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JUL 20 2015

Docket Nos.: 52-025
52-026

ND-15-1110
10 CFR 50.90

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

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4
Supplement to Request for License Amendment:
Tier 2* Editorial and Consistency Changes (LAR-13-033S2)

Ladies and Gentlemen:

In accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC), the licensee for Vogtle Electric Generating Plant (VEGP) Units 3 and 4, requested an amendment to Combined License (COL) Numbers NPF-91 and NPF-92 for VEGP Units 3 and 4, respectively, by SNC letter ND-14-1045, dated July 30, 2014 [ADAMS Accession No. ML14211A666]. The SNC license amendment request (LAR) proposed to depart from the approved AP1000 Design Control Document (DCD) by making editorial and consistency enhancements to Tier 2* information in the Updated Final Safety Analysis Report (UFSAR). As noted in the July 30, 2014 letter, the changes proposed in this LAR (SNC LAR-13-033) are consistent with and identical in technical content with the South Carolina Electric and Gas Company (SCE&G) LAR 14-03 submittal dated June 12, 2014 [ADAMS Accession No. ML14164A099] on this topic.

SNC LAR-13-033 was supplemented by information in letter ND-14-1895 (LAR-13-033S), dated December 12, 2014 [ADAMS Accession No. ML14346A287], which corresponded with Request for Additional Information (RAI) responses provided by SCE&G in their letters dated October 9, 2014 and November 21, 2014 [ML14282A532 and ML14325A771, respectively]. By letter dated June 2, 2015 [ADAMS Accession No. ML15154A674], SCE&G provided clarifying information to supplement the response to electronic RAI (eRAI) 7671 provided in their November 21, 2014 letter.

Because SNC LAR-13-033 is within the scope of the information requested in eRAI 7671 and the clarifying information in the SCE&G supplement, SNC elects to provide the same supplemental information as that provided by SCE&G in their June 2, 2015 letter. The SNC response to eRAI 7671 is found in Enclosure 5 of this letter and replaces the original response to eRAI 7671 provided in Enclosure 4 of the December 12, 2014 letter in its entirety. The response to eRAI 7663, also provided in the December 12, 2014 letter remains valid. Enclosures 1 through 3, which were provided with the original SNC LAR-13-033 in SNC letter ND-14-1045, also remain valid.

The information provided in Enclosure 5 does not change the scope of, nor affect the Technical Evaluation or the conclusions of the Significant Hazards Consideration determination in the original license amendment request (LAR-13-033) submitted on July 30, 2014. This letter contains no regulatory commitments.

This supplement also extends the requested approval date for LAR-13-033 by three months to October 30, 2015. This license amendment will be implemented by SNC within 30 days of approval.

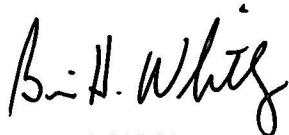
In accordance with 10 CFR 50.91, SNC is notifying the State of Georgia of this LAR supplement by transmitting a copy of this letter and enclosure to the designated State Official.

Should you have any questions, please contact Mr. Jason Redd at (205) 992-6435.

Mr. Brian H. Whitley states that: he is the Regulatory Affairs Director of Southern Nuclear Operating Company; he is authorized to execute this oath on behalf of Southern Nuclear Operating Company; and to the best of his knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



Brian H. Whitley

BHW/NH/ljs

Sworn to and subscribed before me this 20th day of July, 2015

Notary Public: Lisa Myrick Spears

My commission expires: June 18, 2019



- Enclosures: 1) - 3) (previously submitted with the original LAR, LAR-13-033, in SNC letter ND-14-1045)
- 4) (previously submitted with the first supplement to the original LAR, LAR-13-033S, in SNC letter ND-14-1895)
- 5) Vogtle Electric Generating Plant (VEGP) Units 3 and 4, Revised Response to Request for Additional Information (eRAI 7671) Regarding License Amendment Request (LAR) 13-033 (LAR-13-033S2)

cc:

