

December 22, 2022

Docket No.: 52-026

ND-22-0965
10 CFR 52.99(c)(3)

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

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
Resubmittal of Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load
Item 3.3.00.07d.ii.b [Index Number 801]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company (SNC) hereby notifies the NRC that as of December 22, 2022, Vogtle Electric Generating Plant (VEGP) Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 3.3.00.07d.ii.b [Index Number 801] has not been completed.

SNC previously submitted Notices of Uncompleted ITAAC 225-days Prior to Initial Fuel Load for Items 3.3.00.07d.ii.b, 3.3.00.07d.iii.b, 3.3.00.07d.iv.b, 3.3.00.07d.v.b [Index Numbers 801, 804, 807, 810] ND-18-0814 [ML18194A697, ML18194A698, ML18194A699, ML18194A700], dated July 11, 2018; for Item 3.3.00.07ab [Index Number 790], ND-19-1270 [ML19291D036], dated October 18, 2019; and Item 3.3.00.07bb [Index Number 793] ND-18-0445 [ML18095A079], dated April 4, 2018. This resubmittal addresses changes made to ITAAC by Amendment 187 to the VEGP Unit 4 Combined License and supersedes ND-18-0814, ND-19-1270, and ND-18-0445 in their entirety for Unit 4.

This notification is informed by 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. In accordance with NEI 08-01, this notification includes ITAAC for which required inspections, tests, or analyses have not been performed or have been only partially completed. All ITAAC will be fully completed and all Section 52.99(c)(1) ITAAC Closure Notifications will be submitted to NRC to support the Commission finding that all acceptance criteria are met prior to plant operation, as required by 10 CFR 52.103(g).

This letter contains no new NRC regulatory commitments.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,

Handwritten signature of Kelly Roberts for JMC. The signature is written in black ink and includes the name "Kelly Roberts" followed by "for JMC".

Jamie M. Coleman
Regulatory Affairs Director Vogtle 3 & 4

Enclosure 1: Vogtle Electric Generating Plant (VEGP) Unit 4
Completion Plan for Uncompleted ITAAC 3.3.00.07d.ii.b [Index Number 801]

JMC/CSS/sfr

U.S. Nuclear Regulatory Commission
ND-22-0965
Page 3 of 3

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-22-0965
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 4
Completion Plan for Uncompleted ITAAC 3.3.00.07d.ii.b [Index Number 801]**

ITAAC Statement

Design Commitment:

7.d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

7.a) Class 1E electrical cables, communication cables associated with only one division, and raceways that route the Class 1E electrical cables and the communication cables are identified according to applicable color-coded Class 1E divisions.

7.b) Class 1E divisional electrical cables and communication cables associated with only one division are routed in their respective divisional raceways.

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.b) 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 $\leq 2/0$ 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.

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

iv) Separation distances less than those specified above and not run in enclosed raceways or provided with barriers are based on analysis.

v) Non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is considered as associated circuits and subject to Class 1E requirements.

Inspections of the as-built Class 1E cables and the as-built raceways that route the Class 1E cables will be conducted.

Inspections of the as-built Class 1E divisional cables and the as-built raceways that route the Class 1E cables will be conducted.

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.b) Within other plant areas inside the non-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 $\leq 2/0$ 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.

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

iv.b) For areas inside the non-radiologically controlled area of the auxiliary building, a report exists and concludes that separation distances less than those specified above and not provided with enclosed raceways or barriers have been analyzed.

v.b) For areas inside the non-radiologically controlled area of the auxiliary building, non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is treated as Class 1E wiring.

b) Class 1E electrical cables, and communication cables associated with only one division, and the raceways that route these cables in the non-radiologically controlled area of the auxiliary building are identified by the appropriate color code.

b) Class 1E electrical cables and communication cables in the non-radiologically controlled area of the auxiliary building associated with only one division are routed in raceways assigned to the same division. There are no other safety division electrical cables in a raceway assigned to a different division.

ITAAC Completion Description

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,
- Class 1E electrical cables, communication cables associated with only one division, and raceways that route the Class 1E electrical cables and the communication cables are identified according to applicable color-coded Class 1E divisions, and
- Class 1E divisional electrical cables and communication cables associated with only one division are routed in their respective divisional raceways.

