaluate portions of emergency response capabilities, which includes participation by each State and local agency within the plume exposure EPZ that have not been tested in a previous exercise. [N.1]

Inspections/Tests/Analyses

8.1 A partial participation exercise (test) will be conducted within the specified time periods of 10 CFR Part 50, Appendix E.

Acceptance Criteria

8.1.2 Onsite emergency response personnel are mobilized in sufficient number to fill the emergency positions identified in SNC Standard Emergency Plan, Section B, *Emergency Response Organization*, and Vogtle (Units 3 & 4) Standard Emergency Plan Annex, Section 2, *Organizational Control of Emergencies*, and they successfully perform their assigned responsibilities as outlined in Acceptance Criterion 8.1.1.D, *Emergency Response Facilities*.

ITAAC Determination Basis

Multiple ITAAC are performed to ensure that a partial participation exercise is conducted to evaluate portions of emergency response capabilities, which includes participation by each State and local agency within the plume exposure Emergency Planning Zone (EPZ) that have not been tested in a previous exercise. This ITAAC performed a partial participation exercise (test) within the specified time periods of 10 CFR Part 50, Appendix E and confirmed that onsite emergency response personnel were mobilized in sufficient number to fill the emergency positions identified in the Southern Nuclear Operating Company Standard Emergency Plan (Reference 1), Section B, Emergency Response Organization, and the Standard Emergency Plan Annex for Vogtle Electric Generating Plant Units 3 and 4 (Reference 2), Section 2, Organizational Control of Emergencies. This ITAAC also confirmed that onsite emergency response personnel successfully performed their assigned responsibilities as outlined in Acceptance Criterion 8.1.1.D, Emergency Response Facilities (ITAAC E.3.9.08.01.01 [Index Number 870]).

An exercise scenario, simulating a radiological release to the environment, was developed and conducted using procedure NMP-EP-303 (Reference 3). Scenario-specific onsite exercise objectives were used to evaluate that onsite emergency response personnel were mobilized in sufficient number to fill the emergency positions identified in the Southern Nuclear Operating Company Standard (SNC) Emergency Plan, Section B, Emergency Response Organization, Table 1 (Technical Support Center (TSC) 75 Minute Augmentation Emergency Response Organization ERO), Table 2 (Operations Support Center (OSC) 75 Minute Augmentation ERO), Table 3 (Emergency Operations Facility (EOF) 75 Minute Augmentation ERO) and Table 4 (Joint Information Center (JIC) Staff); and the Standard Emergency Plan Annex for Vogtle Electric Generating Plant Units 3 and 4, Section 2, Organizational Control of Emergencies.

Confirmation that these emergency response personnel successfully performed their assigned responsibilities as outlined in Acceptance Criterion 8.1.1.D, Emergency Response Facilities, is

documented in the September 23, 2020 VEGP Unit 3 NRC Graded Exercise Report (Reference 4) and ITAAC Technical Report (ITR) SV3-ERO-ITR-800871 (Reference 5).

The partial participation exercise performance (test) results are documented in Reference 4 per NMP-EP-303, as supplemented by Reference 5, and confirm that onsite emergency response personnel were mobilized in sufficient number to fill the emergency positions identified in the SNC Standard Emergency Plan, Section B, Emergency Response Organization, and the Vogtle (Units 3 & 4) Standard Emergency Plan Annex, Section 2, Organizational Control of Emergencies. References 4 and 5 also confirm that onsite emergency response personnel performed their assigned responsibilities as outlined in Acceptance Criterion 8.1.1.D, Emergency Response Facilities (ITAAC E.3.9.08.01.01 [Index Number 870]).

References 1 through 5 are available for NRC inspection as part of the Unit 3 E.3.9.08.01.02 ITAAC Completion Package (Reference 6).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company 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.3.9.08.01.02 (Reference 6) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC E.3.9.08.01.02 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. Southern Nuclear Operating Company Standard Emergency Plan, Version 5
2. Southern Nuclear Operating Company Standard Emergency Plan Annex for VEGP Units 3 and 4, Revision 4
3. NMP-EP-303, Drill and Exercise Standards, Version 21.0
4. September 23, 2020 VEGP Unit 3 NRC Graded Exercise Report, 10/1/2020
5. SV3-ERO-ITR-800871, Unit 3 ITAAC 871 9-23-2020 Graded Exercise: ITAAC E.3.9.08.01.02, Revision 0
6. E.3.9.08.01.02-U3-CP-Rev0, ITAAC Completion Package