

July 20, 2023

Docket No.: 52-026

ND-23-0618
10 CFR 52.99(c)(1)

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 ITAAC Closure Notification on Completion of ITAAC Item 3.3.00.07c.ii.a [Index
Number 797]

Ladies and Gentlemen:

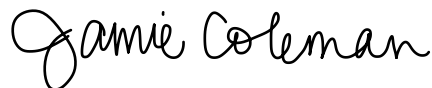
In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 3.3.00.07c.ii.a [Index Number 797]. This ITAAC confirms that fire barriers exist between fire areas identified in Table 3.3-3 inside the non-radiologically controlled area of the auxiliary building. The closure process for this ITAAC is based on the guidance described in Nuclear Energy Institute (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.

Southern Nuclear Operating Company (SNC) previously submitted ITAAC Closure Notification on Completion of ITAAC 3.3.00.07c.ii.a [Index Number 797], letter number ND-23-0484, dated June 24, 2023 [ML23175A006]. This resubmittal addresses changes to the Principal Closure Document (Reference 3 in the enclosure) and supercedes ND-23-0484 in its entirety.

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 ITAAC Item 3.3.00.07c.ii.a [Index Number 797]

JMC/CSS/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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**Southern Nuclear Operating Company
ND-23-0618
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 4
Resubmittal of Completion of ITAAC Item 3.3.00.07c.ii.a [Index Number 797]**

ITAAC Statement

Design Commitment

7.c) Separation is maintained between Class 1E divisions in accordance with the fire areas as identified in Table 3.3-3.

Inspections/Tests/Analyses

ii) Inspections of the as-built fire barriers between the fire areas identified in Table 3.3-3 will be conducted.

Acceptance Criteria

ii.a) Results of the inspection will confirm that fire barriers exist between fire areas identified in Table 3.3-3 inside the non-radiologically controlled area of the auxiliary building.

ITAAC Determination Basis

Multiple ITAAC are performed to demonstrate that separation is maintained between Class 1E divisions in accordance with the fire areas as identified in Table 3.3-3. The subject ITAAC requires inspections to be conducted of the as-built fire barriers between the fire areas identified in Table 3.3-3. The Class 1E divisions in Nuclear Island Fire Areas are described in Combined Operating License (COL) Appendix C Table 3.3-3 (Attachment A). The fire barriers between fire areas identified in Table 3.3-3 inside the non-radiologically controlled area of the auxiliary building were designed in accordance with APP-GW-E1-001 (Reference 1). Installation specifications provided to the constructor identified the fire barriers, consistent with the ITAAC commitment.

Fire barriers between the fire areas identified in the table were installed in accordance with design drawings, installation specifications issued for construction, and work package requirements. Completed fire barriers were inspected to ensure the fire barrier criteria in the installation specifications were satisfied. Inspections were performed in accordance with the Construction Quality Verification Program 26139-000-4MP-T81C-N7101 (Reference 2) and other plant procedures as documented in Reference 3. The completed inspection records document that satisfactory fire barriers exist between fire areas identified in the table inside the non-radiologically controlled area of the auxiliary building.

The Fire Barrier Inspection Report (Reference 3) identifies the inspection reports associated with the fire barrier inspections and confirmed that fire barriers exist between fire areas identified in Table 3.3-3 inside the non-radiologically controlled area of the auxiliary building.

The Fire Barrier Inspection Report is available for NRC inspection as part of the 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 that one such finding, listed below, has been identified:

- Errors were identified in the original principal closure document, including spare penetrations for which inspections were not documented prior to submittal. To address these concerns, all errors were corrected and inspections were performed of these spare penetrations and documented in Reference 3.

The corrective actions for this finding have been completed. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 3.3.00.07c.ii.a (Reference 4) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 3.3.00.07c.ii.a 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. APP-GW-E1-001 (SV4-GW-E1-001), Rev. 4 Electrical Systems Design Criteria
2. 26139-000-4MP-T81C-N7101 Rev. 11, BECHTEL CONSTRUCTION QUALITY VERIFICATION PROGRAM
3. SV4-1200-ITR-800797 R1, Fire Barrier Inspection Report, Unit 4: ITAAC 3.3.00.07c.ii.a (Aux Bldg Non-Rad Area Fire Barriers) NRC Index Number 797
4. 3.3.00.07c.ii.a-U4-CP-Rev1, ITAAC Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

Class 1E Divisions in Nuclear Island Fire Areas*

Fire Area Number
Auxiliary Building Non-Radiologically Controlled
1200 AF 03
1201 AF 02
1201 AF 03
1201 AF 04
1201 AF 05
1201 AF 06
1202 AF 03
1202 AF 04
1220 AF 01
1230 AF 01
1230 AF 02
1240 AF 01
1242 AF 02
1250 AF 01

Notes:

*Excerpt from COL Appendix C Table 3.3-3