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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
ITAAC Closure Notification on Completion of ITAAC 2.3.08.02.iii [Index Number 417]

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 2.3.08.02.iii [Index Number 417], for verifying the Service Water System (SWS) tower basin volume. 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,

A handwritten signature in black ink that reads "Jamie Coleman".

Jamie M. Coleman
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4 ITAAC
Completion of ITAAC 2.3.08.02.iii [Index Number 417]

JMC/DLW/sfr

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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

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**Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.3.08.02.iii [Index Number 417]**

ITAAC Statement

Design Commitment

2. The SWS provides the nonsafety-related function of transferring heat from the component cooling water system to the surrounding atmosphere to support plant shutdown and spent fuel pool cooling.

Inspections/Tests/Analyses

iii) Testing will be performed to confirm that the SWS cooling tower basin has adequate reserve volume.

Acceptance Criteria

iii) The SWS tower basin contains a usable volume of at least 230,000 gallons at the basin low level alarm setpoint.

ITAAC Determination Basis

Multiple ITAAC are performed to verify that the Service Water System (SWS) provides the nonsafety-related function of transferring heat from the Component Cooling Water System (CCS) to the surrounding atmosphere to support plant shutdown and spent fuel pool cooling. The subject ITAAC requires testing be performed to confirm that the SWS cooling tower basin contains useable volume of at least 230,000 gallons at the basin low level alarm setpoint.

This ICN differs from the UIN due to a design change that was incorporated into the SWS cooling tower basin instrumentation. The low-2 condition was changed from being the low level alarm to being a warning that the low level is being approached. The new low level condition is the low-3 alarm and the low-1 condition remained unchanged. Low-3 is equivalent to Low-2 described in the UIN.

Testing was performed in accordance with Unit 4 preoperational test procedure 4-SWS-ITPP-501 (Reference 1), contained in Reference 2, and confirmed that the SWS pumps will operate to provide required flow and pressure at the low-3 alarm setpoint in the SWS cooling tower basin. The usable volume is defined as the volume contained between the low level alarm setpoint (low-1) and the lowest usable level alarm setpoint (low-3). As part of the test procedure, the as-built dimensions of the basin and all structural components that reduce the useable volume were measured. The as-built dimensions along with the appropriate measurement uncertainty were used to determine the basin volume.

The preoperational test (Reference 2) was performed and ensured the SWS was in a normal system alignment with the cooling tower basin divider open and makeup water isolated. The cooling tower basin level was lowered to the low-3 setpoint and both SWS pumps were verified to provide the proper pressure and flow. The usable volume of the basin was calculated by measuring the as-built dimensions of the basin between the low-1 and low-3 setpoints and subtracting the as-built volume of the structural components inside the basin (Reference 3). The results of the volume calculation and the SWS pump testing demonstrated the Unit 4 SWS cooling tower basin contains 249,251 usable gallons at the low-1 setpoint.

References 1 through 3 confirmed that the SWS cooling tower basin contains a usable volume of at least 230,000 gallons at the basin low level alarm setpoint.

References 1 through 3 are available for NRC inspection as well as Unit 4 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 were no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.3.08.02.iii (Reference 4) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.3.08.02.iii 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-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. 4-SWS-ITPP-501, Rev 0, "Service Water System Preoperational Test"
2. SV4-SWS-T0W-1206770, Rev. 0, "(ITAAC) 4-SWS-ITPP-501 Preoperational Test"
3. SV4-SWS-ITR-800417, Rev. 0, "Unit 4 Service Water System (SWS) Tower Basin ITAAC Volume"
4. 2.3.08.02.iii-U4-CP-Rev0, ITAAC Completion Package