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Docket No.: 52-025

ND-22-0464
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 ITAAC 3.3.00.07c.i.b [Index Number 796]

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 3.3.00.07c.i.b [Index Number 796]. This ITAAC verified separation is maintained between Class 1E divisions in accordance with the fire areas as identified in Combined License, Appendix C, Table 3.3-3 in the radiologically controlled area of the auxiliary building. 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" (Reference 1), 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 & 4Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 ITAAC
Completion of ITAAC 3.3.00.07c.i.b [Index Number 796]

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**Southern Nuclear Operating Company
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Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 ITAAC
Completion of ITAAC 3.3.00.07c.i.b [Index Number 796]**

ITAAC Statement

Design Commitment

7.c) Separation is maintained between Class 1E divisions in accordance with the fire areas as identified in Table 3.3-3.

Inspections, Tests, Analyses

i) Inspections of the as-built Class 1E division electrical cables, as-built communication cables associated with only one division, and the as-built raceways that route the Class 1E divisional electrical cables and communication cables located in the fire areas identified in Table 3.3-3 will be conducted.

Acceptance Criteria

i.b) Results of the inspection will confirm that the separation between Class 1E divisions in the radiologically controlled area of the auxiliary building is consistent with Table 3.3-3.

ITAAC Determination Basis

Multiple ITAAC are performed to ensure that separation is maintained between Class 1E divisions in accordance with the fire areas as identified in Table 3.3-3. This ITAAC requires inspections of the as-built Class 1E division electrical cables, as-built communication cables associated with only one division, and the as-built raceways that route the Class 1E divisional electrical cables and communication cables located in the fire areas identified in Table 3.3-3 in the radiologically controlled area of the auxiliary building be conducted to confirm that the separation between Class 1E divisions is consistent with Table 3.3-3. The Class 1E divisions inside the radiologically controlled area of the auxiliary building described in Combined Operating License (COL) Appendix C Table 3.3-3 (Attachment A) 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 division electrical cables, communication cables, and raceways were 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 were inspected to ensure the separation installation specifications are satisfied. Inspections were 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 Class 1E divisions in the radiologically controlled area of the auxiliary building consistent with COL Appendix C Table 3.3-3.

Cable Separation Report (Reference 3) identifies the inspection reports associated with the cable and raceway separation inspections and confirmed that the separation between Class 1E

divisions in the radiologically controlled area of the auxiliary building is consistent with Table 3.3-3.

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 3.3.00.07c.i.b (Reference 4) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 3.3.00.07c.i.b 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. SV3-1200-ITR-AUXRD, Unit 3 Cable Separation Report for the Radiologically Controlled Area of the Auxiliary Building
4. 3.3.00.07c.i.b-U3-CP-Rev0, ITAAC Completion Package

Attachment A

Class 1E Divisions in Auxiliary Building Radiologically Controlled Fire Areas*

Fire Area Number	Class 1E Divisions			
	A	C	B	D
1200 AF 01	Yes	Yes	--	--
1220 AF 02	--	--	--	Yes

Notes:

Note: Dash (--) indicates not applicable

*Excerpt from COL Appendix C Table 3.3-3