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Docket Nos.: 50-424  
50-425

NL-15-0812

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555-0001

Vogtle Electric Generating Plant, Units 1 & 2  
Operating License Revisions Associated with License Amendment Request to  
Revise Technical Specifications to Implement NEI 06-09, Revision 0-A,  
*Risk Informed Technical Specifications Initiative 4b,*  
*Risk Managed Technical Specifications (RMTS) Guidelines*

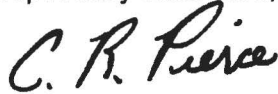
By letter dated September 13, 2012, Southern Nuclear Operating Company (SNC) submitted a license amendment request for the Vogtle Electric Generating Plant (VEGP) Technical Specifications (TS) to permit the use of Risk Managed Technical Specifications per Nuclear Energy Institute (NEI) Topical Report 06-09, Revision 0-A, *Risk Informed Technical Specifications Initiative 4b, Risk Managed Technical Specifications (RMTS) Guidelines*.

By letters dated May 16, 2013, June 9, 2014 (corrected by letter dated June 25, 2014), and October 14, 2014, the NRC requested additional information related to this license amendment request. SNC responded to those requests by letters dated August 2, 2013, July 17, 2014, and November 11, 2014 (further clarified via letter dated December 12, 2014). On February 19, 2015, a conference call was held between SNC and the NRC staff to discuss implementation items provided in the RAI responses discussed above. SNC responded to this request via NL-15-0381 dated March 16, 2015.

While confirming the OL pages affected by the aforementioned submittal with the NRC staff, it was identified that the affected Operating License (OL) pages require resubmittal due to the inadvertent omission of the original submittal date in the revised OL text. Enclosure 1 contains the markups to the existing OL pages and Enclosure 2 contains the clean-typed OL pages.

This letter contains no NRC commitments. If you have any questions, please contact Ken McElroy at (205) 992-7369.

Respectfully submitted,



C. R. Pierce  
Regulatory Affairs Director

CRP/EGA

References:

1. Southern Nuclear Operating Company letter, NL-12-1344, dated September 13, 2012, *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"*
2. NEI 06-09, Revision 0-A, November, 2006, *Risk Informed Technical Specifications Initiative 4b, Risk Managed Technical Specifications (RMTS) Guidelines*
3. NRC Letter dated May 16, 2013, *Vogtle Electric Generating Plant, Units 1 and 2 (VEGP) Request for Additional Information, (TAC Nos. ME9555 and ME9556)*
4. Southern Nuclear Operating Company letter, NL-13-1540, dated August 2, 2013, *Vogtle Electric Generating Plant Response to Request for Additional Information on Plant Vogtle 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"*
5. NRC Letter dated June 9, 2014, *Vogtle Electric Generating Plant, Units 1 and 2, Request for Additional Information (TAC Nos. ME9555 and ME9556)*
6. NRC Letter dated June 25, 2014, *Vogtle Electric Generating Plant, Units 1 and 2 – Corrected - Request for Additional Information, (TAC Nos. ME9555 and ME 9556)*
7. Southern Nuclear Operating Company letter, NL-14-1016, dated July 17, 2014, *Vogtle Electric Generating Plant, Units 1 and 2, Response to Request for Additional Information on Plant Vogtle 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"*

8. NRC Letter dated October 14, 2014, *Vogtle Electric Generating Plant, Units 1 and 2, Request for Additional Information (TAC Nos. ME9555 and ME9556)*
9. NRC Letter dated April 24, 2013, *Vogtle Electric Generating Plant, Units 1 and 2, Issuance of Amendments Regarding Adoption of TSTF-439, "Eliminate Second Completion Times Limiting Time from Discovery of Failure to Meet an LCO" (TAC Nos. ME9470 and ME9471)*
10. Southern Nuclear Operating Company letter, NL-14-1703, dated November 11, 2014, *Vogtle Electric Generating Plant, Units 1 and 2, Response to Request for Additional Information on Plant Vogtle 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"*
11. Southern Nuclear Operating Company Letter, NL-14-1974, dated December 12, 2014, *Vogtle Electric Generating Plant, Units 1 & 2, Clarification of Response to Request for Additional Information on Plant Vogtle 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"*
12. Southern Nuclear Operating Company Letter, NL-15-0381, dated March 16, 2015, *License Conditions for 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"*

Enclosures:

1. Operating Licenses Marked Up Pages
2. Operating Licenses Clean Typed Pages

cc: Southern Nuclear Operating Company  
Mr. S. E. Kuczynski, Chairman, President & CEO  
Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer  
Mr. D. R. Madison, Vice President – Fleet Operations  
Mr. M. D. Meier, Vice President – Regulatory Affairs  
Mr. B. K. Taber, Vice President – Vogtle 1 & 2  
Mr. B. J. Adams, Vice President – Engineering  
Mr. G. W. Gunn, Regulatory Affairs Manager – Vogtle 1 & 2  
RType: CVC7000

