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Docket No.: 52-025

ND-20-0575  
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 2.7.06.03.i [Index Number 726]

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 2.7.06.03.i [Index Number 726] which verifies fan flow rates, nominal discharge line size, Main Control Room (MCR) controls, and MCR indications for the Containment Air Filtration System (VFS). 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 Roberts at 706-848-6991.

Respectfully submitted,

Jamie M. Coleman  
Regulatory Affairs Director Vogtle 3 & 4Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion of 2.7.06.03.i [Index Number 726]

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**Southern Nuclear Operating Company  
ND-20-0575  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion of ITAAC 2.7.06.03.i [Index Number 726]**

## **ITAAC Statement**

### Design Commitment

3. The VFS provides the intermittent flow of outdoor air to purge the containment atmosphere during normal plant operation, and continuous flow during hot or cold plant shutdown conditions.
4. Controls exist in the MCR to cause the components identified in Table 2.7.6-1 to perform the listed function.
5. Displays of the parameters identified in Table 2.7.6-1 can be retrieved in the MCR.

### Inspections/Tests/Analyses

- i) Testing will be performed to confirm that containment supply AHU fan A when operated with containment exhaust fan A provides a flow of outdoor air.
- ii) Testing will be performed to confirm that containment supply AHU fan B when operated with containment exhaust fan B provides a flow of outdoor air.
- iii) Inspection will be conducted of the containment purge discharge line (VFS-L204) penetrating the containment.

Testing will be performed on the components in Table 2.7.6-1 using controls in the MCR.

Inspection will be performed for retrievability of the parameters in the MCR

### Acceptance Criteria

- i) The flow rate measured at each fan is greater than or equal to 3,600 scfm.
- ii) The flow rate measured at each fan is greater than or equal to 3,600 scfm.
- iii) The nominal line size is  $\geq 36$  in.

Controls in the MCR operate to cause the components listed in Table 2.7.6-1 to perform the listed functions.

The displays identified in Table 2.7.6-1 can be retrieved in the MCR.

## **ITAAC Determination Basis**

Testing and inspections were performed in accordance with Unit 3 preoperational tests, component tests, and implementing work orders as listed in References 1, 2 and 3. The information summarized in the References 1, 2, and 3 confirm the Containment Air Filtration System (VFS) provides the intermittent flow of outdoor air to purge the containment atmosphere during normal plant operation, and continuous flow during hot or cold plant shutdown conditions, that controls exist in the Main Control Room (MCR) to cause the components identified in Combined License (COL) Appendix C Table 2.7.6-1 to perform the listed function, and displays of the parameters identified in COL Appendix C Table 2.7.6-1 can be retrieved in the MCR.

i) The flow rate measured at each fan is greater than or equal to 3,600 scfm

Reference 2 documented testing performed in accordance with Unit 3 preoperational test procedure. The test was conducted by running containment supply fan A (VFS-MA-01A) and containment exhaust fan A (VFS-MA-02A) and measuring airflow for each fan. The measured airflow readings were corrected for instrument accuracy and for standard conditions. The corrected airflow was compared to the acceptance criteria and verified to exceed the minimum flow.

The Unit 3 A containment supply fan produced a minimum flow of 4007 scfm and the Unit 3 A containment exhaust fan produced a minimum flow of 4203 scfm during testing.

The Unit 3 test results in Reference 2 confirm that each VFS A containment supply fan and containment exhaust fan produced a flow rate measured at each fan that is greater than or equal to 3,600 scfm.

ii) The flow rate measured at each fan is greater than or equal to 3,600 scfm.

Reference 2 documented testing performed in accordance with Unit 3 preoperational test procedure. The test was conducted by running containment supply fan B (VFS-MA-01B) and containment exhaust fan B (VFS-MA-02B) and measuring airflow for each fan. The measured airflow readings were corrected for instrument accuracy and for standard conditions. The corrected airflow was compared to the acceptance criteria and verified to exceed the minimum flow.

The Unit 3 B containment supply fan produced a minimum flow of 4139 scfm and the Unit 3 B containment exhaust fan produced a minimum flow of 4133 scfm during testing.

