Southern Nuclear

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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.i [Index Number 799]

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.i [Index Number 799] for verifying that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables within the main control room and remote shutdown room (non-hazard areas). 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 Coleman

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Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 3.3.00.07d.i [Index Number 799]

JMC/CMK/sfr

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Southern Nuclear Operating Company
ND-20-1202
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 3.3.00.07d.i [Index Number 799]

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:

i) Within the main control room and remote shutdown room (non-hazard areas), the minimum separation for low-voltage power cables and below is defined by one of the following:

1) For configurations involving open configurations to enclosed configurations with low-voltage power cables, the minimum vertical separation is 3 inches and the minimum horizontal separation is 1 inch.

2) For configurations involving an enclosed raceway and an open raceway with low-voltage power cables, the minimum vertical separation is 1 inch if the enclosed raceway is below the open raceway.

3) For configurations involving enclosed raceways, the minimum separation is 1 inch in both horizontal and vertical directions.

4) For configurations involving open configurations, and an enclosed raceway and an open raceway, with instrumentation and control cables, the minimum separation is 1 inch in both horizontal and vertical directions.

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:

i) Within the main control room and remote shutdown room (non-hazard areas) the minimum separation for low-voltage power cables and below meets one of the following:

1) For configurations involving open configurations to enclosed configurations with low-voltage power cables, the vertical separation is 3 inches or more and the horizontal separation is 1 inch or more.

2) For configurations that involve an enclosed raceway and an open raceway with low-voltage power cables, the minimum vertical separation may be reduced to 1 inch if the enclosed raceway is below the open raceway.

3) For configurations that involve enclosed raceways, the minimum separation is 1 inch in both horizontal and vertical directions.

4) For configurations that involve open configurations, and an enclosed raceway and an open raceway, with instrumentation and control cables, the minimum separation is 1 inch in both horizontal and vertical directions.

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. This ITAAC requires inspections of the as-built raceways that route Class 1E cables inside the main control room and remote shutdown room to confirm 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 meet the required separation distances. The Class 1E cables and raceways and non-Class 1E cables and raceways inside the main control room and remote shutdown room are designed to be appropriately separated in accordance with APP-GW-E1-001 (Reference 1). Installation specifications provided to the constructor identify the separation criteria, consistent with the ITAAC commitment.

Class 1E electrical cables and raceways are 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). The completed inspection records 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.

Additional inspections were performed and documented in SV3-1200-ITR-MCRRSR (Reference 3) following completion of Class 1E raceway in each room to confirm that separation requirements 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 are met. The Cable Separation Report in Reference 3 identifies the inspections performed and confirms 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:

Within the main control room and remote shutdown room (non-hazard areas) the minimum separation for low-voltage power cables and below meets one of the following:

1) For configurations involving open configurations to enclosed configurations with low-voltage power cables, the vertical separation is 3 inches or more and the horizontal separation is 1 inch or more.

2) For configurations that involve an enclosed raceway and an open raceway with low-voltage power cables, the minimum vertical separation may be reduced to 1 inch if the enclosed raceway is below the open raceway.

3) For configurations that involve enclosed raceways, the minimum separation is 1 inch in both horizontal and vertical directions.

4) For configurations that involve open configurations, and an enclosed raceway and an open raceway, with instrumentation and control cables, the minimum separation is 1 inch in both horizontal and vertical directions.

The Cable Separation Report in Reference 3 is available for NRC inspection as part of the Unit 3 ITAAC 3.3.00.07d.i 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 ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found that there are 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.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. APP-GW-E1-001, Electrical Systems Design Criteria
2. 26139-000-4MP-T81C-N7101, Bechtel Construction Quality Verification Program
3. SV3-1200-ITR-MCRRSR, Unit 3 Cable Separation Report for the Main Control Room and Remote Shutdown Room (non-hazard areas)
4. 3.3.00.07d.i-U3-CP-Rev0, ITAAC Completion Package