



Jamie M. Coleman  
Regulatory Affairs Director  
Vogtle 3 & 4

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

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U.S. Nuclear Regulatory Commission  
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Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Unit 3  
ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.b [Index Number 804]

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 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 3.3.00.07d.iii.b [Index Number 804]. This ITAAC verified that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables inside the non-radiologically controlled area of the auxiliary building. 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,

Jamie M. Coleman  
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion of ITAAC 3.3.00.07d.iii.b [Index Number 804]

JMC/CMK/sfr

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**Southern Nuclear Operating Company/ Georgia Power Company**

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Mr. H. Nieh

Mr. G. Chick

Mr. S. Stimac

Mr. P. Martino

Mr. D. Pitts

Mr. J.B. Williams

Mr. A. S. Parton

Ms. K. A. Roberts

Ms. J.M. Coleman

Mr. C. T. Defnall

Mr. C. E. Morrow

Mr. K. J. Drudy

Mr. J. M. Fisher

Mr. R. L. Beilke

Mr. S. Leighty

Ms. A. C. Chamberlain

Mr. J. C. Haswell

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**Municipal Electric Authority of Georgia**

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**Westinghouse Electric Company, LLC**

Dr. L. Oriani  
Mr. D. C. Durham  
Mr. M. M. Corletti  
Mr. Z. S. Harper  
Ms. S.L. Zwack

**Other**

Mr. S. W. Kline, *Bechtel Power Corporation*  
Ms. L. Matis, *Tetra Tech NUS, Inc.*  
Dr. W. R. Jacobs, Jr., Ph.D., *GDS Associates, Inc.*  
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**Southern Nuclear Operating Company  
ND-21-0296  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion of ITAAC 3.3.00.07d.iii.b [Index Number 804]**

## **ITAAC Statement**

### Design Commitment

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

### 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:

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

### 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:

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.

## **ITAAC Determination Basis**

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. In accordance with this ITAAC, physical separation for circuits that do not meet the separation distance criteria of ITAAC 3.3.00.07d.ii.b may be provided by enclosed raceways or barriers. For circuits requiring enclosed raceways or barriers, the subject ITAAC requires inspections of the raceways that route Class 1E cables and raceways that route non-Class 1E cables inside the non-radiologically controlled area of the auxiliary building to confirm that circuits are run in enclosed raceways or have barriers provided. The Class 1E cables and raceways and non-Class 1E cables inside the non-radiologically controlled area of the auxiliary building are designed to be appropriately separated in accordance with APP-GW-E1-001 (Reference 1). Installation specifications provided to the constructor identify the separation criteria, consistent with the ITAAC commitment.

Class 1E electrical cables, raceways, and barriers were 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 barriers were inspected to ensure the separation installation specifications are satisfied. Inspections were performed in accordance with the Construction Quality Verification Program, 26139-000-4MP-T81C-N7101 (Reference 2), or the Quality Control Inspection Program, ND-EN-VNP-020 (Reference 5). 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.

Additional inspections were performed and documented following completion of Class 1E raceway in each room to confirm that separation requirements 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 are met. Reference 3 identifies the inspections performed and confirms 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:

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

Exceptions to the subject ITAAC are not included within the scope of this ITAAC and are addressed within the scope of ITAAC 3.3.00.07d.iv.b or ITAAC 3.3.00.07d.v.b.

The Cable Separation Report (Reference 3) is available for NRC inspection as part of the Unit 3 ITAAC 3.3.00.07d.iii.b 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 ITAAC findings and associated corrective actions. This review found no relevant ITAAC findings associated with this ITAAC and is documented in Reference 4.

#### **ITAAC Completion Statement**

Based on the above information, SNC hereby notifies the NRC that ITAAC 3.3.00.07d.iii.b was performed for VEGP Unit 3 and that the prescribed acceptance criteria are 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, Electrical Systems Design Criteria
2. 26139-000-4MP-T81C-N7101, Construction Quality Verification Program
3. SV3-1200-ITR-AUXNRD, Unit 3 Cable Separation Report for the Non-Radiologically Controlled Area of the Auxiliary Building
4. 3.3.00.07d.iii.b-U3-CP-Rev0, ITAAC Completion Package
5. ND-EN-VNP-020, Quality Control Inspection Program