

UNITED STATES NUCLEAR REGULATORY COMMISSION

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December 09, 2021

MEMORANDUM TO: Gregory Bowman, Director

Vogtle Project Office

Office of Nuclear Reactor Regulation

Marissa G. Bailey, Director

Division of Construction Oversight

Region II

FROM: Victor E. Hall, Chief /RA/

Vogtle Project Office

Office of Nuclear Reactor Regulation

SUBJECT: UPDATE TO TARGETED INSPECTIONS, TESTS, ANALYSES,

ANDACCEPTANCE CRITERIA FOR VOGTLE ELECTRIC

GENERATING PLANT UNITS 3 AND 4

This memorandum updates the list of Inspections, Tests, Analyses and Acceptance Criteria (ITAAC) targeted for inspection by the U.S. Nuclear Regulatory Commission (NRC) under the baseline inspection program for Vogtle Electric Generating Plant (VEGP), Units 3 and 4. The updates to ITAAC targeting incorporate the latest license amendments for VEGP, Units 3 and 4, through license amendments 188 and 186, respectively.

This update reflects deletion of ITAAC index No. 68, consolidation of ITAAC No. 586 into ITAAC No. 622, and revisions to targeted ITAAC Nos. 75, 138, 35, 50, 175, and 819. Additionally, this memorandum reflects revisions to non-targeted ITAAC Nos. 515, 565, and 570. This update does not change the status of any targeted ITAAC and does not impact planned inspection activities.

The Vogtle Project Office is making these changes based upon the input from its expert panel, convened on October 25, 2021. The panel examined license amendments 172 through 188 for Unit 3, and 170 through 186 for Unit 4. Christopher Welch presented the ITAAC changes to the expert panel, which included James Gaslevic, Michael Webb, and Tanny Santos.

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The following table provides a status of changes to the ITAAC in Appendix C for each combined license, from initial license issuance through the current license amendment:

APPENDIX C	Vogtle Unit 3	Vogtle Unit 4
License Amendment No.	188	186
Initial ITAAC Entries	875	875
ITAAC Entries Added	6	7*
Total ITAAC Entries	881	881
ITAAC Entries Deleted	483	488
ITAAC Entries Active**	398	393
Total ITAAC Activities	743	738
Targeted ITAAC Activities	276	272
Percent of ITAAC Activities Targeted	37%	37%

^{*} License Amendment 158 reused ITAAC entry 852.

The ITAAC matrix groups each ITAAC "activity," into a unique ITAAC family that best represents the ITAAC's specific construction activities. An ITAAC "activity" consists of an inspection, test, and or analysis and unique acceptance criteria. The ITAAC in the Design Control Document were broken into individual line items and assigned a unique ITAAC index number, so each individual ITAAC activity could be assigned into a single ITAAC family.

Changes to the license, such as for ITAAC consolidation, do not impact the placement of ITAAC activities into the ITAAC matrix or their families. These changes also do not impact the outcome of the prioritization process and selection for inspection (i.e., targeting).

Attachment 1 lists the ITAAC activities sequentially by ITAAC index number and provides the official list of targeted ITAAC and their assigned ITAAC families. The NRC performs the baseline construction inspection program using this list. Attachment 2 lists the ITAAC by family. The NRC will continue to inspect ITAAC activities using the inspection procedures related to the family designator as shown in Attachments 1 and 2, as the baseline inspection requirement. The NRC inspection program credits previous inspections and findings for the pre-consolidated ITAAC under the consolidated ITAAC.

The NRC tracks ITAAC completion using the Construction Inspection Program Information Management System (CIPIMS). This software is limited to one family designator and one inspection status (i.e., targeted or non-targeted) for each ITAAC entry, versus ITAAC activity. This limitation does not support ITAAC consolidation, as the software was designed for having a single ITAAC entry (i.e., index number) match a single ITAAC activity. With consolidation, a single index number may now have several ITAAC activities, each originally with its own family designator and targeted status. The staff modified CIPIMS so that the original ITAAC family is applied to all the consolidated activities for new consolidated ITAAC. Similarly, CIPIMS shows a consolidated ITAAC as targeted if any of its ITAAC activities are targeted. As a result, the ITAAC data in CIPIMS is not always consistent with the "official" family assignments and targeted status for each of the specific ITAAC activities identified in the attachments.

Attachments:

- 1. Targeted ITAAC Listing VEGP Units 3 and 4, dated November 2, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21342A304)
- 2. ITAAC Family Listing VEGP Units 3 and 4, dated November 2, 2021 (ADAMS Accession No. ML21342A305)

^{**} An ITAAC entry may have one or more discrete ITAAC activities.

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SUBJECT: UPDATE TO THE "TARGETED" ITAAC FOR VOGTLE ELECTRIC GENERATING PLANT UNITS 3 and 4 DATED: DECEMBER 9, 2021

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