This ITAAC requires inspections of the Class 1E cables and as-built raceways that route Class 1E cables inside the non-radiologically controlled area of the auxiliary building to confirm that:

- Physical 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 specified separation criteria,
- Cables and raceways associated with only one division are identified by the appropriate color code, and

- Divisional cables are routed in raceways assigned to the same division and that there are no other safety division electrical cables in a raceway assigned to a different division.

Class 1E cables, raceways that route Class 1E cables and non-Class 1E cables, and barriers are all designed to meet the specified Acceptance Criteria in accordance with APP-GW-E1-001 (Reference 1). Class 1E electrical cables, raceways that route Class 1E cables and non-Class 1E cables, and barriers are 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 completed barriers are inspected to ensure the installation specifications are satisfied. Inspections are performed in accordance with the Quality Verification Program 26139-000-4MP-T81C-N7101 (Reference 2), or the Quality Control Inspection Program, ND-EN-VNP-020 (Reference 3). 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,
- The satisfactory color coding of the Class 1E electrical cables, communication cables associated with only one division, and raceways, and
- The satisfactory routing of the Class 1E electrical cables and communication cables associated with only one division in raceways assigned to the same division and that there are no other safety division electrical cables in a raceway assigned to a different division.

The ITAAC Technical Report (Reference 4) identifies the inspections performed and confirms the following:

- 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 non-radiologically controlled area of the auxiliary building (limited hazard areas), the separation meets one of acceptance criteria ii.b.1 through ii.b.7.
 - Where minimum separation distances are not met inside the non-radiologically controlled area of the auxiliary building, the circuits are run in enclosed raceways or barriers are provided.
 - For areas inside the non-radiologically controlled area of the auxiliary building, a report exists and concludes that separation distances less than those specified above and not provided with enclosed raceways or barriers have been analyzed.
 - Analyses performed in accordance with standard IEEE 384-1981 are documented in References 5 through 7 which demonstrate acceptability of lesser separation distances. These reports specifically conclude the following instances of lesser separation distances do not impact the ability of Class 1E circuits to perform their safety related functions: Fiber Optic Linear Heat Detection Cables, PMS interdivisional cables, rod drive power system cables, leaky coax cables, Service Level Z Instrumentation Cables, and allowances

based on service level, configuration, and fault vs. target circuit classification (Class 1E vs. non-Class 1E).

- For areas inside the non-radiologically controlled area of the auxiliary building, non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is treated as Class 1E wiring.
 - As documented in Reference 5, the following associated circuits are installed in this area: Main Control Room at the lighting cables from double fuse panels SV4-IDSB-EA-5 and SV4-IDSC-EA-5 to dimmer switches SV4-ELS-EL-SB31 and SV4-ELS-EL-SC31 and all downstream lighting fixtures.
- Class 1E electrical cables, and communication cables associated with only one division, and the raceways that route these cables in the non-radiologically controlled area of the auxiliary building are identified by the appropriate color code.
- Class 1E electrical cables and communication cables in the non-radiologically controlled area of the auxiliary building associated with only one division are routed in raceways assigned to the same division. There are no other safety division electrical cables in a raceway assigned to a different division.

References 4 through 7 are available for NRC inspection as part of the Unit 4 ITAAC 3.3.00.07d.ii.b Completion Package (Reference 8).

List of ITAAC Findings

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.

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. ND-EN-VNP-020, Quality Control Inspection Program
4. SV4-1200-ITR-800801, "Unit 4 Aux Non-Rad Electrical Report for ITAAC 801"
5. APP-GW-E0R-006, "IEEE 384 Design Compliance Description"
6. APP-FSAR-GEF-234, "Update IEEE 384-1981 Exceptions for Revised Cable and Raceway Minimum Separation Distances (NL-1491)"
7. APP-G1-GEF-850217, "Leaky Coax Cable IEEE 384 Separation Evaluation"
8. 3.3.00.07d.ii.b-U4-CP-Rev0, ITAAC Completion Package