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Document Services RTYPE: VND.LI.L00

File AR.01.02.06

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Southern Nuclear Operating Company

ND-15-1110

Enclosure 5

(Note that Enclosures 1 through 3 were provided with the original license amendment request, LAR-13-033, in SNC letter ND-14-1045 and Enclosure 4 was provided in the supplement, LAR-13-033S, in SNC letter ND-14-1895)

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

**Revised Response to Request for Additional Information (eRAI 7671)
Regarding License Amendment Request (LAR) 13-033
(LAR-13-033S2)**

(This enclosure contains three pages, including this cover page.)

Electronic Request for Additional Information (eRAI) Tracking No. 7671

NRC Question:

In its letter dated July 9, 2014, the licensee of V.C. Summer Nuclear Stations Units 2 and 3 submitted License Amendment Request (LAR) 14-03, which proposes editorial and consistency changes within Tier 2* information in its Updated Final Safety Analysis Report (UFSAR). One requested change relates to Tier 2* information in Subsection 5.2.1.1, "Compliance with 10 CFR 50.55a," of the UFSAR. In particular, the licensee requests that the specification of Chapters IV, V, VI, and VII in the ASME B31.1 Code as Tier 2* information be changed to Chapters IV, V, and VI of the ASME B31.1 Code. The licensee indicates that Chapter VII appears in the 2007 version of the ASME B31.1 Code, but does not exist in the 1989 version of the ASME B31.1 Code referenced in the UFSAR.

The NRC staff requests that the licensee specify where the provisions in Chapter VII, "Operation and Maintenance," in the 2007 version of the ASME B31.1 Code are addressed in the 1989 version of the ASME B31.1 Code.

Revised SNC Response:

The requirement from Chapter VII of the 2007 version is addressed in Appendix V of the 1989 version of the ASME B31.1 Code.

Appendix V, Section 2.0, *Operating and Maintenance Program*, of the 1989 version of the ASME B31.1 Code, similar to Chapter VII of the 2007 version, requires that "Each Operating Company shall develop an operating and maintenance program comprising a series of written procedures, keeping in mind that it is not possible to prescribe a single set of detailed operating and maintenance procedures applicable to all piping systems." The requirement from Chapter VII of the 2007 version is therefore addressed in Appendix V of the 1989 version of the ASME B31.1 Code.

The removal of Chapter VII from Subsection 5.2.1.1 of the UFSAR is editorial in nature, as both the current "Fabrication, examination, inspection, and testing requirements" and proposed "Dimensional fabrication, assembly, erection, inspection, examination, and testing requirements" are covered by Chapters IV, V, and VI of the 1989 version of the ASME B31.1 Code, and would be unaffected by the removal of Chapter VII of the 2007 version of the ASME B31.1 Code. Therefore, the proposed change does not have an adverse impact.

Additional Clarification:

The ASME B31.1 Code is applicable to the nonsafety-related portion of the Chemical and Volume Control System (CVS) inside containment, which begins after the third isolation valve between the Reactor Coolant System (RCS) and the CVS. These three isolation valves are described as active safety-related valves in Subsection 5.2.1.3 of the UFSAR, and as such are subject to the UFSAR 5.2.1.1 requirements that "Inservice inspection of the reactor coolant pressure boundary is conducted in accordance with the applicable edition and addenda of the ASME Boiler and Pressure Vessel Code Section XI, as described in Subsection 5.2.4. Inservice testing of the reactor coolant pressure boundary components is in accordance with the edition and addenda of

the ASME OM code as discussed in Subsection 3.9.6 for pumps and valves, and as discussed in Subsection 3.9.3.4.4 for dynamic restraints.”

This is consistent with the description of the CVS valve inspection and testing provided in Subsection 9.3.6.6.1.1 of the UFSAR, and with the CVS design enhancements described in Subsection 5.2.1.1 of NUREG-1793.