

In the event that the NRC believes that changes are required to an ITAAC and the licensee does not agree, the NRC can ultimately issue an order that modifies the license if the standards for imposing such a modification by order are met (10 C.F.R. § 50.109 for site-specific ITAAC and 10 C.F.R. § 52.63(a)(4) for ITAAC referenced from a standard design certification). For ITAAC contained in a design certification, the NRC can also generically change the ITAAC via rulemaking if the thresholds in 10 C.F.R. § 52.63(a)(1) are satisfied. According to 10 C.F.R. § 52.63(a)(3), a generic modification to a design certification rule would apply to all plants referencing the certified design unless the modification were rendered technically irrelevant by a plant-specific departure.

16. How many ITAACs does the Staff estimate will be standard ITAACs for other AP1000 COLs? Please identify those ITAACs.

Staff Response:

The total inventory (875) and sources for the ITAAC are identified in Appendix C to the draft combined license (COL) for Vogtle, Unit 3 (ML111780143). All of the ITAAC that were incorporated by reference (819) from the AP1000 design control document (DCD), which are identified in Appendix C, will be standard for the other COLs that reference the AP1000 standard design. Of the remaining ITAAC, 31 came from the Vogtle Early Site Permit and 25 came from the COL.

The unit-specific ITAAC are identifiable by the leading alpha character (either a C or an E) of the assigned ITAAC number. The standard AP1000 ITAAC do not have a leading alpha character.

17. Please provide a summary of COL items that are expected to be referenced in future COLs and those that will be strictly site-specific.

Staff Response:

FSAR information that addresses a DCD Combined License Information Item and is common to other COL applications is designated as a standard (STD) COL item. The standard information is expected to be referenced in future COL applications. Vogtle FSAR Table 1.8-202 (VEGP COL FSAR Pages 1.8-4 through 1.8-21) identifies each COL item in the Vogtle COL application and provides a cross-reference between the referenced DCD subsection and the FSAR section. Of the 433 143 COL items, 90 contain standard information. Standard information may be supplemented by plant-specific information and will be identified appropriately. The application contains 43 53 site-specific COL information items.

18. What process was used to determine which technical areas involved interfaces between the COL and matters addressed by the design certification that would have otherwise been excluded from consideration in the COL review?

Staff Response:

Consistent with 10 C.F.R. § 52.79(d)(2), applicants referencing a standard design certification must demonstrate that the interface requirements established for the design under § 52.47 have

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

In the Matter of)
)
SOUTHERN NUCLEAR OPERATING CO.) Docket Nos. 52-025-COL and 52-026-COL
)
(Vogtle Electric Generating Plant)
Units 3 and 4))
)

CERTIFICATE OF SERVICE

I hereby certify that copies of "Exhibit NRC00008B" have been served upon the following persons by Electronic Information Exchange this 20th day of September, 2011:

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this 20th day of September, 2011