U. S. Nuclear Regulatory Commission  
Mr. V. M. McCree, Regional Administrator  
Mr. R. E. Martin, NRR Senior Project Manager – Vogtle 1 & 2  
Mr. L. M. Cain, Senior Resident Inspector – Vogtle 1 & 2  
Mr. G. E. Miller, NRR Project Manager

**Vogtle Electric Generating Plant, Units 1 & 2  
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**Enclosure 1**

**Operating Licenses Marked Up Pages**

7. Spent fuel pool mitigation measures

- (c) Actions to minimize release to include consideration of:
1. Water spray scrubbing
  2. Dose to onsite responders

(11) Additional Conditions

The Additional Conditions contained in Appendix D, as revised through Amendment No. 173 are hereby incorporated into this license. Southern Nuclear shall operate the facility in accordance with the Additional Conditions.

- D. The facility requires exemptions from certain requirements of 10 CFR Part 50 and 10 CFR Part 70. These include (a) an exemption from the requirements of 10 CFR 70.24 for two criticality monitors around the fuel storage area, and (b) an exemption from the requirements of Paragraph III.D.2(b)(ii) of Appendix J of 10 CFR 50, the testing of containment air locks at times when containment integrity is not required. The special circumstances regarding exemption b are identified in Section 6.2.6 of SSER 5.

An exemption was previously granted pursuant to 10 CFR 70.24. The exemption was granted with NRC materials license No. SNM-1967, issued August 21, 1986, and relieved GPC from the requirement of having a criticality alarm system. GPC and Southern Nuclear are hereby exempted from the criticality alarm system provision of 10 CFR 70.24 so far as this section applies to the storage of fuel assemblies held under this license.

These exemptions are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security. The exemptions in items b and c above are granted pursuant to 10 CFR 50.12. With these exemptions, the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.

- E. Southern Nuclear shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plan, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Southern Nuclear Operating Company Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan," with revisions submitted through May 15, 2006.

Southern Nuclear shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The Southern Nuclear CSP was approved by License Amendment No. 162.

- F. GPC shall comply with the antitrust conditions delineated in Appendix C to this license.



Amendment Number	Additional Condition	Implementation Date
102	The licensee will implement all applicable crane, load path and height, rigging and load testing guidelines of NUREG-0612 and ANSI Standard B30.2, as described in the licensee's letters dated September 4, 1997, May 19 and June 12, 1998, and evaluated in the staff's Safety Evaluation dated June 29, 1998	Before and during reracking operations, as appropriate.
154	<p>Upon implementation of the Amendment adopting TSTF-448, Revision 3, the determination of CRE unfiltered air inleakage as required by SR 3.7.10.5, in accordance with TS 5.5.20.c.(i), and the measurement of CFE pressure as required by Specification 5.5.20.d, shall be considered met. Following implementation:</p> <p>(a) The first performance of SR 3.7.10.5, in accordance with Specification 5.5.20.c.(i), shall be within the specified frequency of 6 years, plus the 18-month allowance of SR 3.0.2, as measured from March 23, 2004, the date of the most recent successful tracer gas test, as stated in the June 16, 2004 letter response to Generic Letter 2003-01, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.</p> <p>(b) The first performance of the periodic assessment of CRE habitability, specification 5.5.20.c.(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, as measured from March 23, 2004, the date of the most recent successful tracer gas test, as stated in the June 16, 2004 letter response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.</p> <p>The first performance of the periodic measurement of CRE pressure, specification 5.5.20.d, shall be within 18 months, plus the 138 days allowance of SR 3.0.2, as measured from March 23, 2004, the date of the most recent successful pressure measurement test, or within 138 days if not performed previously.</p>	As stated in the Additional Condition
173	<p>Southern Nuclear Operating Company (SNC) is approved to implement 10 CFR 50.69 using the processes for categorization of Risk-Informed Safety Class (RISC)-1, RISC-2, RISC-3, and RISC-4 structures, systems, and components (SSCs) specified in the licensee amendment request submittals dated August 31, 2012, May 17, 2013, September 13, 2013, May 2, 2014, July 22, 2014 and August 11, 2014.</p> <p>The licensee shall implement the items listed in enclosure 1, Implementation items of SNC letter NL-14-0960, dated July 22, 2014, prior to categorizing systems under the process.</p> <p>NRC prior approval, under 10 CFR 50.90, is required for a change to a categorization process that is outside the bounds specified above (e.g., change from a seismic margins approach to a seismic probabilistic risk assessment approach).</p>	As stated in the Additional Condition

Unit 1 Operating  
License Insert

successfully demonstrated prior to the time and condition specified below for each:

- a) DELETED
  - b) DELETED
  - c) SR 3.8.1.20 shall be successfully demonstrated at the first regularly scheduled performance after implementation of this license amendment.
- (3) Southern Nuclear Operating Company shall be capable of establishing containment hydrogen monitoring within 90 minutes of initiating safety injection following a loss of coolant accident.

