

Docket Nos.: 52-026

JUN 16 2021

ND-21-0332
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 4
ITAAC Closure Notification on Completion of ITAAC 2.2.03.08c.iv.03 [Index Number 185]

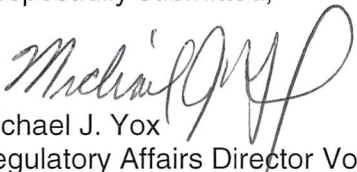
Ladies and Gentlemen:

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 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.03.08c.iv.03 [Index Number 185] for verifying that the maximum elevation of the top inside surface of the Core Makeup Tank (CMT) discharge lines to Direct Vessel Injection (DVI) connection is less than the elevation of the CMT bottom inside surface. 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 Kelli A. Roberts at 706-848-6991.

Respectfully submitted,


Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.2.03.08c.iv.03 [Index Number 185]

MJY/RMS/sfr

To:

Southern Nuclear Operating Company/ Georgia Power Company

Mr. Peter P. Sena III

Mr. D. L. McKinney

Mr. M. D. Meier

Mr. G. Chick

Mr. S. Stimac

Mr. P. Martino

Mr. M. J. Yox

Mr. A. S. Parton

Ms. K. A. Roberts

Mr. C. T. Defnall

Mr. C. E. Morrow

Mr. J. M. Fisher

Mr. R. L. Beilke

Mr. S. Leighty

Ms. A. C. Chamberlain

Mr. J. C. Haswell

Document Services RTYPE: VND.LI.L06

File AR.01.02.06

cc:

Nuclear Regulatory Commission

Ms. M. Bailey

Mr. M. King

Mr. G. Bowman

Ms. A. Veil

Mr. C. P. Patel

Mr. G. J. Khouri

Mr. C. J. Even

Mr. B. J. Kemker

Ms. N. C. Coovert

Mr. C. Welch

Mr. J. Gaslevic

Mr. O. Lopez-Santiago

Mr. G. Armstrong

Mr. M. Webb

Mr. T. Fredette

Mr. C. Santos

Mr. B. Davis

Mr. J. Vasquez

Mr. J. Eargle

Mr. E. Davidson

Mr. T. Fanelli

Ms. K. McCurry

Mr. J. Parent

Mr. B. Griman

Oglethorpe Power Corporation

Mr. R. B. Brinkman
Mr. E. Rasmussen

Municipal Electric Authority of Georgia

Mr. J. E. Fuller
Mr. S. M. Jackson

Dalton Utilities

Mr. T. Bundros

Westinghouse Electric Company, LLC

Dr. L. Oriani
Mr. D. C. Durham
Mr. M. M. Corletti
Mr. Z. S. Harper
Mr. J. L. Coward

Other

Mr. S. W. Kline, *Bechtel Power Corporation*
Ms. L. Matis, *Tetra Tech NUS, Inc.*
Dr. W. R. Jacobs, Jr., Ph.D., *GDS Associates, Inc.*
Mr. S. Roetger, *Georgia Public Service Commission*
Mr. R. L. Trokey, *Georgia Public Service Commission*
Mr. K. C. Greene, *Troutman Sanders*
Mr. S. Blanton, *Balch Bingham*

U.S. Nuclear Regulatory Commission
ND-21-0332 Enclosure
Page 1 of 3

**Southern Nuclear Operating Company
ND-21-0332
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.2.03.08c.iv.03 [Index No. 185]**

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:

3. CMT discharge lines to DVI connection

Acceptance Criteria

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

3. CMT bottom inside surface

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 requires that inspections be conducted to verify that the maximum elevation of the top inside surface of the Core Makeup Tank (CMT) discharge lines to Direct Vessel Injection (DVI) connection is less than the elevation of CMT bottom inside surface.

The inspection of the CMT discharge lines to DVI connection top inside surface and the bottom inside tank surface of both CMTs (SV4-PXS-MT-02A and -02B) elevations was performed using survey equipment in accordance with site survey and measurement procedure (Reference 1). The conservative wall thickness, derived from installed pipe data, was subtracted from the top-of-pipe survey data to obtain the highest elevation of the inside surface of these lines. Additionally, calculations, based upon as-built manufacturer's data, combined with field measurements, were used to determine the elevation of the bottom inside surface of each CMT. The maximum derived elevation of the top inside surface of the CMT discharge lines to DVI connection was compared to the derived elevation of the bottom inside surfaces of each associated CMT using a common reference point.

The inspection results documented in Reference 2, verify that the maximum elevation of the CMT A discharge lines to DVI connection top inside surface is 104.83 feet, the maximum elevation of the CMT B discharge lines to DVI connection top inside surface is 104.84 feet, and the elevation of the CMT bottom inside surface is 107.13 feet and 107.09 feet for CMT A and B, respectively, which meets the ITAAC acceptance criteria.

References 1 and 2 are available for NRC inspection as well as the Unit 4 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 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 2.2.03.08c.iv.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.iv.03 was performed for VEGP Unit 4 and that the prescribed acceptance criteria are 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. 4MP-T81C-N3201 Rev 1, "Construction Survey"
2. SV4-PXS-FSK-800185 Rev 0, "As-Built CMT Discharge Pipe Elevation Comparison to CMT A & B Bottom Inside Surface Elevation"
3. 2.2.03.08c.iv.03-U4-CP-Rev 0, "Completion Package for the Unit 4 ITAAC 2.2.03.08c.iv.03 [Index Number 185]"