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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.ii.c [Index Number 802]

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.ii.c [Index Number 802]. This ITAAC verified that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables 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", 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,

Kelli Roberts for JMC

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.ii.c [Index Number 802]

JMC/CMK/sfr

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Southern Nuclear Operating Company
ND-22-0451
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 ITAAC
Completion of ITAAC 3.3.00.07d.ii.c [Index Number 802]

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:

ii.c) Within other plant areas (limited hazard areas), the minimum separation is defined by one of the following:

1) The minimum vertical separation is 5 feet and the minimum horizontal separation is 3 feet.

2) The minimum vertical separation is 12 inches and the minimum horizontal separation is 6 inches for raceways containing only instrumentation and control and low-voltage power cables ≤ 2/0 AWG. This minimum vertical separation is 3 inches for the configuration with a conduit above and crossing the open tray at an angle equal to or greater than 45 degrees.

3) The minimum vertical separation is 12 inches and the minimum horizontal separation is 6 inches between a conduit and an open configuration for low-voltage power cables greater than 2/0 AWG but not greater than 750 kcmil. The vertical separation is 3 inches if a conduit is above and crossing an open tray at an angle equal to or greater than 45 degrees.

4) For configurations that involve exclusively limited energy content cables (instrumentation and control), the minimum vertical separation is 1 inch and the minimum horizontal separation is 1 inch.

5) 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.

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

7) The minimum vertical separation is 1 inch and the minimum horizontal separation is 1 inch for configurations with a non-safety conduit and a free air safety cable with low-voltage power cables and below.

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:

ii.c) Within other plant areas inside the radiologically controlled area of the auxiliary building (limited hazard areas), the separation meets one of the following:

1) The vertical separation is 5 feet or more and the horizontal separation is 3 feet or more.

2) The minimum vertical separation is 12 inches and the minimum horizontal separation is 6 inches for raceways containing only instrumentation and control and low-voltage power cables ≤ 2/0 AWG. This minimum vertical separation may be reduced to 3 inches for the configuration with a conduit above and crossing the open tray at an angle equal to or greater than 45 degrees.

3) The minimum vertical separation is 12 inches and the minimum horizontal separation is 6 inches between a conduit and an open configuration for low-voltage power cables greater than 2/0 AWG but not greater than 750 kcmil. The vertical separation may be reduced to 3 inches if a conduit is above and crossing an open tray at an angle equal to or greater than 45 degrees.

4) For configurations that involve exclusively limited energy content cables (instrumentation and control), the minimum vertical separation is 1 inch and the minimum horizontal separation is 1 inch.

5) For configurations that involve 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.

6) For configurations that involve enclosed raceways, the minimum vertical and horizontal separation is 1 inch.

7) The minimum vertical separation is 1 inch and the minimum horizontal separation is 1 inch for configurations with a non-safety conduit and a free air safety cable with low-voltage power cables and below.

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 in the radiologically controlled area of the auxiliary building 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 meet the required separation distances. The Class 1E cables and raceways and non-Class 1E cables and raceways 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 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 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 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. 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 other plant areas inside the radiologically controlled area of the auxiliary building (limited hazard areas), the separation meets one of the following:

1) The vertical separation is 5 feet or more and the horizontal separation is 3 feet or more.

2) The minimum vertical separation is 12 inches and the minimum horizontal separation is 6 inches for raceways containing only instrumentation and control and low-voltage power cables ≤ 2/0 AWG. This minimum vertical separation may be reduced to 3 inches for the configuration with a conduit above and crossing the open tray at an angle equal to or greater than 45 degrees.

3) The minimum vertical separation is 12 inches and the minimum horizontal separation is 6 inches between a conduit and an open configuration for low-voltage power cables greater than 2/0 AWG but not greater than 750 kcmil. The vertical separation may be reduced to 3 inches if a conduit is above and crossing an open tray at an angle equal to or greater than 45 degrees.

4) For configurations that involve exclusively limited energy content cables (instrumentation and control), the minimum vertical separation is 1 inch and the minimum horizontal separation is 1 inch.

5) For configurations that involve 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.

6) For configurations that involve enclosed raceways, the minimum vertical and horizontal separation is 1 inch.

7) The minimum vertical separation is 1 inch and the minimum horizontal separation is 1 inch for configurations with a non-safety conduit and a free air safety cable with low-voltage power cables and below.

The Cable Separation Report (Reference 3) is available for NRC inspection as part of the Unit 3 ITAAC 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 3.3.00.07d.ii.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.ii.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 System 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. 3.3.00.07d.ii.c-U3-CP-Rev0, ITAAC Completion Package