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Docket No.: 52-026

ND-21-0241
10 CFR 52.99(c)(3)U.S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load
Item 2.2.03.08c.iv.01 [Index Number 183]

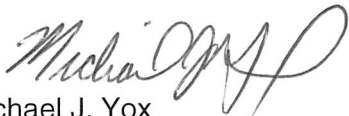
Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of March 10, 2021, Vogtle Electric Generating Plant (VEGP) Unit 4 Uncompleted Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 2.2.03.08c.iv.01 [Index Number 183] has not been completed greater than 225-days prior to initial fuel load. Enclosure 1 describes the plan for completing ITAAC 2.2.03.08c.iv.01 [Index Number 183]. 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 Kelli Roberts 706-848-6991.

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 2.2.03.08c.iv.01 [Index Number 183]

MJY/RMS/sfr

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**Southern Nuclear Operating Company
ND-21-0241
Enclosure 1**

**Vogtle Electric Generating Plant (VEGP) Unit 4
Completion Plan for Uncompleted ITAAC Item 2.2.03.08c.iv.01 [Index No. 183]**

ITAAC Statement

Design Commitment

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

Inspections/Tests/Analyses

- iv) Inspections of the elevation of the following pipe lines will be conducted:

1. IRWST injection lines; IRWST connection to DVI nozzles

- v) Inspections of the elevation of the following tanks will be conducted:

2. IRWST

Acceptance Criteria

- iv) The maximum elevation of the top inside surface of these lines is less than the elevation of:

1. IRWST bottom inside surface

- v) The elevation of the bottom inside tank surface is higher than the direct vessel injection nozzle centerline by the following:

2. IRWST ≥ 3.4 ft

ITAAC Completion Description

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 requires that inspections be conducted to verify that the maximum elevation of the top inside surface of the In-containment Refueling Water Storage Tank (IRWST) injection lines and IRWST connection to Direct Vessel Injection (DVI) nozzles is less than the elevation of IRWST bottom inside surface and that the elevation of the IRWST bottom inside tank surface is higher than the DVI nozzle centerlines by ≥ 3.4 ft.

The inspection of the IRWST injection lines top inside surface, IRWST connection to the DVI nozzles top inside surface, the DVI nozzle centerline, and the IRWST bottom inside tank surface elevations are performed using survey equipment in accordance with site survey and measurement procedure (Reference 1). The conservative wall thickness, derived from installed pipe data, is subtracted from the top-of-pipe survey data to obtain the highest elevation of the inside surface of these lines. The maximum derived elevation of the IRWST injection lines top inside surface, the DVI nozzle centerline, and the IRWST connection to the DVI nozzles top inside surface is compared to the measured elevation of the IRWST bottom inside tank surface using a common reference point.

The inspection results are documented in the Principle Closure Documents (References 2 and 3). Reference 2 determined that the maximum elevation of the top inside surface of the IRWST injection lines and IRWST connection to DVI nozzles is xxx feet and are lower than the xxx foot elevation of the IRWST bottom inside surface. Reference 3 determined that both the DVI nozzle centerline elevations are xxx feet, which are xxx feet below the xxx foot elevation of IRWST bottom inside surface, and therefore both Acceptance Criteria are met.

Principal Closure Documents exist and are available for NRC inspection as well as the ITAAC 2.2.03.08c.iv.01 Completion Package.

List of ITAAC Findings

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.

References (available for NRC inspection)

1. 26139-000-4MP-T81C-N3201 "Construction Survey"
2. SV4-PXS-FSK-xxxxxx Rev x, "As-Built IRWST Injection Lines Top Inside Surface Elevation Comparison to IRWST Bottom Inside Surface"
3. SV4-PXS-MTK-xxxxxx Rev x, "IRWST Bottom Inside Tank Surface Comparison to DVI Nozzle Centerline Elevation"
4. 2.2.03.08c.iv.01-U4-CP-Rev 1, ITAAC Completion Package