The Unit 3 test results in Reference 2 confirm that each VFS B containment supply fan and containment exhaust fan produced a flow rate measured at each fan that is greater than or equal to 3,600 scfm.

iii) The nominal line size is  $\geq$  36 in.

An inspection was conducted of the containment purge discharge line (VFS-L204) penetrating the containment to verify the containment penetration nominal size is  $\geq$  36 in. The inspection was performed by walking down and visually verifying the containment penetration location and inspecting the Quality Assurance Data Package (QADP). ITAAC Technical Report (ITR) (Reference 1) documents the inspection and the QADP review and documented the line size is 36 inches.

Reference 1 confirms the containment penetration nominal line size is  $\geq$  36 in.

Controls in the MCR operate to cause the components listed in Table 2.7.6-1 to perform the listed functions.

Testing, as summarized in Reference 3, was performed to verify that controls in the MCR operate to cause the components listed in Table 2.7.6-1 (Attachment A) to perform the listed functions.

Testing was conducted at an operator workstation in Unit 3 MCR with the VFS train A and B verified to be in a standby alignment. The containment air handling unit (AHU) supply fan A and containment exhaust fan A were placed in service in accordance with the operating procedure and verified to start and then removed from service in accordance with the operating procedure. This was repeated for the B AHU supply and exhaust fan.

This testing confirmed that controls in the Unit 3 MCR operate to cause the components listed in Table 2.7.6-1 to perform the listed functions.

The displays identified in Table 2.7.6-1 can be retrieved in the MCR.

The inspection, as summarized in Reference 3, was performed to verify that the displays identified in Table 2.7.6-1 (Attachment B) can be retrieved in the MCR.

The component test was conducted in the MCR at the PLS displays and verified the displays in Attachment B could be retrieved in the MCR. Each display in Attachment B was located on the PLS displays and verified to indicate properly.

This confirmed that all the displays identified in Table 2.7.6-1 can be retrieved in Unit 3 MCR.

References 1 through 3 are available for NRC inspection as part of ITAAC 2.7.06.03.i Unit 3 Completion Package (Reference 4).

### **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 2.7.06.03.i (Reference 4) and is available for NRC review.

### **ITAAC Completion Statement**

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.7.06.03.i 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. SV3-VFS-ITR-800726, Rev. 0, "Dimensions of the Containment Purge Discharge Line (VFS-PL-L204)"
2. SV3-VFS-ITR-801726, Rev. 0, "Unit 3 Containment Air Filtration System: ITAAC 2.7.06.03.i Items 3.i and 3.ii
3. SV3-VFS-ITR-802726, Rev. 0, "Unit 3 Containment Air Filtration System: ITAAC 2.7.06.03.i Items 4 and 5
4. 2.7.06.03.i-U3-CP-Rev0, ITAAC Completion Package

**Attachment A**

\*Excerpt from COL Appendix C Table 2.7.6-1

<b>*Equipment</b>	<b>*Tag No.</b>	<b>*Control Function</b>
Containment Air Handling Units (AHU) Supply Fan A	VFS-MA-01A	Start
Containment AHU Supply Fan B	VFS-MA-01B	Start
Containment Exhaust Fan A	VFS-MA-02A	Start
Containment Exhaust Fan B	VFS-MA-02B	Start

**Attachment B**

\* Excerpt from COL Appendix C Table 2.7.6-1

<b>*Equipment</b>	<b>*Tag No.</b>	<b>*Display</b>
Containment Air Handling Units (AHU) Supply Fan A	VFS-MA-01A	Yes (Run Status)
Containment AHU Supply Fan B	VFS-MA-01B	Yes (Run Status)
Containment AHU Supply Fan A Flow Sensor	VFS-012A	Yes
Containment AHU Supply Fan B Flow Sensor	VFS-012B	Yes
Containment Exhaust Fan A	VFS-MA-02A	Yes (Run Status)
Containment Exhaust Fan B	VFS-MA-02B	Yes (Run Status)
Containment Exhaust Fan A Flow Sensor	VFS-011A	Yes
Containment Exhaust Fan B Flow Sensor	VFS-011B	Yes