Southern Nuclear

Jamie M. Coleman
Regulatory Affairs Director
Vogtle 3 & 4

7825 River Road
Waynesboro, GA 30830
706-848-6926 tel

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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
ITAAC Closure Notification on Completion of 2.3.04.04.ii [Index Number 331]

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 2.3.04.04.ii [Index Number 331] for verifying the flow rate from the two highest fire-hose stations when aligned to the Passive Containment Cooling Water Storage Tank (PCCWST) is not less than 75 gallons per minute (gpm). 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 Coleman

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Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.3.04.04.ii [Index Number 331]

JMC/MKO/sfr

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

Southern Nuclear Operating Company
ND-23-0437
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.3.04.04.ii [Index Number 331]

ITAAC Statement

Design Commitment

4. The FPS provides for manual fire fighting capability in plant areas containing safety-related equipment.

Inspections/Tests/Analyses

ii) Testing will be performed by measuring the water flow rate as it is simultaneously discharged from the two highest fire-hose stations and when the water for the fire is supplied from the PCS storage tank.

Acceptance Criteria

ii) Water is simultaneously discharged from each of the two highest fire-hose stations in plant areas containing safety-related equipment at not less than 75 gpm.

ITAAC Determination Basis

Multiple ITAAC are performed to demonstrate the Fire Protection System (FPS) provides for manual fire fighting capability in plant areas containing safety-related equipment. This ITAAC performed testing by measuring the water flow rate as it was simultaneously discharged from the two highest fire-hose stations when the water for the fire system was supplied from the Passive Containment Cooling System (PCS) storage tank.

Testing was performed as documented in Reference 1 using instruction in the Unit 4 preoperational test to confirm that when the water for the FPS was supplied from the PCS storage tank, water was simultaneously discharged from each of the two highest fire-hose stations in plant areas containing safety-related equipment at not less than 75 gallons per minute (gpm). The 2 highest fire-hose stations in plant areas containing safety-related equipment was determined to be F151A (room 12506) and F151B (room 12504). The flow measurement was performed at a level above the Primary Containment Cooling Water Storage Tank (PCCWST) technical specification minimum since the level in the tank will have negligible impact on gravity flow. There is a 1.1 foot elevation difference between the maximum PCCWST level and the technical specification minimum and a 187 foot elevation difference between the maximum PCCWST level and the highest fire-hose stations. The fire protection system was aligned to isolate the normal fire protection from the tested fire hose stations and the PCS storage tank was aligned to provide water to the fire-hose stations being tested. Ultrasonic flow instruments were installed upstream of the fire-hose stations and the fire hose was run and secured to a suitable drain. The fire-hose station isolation valves were opened, flow was monitored at each flow instrument and recorded approximately every 10 seconds and 30 readings were taken. The flow readings were corrected for measurement uncertainty and compared to the acceptance criteria. The flow for Unit 4 F151A was 113.1 gpm and 104.8 gpm for Unit 4 F151B. The completed test results, contained in Reference 1, confirm that water was simultaneously discharged from each of the two highest fire-hose stations in plant areas containing safety-related equipment at not less than 75 gpm.

Reference 1 is available for NRC inspection as part of the ITAAC 2.3.04.04.ii Completion Package (Reference 2).

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 there are no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.3.04.04.ii (Reference 2) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.3.04.04.ii 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. SV4-FPS-ITR-800331, Rev 0, “Unit 4 Recorded Results of PCS Storage Tank Discharge to Two Highest Fire-Hose Stations: ITAAC 2.3.04.04.ii”
2. 2.3.04.04.ii-U4-CP-Rev0, ITAAC Completion Package