



Michael J. Yox
Regulatory Affairs Director
Vogtle 3 & 4

7825 River Road
Waynesboro, GA 30830
706-848-6459 tel

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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.a [Index Number 809]

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 3.3.00.07d.v.a [Index Number 809]. This ITAAC verified for areas inside containment that non-Class 1E wiring which is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is treated as Class 1E wiring.

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 is 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 Roberts at 706-848-6991.

Respectfully submitted,

Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 3.3.00.07d.v.a [Index Number 809]

MJY/CMK/sfr

To:

Southern Nuclear Operating Company/ Georgia Power Company

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Mr. D. L. McKinney
Mr. H. Nieh
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
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Mr. K. J. Drudy
Mr. J. M. Fisher
Mr. R. L. Beilke
Mr. S. Leighty
Ms. A. C. Chamberlain
Mr. J. C. Haswell
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Mr. V. Hall
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Municipal Electric Authority of Georgia
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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*
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**Southern Nuclear Operating Company
ND-21-0288
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3
ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.a [Index Number 809]**

ITAAC Statement

Design Commitment

7.d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

Inspections, Tests, Analyses

Inspections of the as-built raceways that route Class 1E cables will be performed to confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following:

v) Non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is considered as associated circuits and subject to Class 1E requirements.

Acceptance Criteria

Results of the inspection will confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following:

v.a) For areas inside containment, non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is treated as Class 1E wiring.

ITAAC Determination Basis

Multiple ITAAC are performed to ensure that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables. In accordance with this ITAAC, non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance and for which no barrier or analysis is provided is considered as associated circuits and subject to Class 1E requirements. The subject ITAAC requires inspections of the Class 1E and non-Class 1E raceways inside containment to confirm that non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is considered as associated circuits and subject to Class 1E requirements. The Class 1E cables and raceways and non-Class 1E cables inside containment are designed to be appropriately separated in accordance with APP-GW-E1-001 (Reference 1). Installation specifications provided to the constructor identify separation criteria, consistent with the ITAAC commitment.

Class 1E electrical cables and raceways are required to be installed in accordance with design drawings, installation specifications issued for construction, and work package requirements. Completed raceway installation, in-progress and completed cable installation, and completed cable terminations are inspected to ensure the separation installation specifications are satisfied. Inspections are performed in accordance with the Construction Quality Verification Program 26139-000-4MP-T81C-N7101 (Reference 2). ITAAC 3.3.00.07d.ii.a [Index 800] will confirm that inspection records are completed to document the satisfactory separation between

raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables.

Cable Separation Report for Associated Circuits (Reference 3) confirmed that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following:

For areas inside containment, non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is considered as associated circuits and subject to Class 1E requirements.

There are associated circuits in containment at the Incore Instrument Thimble Assembly at the Class 1E Core Exit Thermocouple from the Non-Class 1E Signal Processing System (Reference 4).

The Cable Separation Report for Associated Circuits (Reference 3) is available for NRC inspection as part of the Unit 3 ITAAC 3.3.00.07d.v.a Completion Packages (Reference 5).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings and associated corrective actions. This review found no relevant ITAAC findings associated with this ITAAC.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 3.3.00.07d.v.a was performed for VEGP Unit 3 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. APP-GW-E1-001, "Electrical Systems Design Criteria"
2. 26139-000-4MP-T81C-N7101, "Bechtel Construction Quality Verification Program"
3. SV3-CSR-ITR-800809 Rev 0, "Unit 3 Cable Separation Report for Associated Circuits"
4. APP-GW-E0R-006, "IEEE 384 Design Compliance Description"
5. 3.3.00.07d.v.a-U3-CP-Rev0, ITAAC Completion Package