

September 2, 2022

Docket No.: 52-026

ND-22-0707
10 CFR 52.99(c)(1)

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
ITAAC Closure Notification on Completion of ITAAC 3.3.00.07e [Index Number 812]

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 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) item 3.3.00.07e [Index Number 812]. This ITAAC verifies that Class 1E communication cables which interconnect two divisions are routed and separated such that Protection and Safety Monitoring System voting logic is not defeated by the loss of any single raceway or fire area. 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 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of 3.3.00.07e [Index Number 812]

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cc: Regional Administrator, Region II
Director, Office of Nuclear Reactor Regulation (NRR)
Director, Vogtle Project Office NRR
Senior Resident Inspector – Vogtle 3 & 4

**Southern Nuclear Operating Company
ND-22-0707
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of 3.3.00.07e [Index Number 812]**

ITAAC Statement

Design Commitment

7.e) Class 1E communication cables which interconnect two divisions are routed and separated such that the Protection and Safety Monitoring System voting logic is not defeated by the loss of any single raceway or fire area.

Inspections, Tests, Analyses

Inspections of the as-built Class 1E communication cables will be conducted.

Acceptance Criteria

Class 1E communication cables which interconnect two divisions are routed and separated such that the Protection and Safety Monitoring System voting logic is not defeated by the loss of any single raceway or fire area.

ITAAC Determination Basis

Inspections of the as-built Class 1E communication cables which interconnect two divisions have been conducted to confirm that Class 1E communication cables which interconnect two divisions have been routed and separated such that the Protection and Safety Monitoring System (PMS) voting logic is not defeated by the loss of any single raceway or fire area.

For each PMS actuation, a PMS division generates a reactor trip and/or Engineered Safeguards Features (ESF) trip signal for that division if the required number of divisional signals meet the voting logic necessary for a trip. The Class 1E communication cables which interconnect two divisions are designed to be appropriately routed and separated such that the loss of any single raceway or fire area will not defeat the voting logic for any reactor trip and/or ESF function.

An analysis was performed and documented in the Unit 4 Cable Separation Report (Reference 1) which analyzed the impact of the loss of any single raceway or fire area which contains Class 1E communication cables. The analysis considered the interconnection of the PMS divisions on each reactor trip and ESF function voting logic combination. The analysis confirmed that the Class 1E communication cables which interconnect PMS divisions were designed to be routed and separated such that the PMS voting logic is not defeated by the loss of any single raceway or fire area.

The as-built Class 1E communication cables have been verified 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, and completed cable terminations were inspected to ensure the separation installation specifications are satisfied. Inspections have been performed in accordance with the *Construction Quality Verification Program*, document 26139-000-4MP-T81C-N7101 (Reference 2). The completed inspection records document the satisfactory routing and separation between Class 1E communication cables which interconnect two divisions.

The Unit 4 Cable Separation Report identifies the cable and raceway segments used to confirm that the PMS voting logic has been installed per design documents. Inspections records can be

identified by cable number. A sample verification of inspection records was performed by ITAAC personnel to ensure inspection records accuracy. Class 1E communication cables which interconnect two divisions have been routed and separated such that the Protection and Safety Monitoring System voting logic is not defeated by the loss of any single raceway or fire area.

The Unit 4 Cable Separation Report is available for NRC inspection as part of Unit 4 3.3.00.07e Completion Package (Reference 3).

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 3.3.00.07e was performed for VEGP Unit 4 and that the prescribed acceptance criteria were met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-built, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. SV4-CSR-ITR-800812 Rev 0, Unit 4 Cable Separation Report for PMS As-Built Class 1E Routing and Separation
2. 26139-000-4MP-T81C-N7101, Construction Quality Verification Program
3. 3.3.00.07e-U4-CP-Rev0, ITAAC Completion Package