

Southern Nuclear
Operating Company, Inc.
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Docket Nos.: 52-025
52-026

ND-11-1670

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

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4 Combined License Application
SNC Review of VEGP Units 3 and 4 Final Safety Evaluation Report

Ladies and Gentlemen:

The purpose of this letter is to provide a response to the requested review identified in the NRC letter of August 5, 2011 (ADAMS ML111950510). Southern Nuclear Operating Company (SNC) appreciates the opportunity to review the Final Safety Evaluation Report (FSER) attached to the NRC letter in advance of its release to the public for the purpose of determining whether any portion of the document should be exempt from public disclosure or if any factual errors exist. The FSER has been reviewed by SNC and determined to not include any information that SNC considers as proprietary or security-related information pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 "Public Inspections, Exemptions, Requests for Withholding," beyond that already identified by the NRC.

The review did identify a few minor discrepancies in the FSER and SNC requests that the NRC consider some revisions to make the information more directly pertinent to the topic being discussed. These items are identified in the enclosure to this letter and include proposed revisions to the identified language. In addition, the enclosure also identifies some obvious typographical and editorial discrepancies for which the NRC may also want to consider revision.

DO92
NRC

If there are any questions regarding this report, please contact me at (205) 992-5805 or Mr. Wes Sparkman at (205) 992-5061.

Ms. A. G. Aughtman states she is the AP1000 Licensing Supervisor of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and to the best of her knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



A. G. Aughtman

Sworn to and subscribed before me this 9th day of August, 2011

Notary Public: Nancy Louise Henderson

My commission expires: March 23, 2014

AGA/lp

Enclosure: FSER Review Findings

cc: Southern Nuclear Operating Company

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Southern Nuclear Operating Company

ND-11-1670

Enclosure

**Final Safety Evaluation Report (FSER)
Review Findings**

Information Discrepancies:

The following items represent minor information discrepancies that should be considered for revision.

1. FSER Page 1-64, Section 1.5.5

Under the sub-heading, "Security Review for 10 CFR Part 70 Materials," the FSER states that the applicant's PSP for the protection of SNM has been marked as "Safeguards Information" pursuant to 10 CFR 2.390. The marking for "Safeguards Information" is pursuant to 10 CFR 73.21 and 73.22, rather than 10 CFR 2.390.

Suggested revision:

The staff's review of the applicant's PSP for the protection of SNM of low strategic significance (LSS) includes information that has been marked as "Safeguards Information" by the applicant, pursuant to 10 CFR ~~2.390~~ 73.21 and 73.22.

2. FSER Page 8-4, Section 8.1.4

The last paragraph of Section 8.1.4 states that FSAR Section 1.9.5.1.5 and 1.9.6 have been updated, including identification of Plant Wilson as a local power source. While these sections of the FSAR were updated, the update did not include identification of Plant Wilson as a local power source. In SNC letter ND-09-0671, dated 5/15/2009, SNC specifically stated that "While Plant Wilson could be made available to re-supply power to Units 3 or 4 following a loss of the grid, this capability has not been credited as an alternate ac (AAC) power source." This information was provided only in the letter and was not identified as material to be included in the FSAR.

Suggested revision:

The NRC staff verified that VEGP COL FSAR Sections 1.9.5.1.5 and 1.9.6 have been updated to include the above-mentioned items ~~including the identification of Plant Wilson as a local power source that could be made available to re-supply power to Units 3 and 4 following a loss of the grid in accordance with NUMARC 87-00.~~

3. FSER Page B-192 and B-193, Appendix B

The last three letters in the Chronology listing appear to be from the SCANA-VCS docket rather than the SNC-VEGP docket.

Suggested revision:

Revise to omit these three SCANA references.

Typographical and Editorial Discrepancies:

The following items represent minor obvious typographical and editorial discrepancies that should also be considered for revision.

4. FSER Page 1-18, Section 1.4.2

Under the heading "Section 1.3 Comparisons with Similar Facility Designs," the FSER states that this section of the FSAR incorporates by reference Section 1.3 of the AP1000 DCD Revision 15, with no supplements. It should say Revision 19, with no supplements. Revision 19 is the referenced DCD.

5. FSER Page 1-18, Section 1.4.2

Under the heading "Section 1.4 Identification of Agents and Contractors," the FSER states that this section of the FSAR incorporates by reference Section 1.4 of the AP1000 DCD Revision 15. It should say Revision 19. Revision 19 is the referenced DCD.

6. FSER Page 1-20, Section 1.4.2

Under the heading "Section 1.7 Drawings and other Detailed Information," the FSER states that this section of the FSAR incorporates by reference Section 1.7 of the AP1000 DCD Revision 15. It should say that this section incorporates by reference Revision 19. Revision 19 is the referenced DCD.

7. FSER Appendix A, Page A-2, Section A.1 for License Condition 1-1, item (b)(i)

The wording for proposed License Condition 1-1, item (b)(i) is not consistent with the similar proposed License Condition in FSER Section 1.5.5, page 1-67.

8. FSER Page 14-32, Section 14.2.5.5, & Page A-10, Section A.1 for License Condition 14-3

The proposed wording for License Condition (14-3) states:

The licensee shall notify the Director of the NRO in writing when it determines that it has completed the design-specific testing identified below and confirmed that the test results are within the range of acceptable values predicted or otherwise confirm that the tested systems perform their specific functions in accordance with the FSAR:

The phrase "that is has" should read "that it has" for proper grammar.

9. FSER Page A-15, Section A.2

The proposed wording for the license states:

1. The licensee shall perform and satisfy the pipe rupture hazards analysis ITAAC defined in SER Table 2.5-1, "Pipe Rupture Hazards Analysis ITAAC."

Since the title of Table 2.5-1 is actually "Backfill ITAAC," it should read:

1. The licensee shall perform and satisfy the backfill ITAAC defined in SER Table 2.5-1, "Backfill ITAAC."