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U.S. Nuclear Regulatory Commission  
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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.iii.c[Index Number 805]

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.iii.c [Index Number 805]. This ITAAC verified for the radiologically controlled area of the auxiliary building, where minimum separation distances are not maintained, the circuits are run in enclosed raceways or barriers are provided.

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,

Jamie M. Coleman  
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 ITAAC  
Completion of ITAAC 3.3.00.07d.iii.c[Index Number 805]

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**Southern Nuclear Operating Company  
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Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 ITAAC  
Completion of ITAAC 3.3.00.07d.iii.c[Index Number 805]**

## **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:

iii) Where minimum separation distances are not maintained, the circuits are run in enclosed raceways or barriers are provided.

### 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:

iii.c) Where minimum separation distances are not met inside the radiologically controlled area of the auxiliary building, the circuits are run in enclosed raceways or barriers are provided.

## **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, physical separation for circuits that do not meet the separation distance criteria of ITAAC 3.3.00.07d.ii.c may be provided by enclosed raceways or barriers. For circuits requiring enclosed raceways or barriers, the subject ITAAC requires inspections of the raceways that route Class 1E cables and raceways that route non-Class 1E cables inside the radiologically controlled area of the auxiliary building to confirm that circuits are run in enclosed raceways or have barriers provided. The Class 1E cables and raceways and non-Class 1E cables inside the radiologically controlled area of the auxiliary building 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, raceways, and barriers 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, completed cable terminations, and barriers 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.c [Index Number 802] 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 SV3-CSR-ITR-800805 Rev 0 (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:

Where minimum separation distances are not maintained, inside the radiologically controlled area of the auxiliary building, the circuits are run in enclosed raceways or barriers are provided. There were no circuits that are run in enclosed raceways or barriers to maintain separation distances (Reference 3).

Exceptions to the subject ITAAC are not included within the scope of this ITAAC and are addressed within the scope of ITAAC 3.3.00.07d.iv.c or ITAAC 3.3.00.07d.v.c.

The Cable Separation Report (Reference 3) is available for NRC inspection as part of the Unit 3 ITAAC 3.3.00.07d.iii.c 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 and associated corrective actions. This review found no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 3.3.00.07d.iii.c (Reference 4) and is available for NRC review.

### **ITAAC Completion Statement**

Based on the above information, SNC hereby notifies the NRC that ITAAC 3.3.00.07d.iii.c 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-800805 Rev 0, "Unit 3 Cable Separation Report for the Enclosed Raceways or Barriers for Wiring in the Radiologically Controlled Area of the Auxiliary Building"
4. 3.3.00.07d.iii.c-U3-CP-Rev0, ITAAC Completion Package