(4) Mitigation Strategy License Condition

The licensee shall develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

- (a) Fire fighting response strategy with the following elements:
    - 1. Pre-defined coordinated fire response strategy and guidance
    - 2. Assessment of mutual aid fire fighting assets
    - 3. Designated staging areas for equipment and materials
    - 4. Command and control
    - 5. Training of response personnel
  - (b) Operations to mitigate fuel damage considering the following:
    - 1. Protection and use of personnel assets
    - 2. Communications
    - 3. Minimizing fire spread
    - 4. Procedures for implementing integrated fire response strategy
    - 5. Identification of readily-available pre-staged equipment
    - 6. Training on integrated fire response strategy
    - 7. Spent fuel pool mitigation measures
  - (c) Actions to minimize release to include consideration of:
    - 1. Water spray scrubbing
    - 2. Dose to onsite responders
- (5) Additional Conditions

The Additional Conditions contained in Appendix D, as revised through Amendment No. 155 are hereby incorporated into this license. Southern Nuclear | shall operate the facility in accordance with the Additional Conditions.

- D. The facility requires exemptions from certain requirements of 10 CFR Part 50 and 10 CFR Part 70. These include (a) an exemption from the requirements of 10 CFR 70.24 for two criticality monitors around the fuel storage area, and (b) an exemption from the requirements of Paragraph III.D.2(b)(ii) of Appendix J of 10 CFR 50, the testing of containment air locks at times when containment integrity is not required. The special circumstances regarding exemption b are identified in Section 6.2.6 of SSER 8.

Amendment Number	Additional Condition	Implementation Date
155	<p>Southern Nuclear Operating Company (SNC) is approved to implement 10 CFR 50.69 using the processes for categorization of Risk-Informed Safety Class (RISC)-1, RISC-2, RISC-3, and RISC-4 structures, systems, and components (SSCs) specified in the licensee amendment request submittals dated August 31, 2012, May 17, 2013, July 2, 2013, September 13, 2013, May 2, 2014, July 22, 2014 and August 11, 2014.</p> <p>The licensee shall implement the items listed in enclosure 1, Implementation items of SNC letter NL-14-0960, dated July 22, 2014, prior to categorizing systems under the process.</p> <p>NRC prior approval, under 10 CFR 50.90, is required for a change to a categorization process that is outside the bounds specified above (e.g., change from a seismic margins approach to a seismic probabilistic risk assessment approach.)</p>	As stated in the Additional Condition

Unit 2 Operating  
License Insert



### Unit 1 Operating License Insert

	<p>Southern Nuclear Operating Company (SNC) is approved to implement the Risk Informed Completion Time Program as specified in the licensee amendment request submittals dated September 13, 2012, August 2, 2013, July 17, 2014, November 11, 2014, and December 12, 2014.</p> <p>The licensee shall implement the items listed in enclosure 1, Implementation Items, of SNC letter NL-15-0381 dated March 16, 2015 prior to the implementation of the Risk Informed Completion Time Program.</p>	<p>As stated in the Additional Condition</p>
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## Unit 2 Operating License Insert

	<p>Southern Nuclear Operating Company (SNC) is approved to implement the Risk Informed Completion Time Program as specified in the licensee amendment request submittals dated September 13, 2012, August 2, 2013, July 17, 2014, November 11, 2014, and December 12, 2014.</p> <p>The licensee shall implement the items listed in enclosure 1, Implementation Items, of SNC letter NL-15-0381 dated March 16, 2015 prior to the implementation of the Risk Informed Completion Time Program.</p>	<p>As stated in the Additional Condition</p>
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**Vogtle Electric Generating Plant, Units 1 & 2**  
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**to Revise Technical Specifications to Implement NEI 06-09, Revision 0-A,**  
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***Risk Managed Technical Specifications (RMTS) Guidelines***

**Enclosure 2**

**Operating Licenses Clean-Typed Pages**

7. Spent fuel pool mitigation measures

- (c) Actions to minimize release to include consideration of:
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These exemptions are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security. The exemptions in items b and c above are granted pursuant to 10 CFR 50.12. With these exemptions, the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.

- E. Southern Nuclear shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plan, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Southern Nuclear Operating Company Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan," with revisions submitted through May 15, 2006.

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- F. GPC shall comply with the antitrust conditions delineated in Appendix C to this license.

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successfully demonstrated prior to the time and condition specified below for each:

- a) DELETED
  - b) DELETED
  - c) SR 3.8.1.20 shall be successfully demonstrated at the first regularly scheduled performance after implementation of this license amendment.
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	<p>Southern Nuclear Operating Company (SNC) is approved to implement the Risk Informed Completion Time Program as specified in the licensee amendment request submittals dated September 13, 2012, August 2, 2013, July 17, 2014, November 11, 2014, and December 12, 2014.</p> <p>The licensee shall implement the items listed in enclosure 1, Implementation Items, of SNC letter NL-15-0381 dated March 16, 2015 prior to the implementation of the Risk Informed Completion Time Program.</p>	As stated in the Additional Condition