UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 16, 2013

Mr. C. R. Pierce
Regulatory Affairs Director
Southern Nuclear Operating Company, Inc.
Post Office Box 1295, Bin - 038
Birmingham, AL 35201-1295

SUBJECT: VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2 (VEGP) – REQUEST FOR ADDITIONAL INFORMATION (TAC NOS. ME9555 and ME9556)

Dear Mr. Pierce:

By letter dated September 13, 2012 (Agencywide Documents Access and Management System Accession No. ML12258A055), Southern Nuclear Operating Company, Inc. (SNC), submitted a license amendment request for the stated purpose of modifying the VEGP Technical Specifications requirements to permit the use of Risk Informed Completion Times in accordance with NEI 06-09, Revision 0, *Risk Informed Technical Specifications Initiative 4b, Risk-Managed Technical Specifications (RMTS) Guidelines*. The Nuclear Regulatory Commission (NRC) staff finds that additional information is needed as set forth in the Enclosure.

The NRC staff would usually request that responses to requests for additional information (RAIs) be made within thirty (30) days of the date of the RAI letter. However, considering the pilot nature of this review, the staff recognizes that additional time may be required for SNC to respond. Therefore, we request that SNC provide a schedule for the responses to these RAIs, not to exceed 120 days.

Sincerely,

Robert Martin

Robert E. Martin, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-424 and 50-425

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

BY THE OFFICE OF NUCLEAR REACTOR REGULATION

VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2 (VEGP)

SOUTHERN NUCLEAR OPERATING COMPANY (SNC)

PILOT REVIEW OF LICENSE AMENDMENT REQUEST TO

REVISE TECHNICAL SPECIFICATIONS TO IMPLEMENT NEI 06-09, REVISION 0,

"RISK-INFORMED TECHNICAL SPECIFICATIONS INITIATIVE 4B, RISK MANAGED

TECHNICAL SPECIFICATIONS (RMTS) GUIDELINES"

1. The "Notes" to the list of individual limiting condition for operation (LCO) required actions (RAs) modified in the proposed amendment (list begins on page A1-6, Notes on page A1-11) identify deviations from TSTF-505, Revision 1, *Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b* (TSTF-505). Almost one half of the 57 proposed changes are augmented with Notes 1, 2, and 4, which identify substantive differences between the proposed RA and (presumably) an RA that would have been consistent with TSTF-505. The license amendment request (LAR) states that justification for the differences is provided in Enclosure 1 (primarily Table E1.1). However, the justifications provided in the enclosure are simply statements with little discussions specifying why the guidance in the Nuclear Regulatory Commission (NRC) staff's endorsed guidance need not be applied. Please clarify the following issue related to the identified deviations.

   A. Note 1 states that the "RA is consistent with the intent of the standard." Please identify the discussions in the endorsed guidance that indentify the "intent" mentioned, describe the procedural and technical aspects that illustrate how that intent is reflected in the endorsed guidance, and explain how your proposal satisfies each of these procedural and technical aspects even though it differs from the endorsed guidance.

      For example, the risk managed technical specifications (RMTS) cannot be voluntarily entered on a total loss of specified safety function for the affected Technical Specification (TS) system. Contrary to this, the following conditions would allow voluntary entry for a loss-of-safety function and the proposed required actions would allow the option to calculate a risk informed completion time (RICT).

      - TS 3.4.11: Pressurizer Power Operated Relief Valves, Condition F: More than one block valve inoperable.

B. Note 2 refers to "plant specific conditions" that justify differences. For each of these proposed RAs, please describe the electrical or mechanical or other physical characteristics at your plant that differ from the generic plant characteristics, how the endorsed guidance would have reflected the generic plant characteristics, and how the differing characteristics at your plant justify the different treatment between the endorsed guidance and your proposal.

For example, the RMTS cannot be voluntarily entered on a total loss of specified safety function for the affected TS system. Contrary to this, the following conditions would allow voluntary entry for a loss-of-safety function and the proposed required actions would allow the option to calculate a RICT.

- TS 3.7.2: Main Steam Isolation Valves (MSIVs)" Condition A and B, one or more steam lines with one/two MSIV systems inoperable in MODE 1.

C. Note 4 refers to RAs that are "outside the scope of TSTF-505." Examples of some of your proposed RAs that differ from the endorsed guidance are provided below. Please provide the new information that has become available which demonstrates that these RAs should be included in your RMTS program.

For example, only TS LCOs governing system, structures, and components which can be assessed using the configuration risk management program (CRMP) and underlying PRA models may be subject to the RMTS. Contrary to this, the following system, structures, and components are listed as being included in the CRMP.

- TS 3.7.13: Piping Penetration Area Filtration and Exhaust System (PPAFES).

- TS 3.7.14: Engineered Safety Features Room Cooler and Safety Related Chiller System.

In another example, the RMTS cannot be voluntarily entered on a total loss of specified safety function for the affected system. Contrary to this, the following conditions will allow voluntary entry yet are included in the CRMP.

- TS 3.7.2: Main Steam Isolation Valves (MSIVs)" Condition D and E, One or more steam lines with one/two MSIVs inoperable in MODE 2 or 3.

- TS 3.7.3: Main Feedwater Isolation Valves, Conditions A.1, B.1, C.1 and D.1. Also, TSTF-505 excludes application of a RICT to these conditions because they do not specify a restoration action.

In another example, the RMTS does not address variable parameter limits and setpoints. Contrary to this, the LAR applies RMTS to variables not within limits and/or required actions that require restoration of limits or set points.

- TS 3.5.5: Seal Injection Flow.
- TS 3.7.1: Main Steam Safety Valves.
- TS 3.7.6: Condensate Storage Tank – Unit 1 and Unit 2.
- TS 3.8.3: Diesel Fuel Oil, Lube Oil, Starting Air, and Ventilation.

2. If the three notes discussed above do not include all deviations from TSTF-505, please provide all other deviations and provide a technical basis for each deviation.

3. NRC staff has not located any list in the LAR that provides deviations from NEI 06-09, Revision 0, "*Risk-Informed Technical Specifications Initiative 4b, Risk-Managed Technical Specifications (RMTS) Guidelines*," as endorsed by the NRC staff's safety evaluation. Please identify all such deviations and provide a technical basis for each deviation.

4. The regulations in 10 CFR 50.36 state that;

> *(b) Each license authorizing operation of a production or utilization facility of a type described in §50.21 or §50.22 will include technical specifications. The technical specifications will be derived from the analyses and evaluation included in the safety analysis report, and amendments thereto, submitted pursuant to §50.34. The Commission may include such additional technical specifications as the Commission finds appropriate.*

Therefore, 10 CFR 50.36 requires that TS be derived from the analyses and evaluation included in the safety analysis report. This LAR proposes to establish new conditions and required actions which permit application of a RICT when all trains of a TS system are inoperable. These new conditions are restricted to conditions in which at least one train of the TS system retains PRA functionality and the CRMP can discern which TS functions are available and which are failed due to the inoperability. Please address how the VEGP updated final safety analysis report will be revised to reflect the new analyses associated with PRA functionality and the CRMP for the new conditions and required actions.

For example, LCO 3.5.2 ECCS allows calculating a RICT when less than 100% of the ECCS flow equivalent to a single operable ECCS train is available provided at least one train retains PRA functionality. How is the flow rate required to retain PRA functionality calculated, e.g., what assumptions and computer codes are used? Where is the calculation documented? How is the available flow rate determined? How are changes (e.g., fuel reloads) incorporated into the process?

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/RA/
Robert E. Martin, Senior Project Manager
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Division of Operating Reactor Licensing
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