

# PUBLIC SUBMISSION

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Receipt and Availability of Application for a Combined License; Southern Nuclear Operating Company

**Comment On:** NRC-2008-0252-0049

Vogtle Electric Generating Station, Units 3 and 4; License Amendment Application

**Document:** NRC-2008-0252-DRAFT-0006

Comment on FR Doc # 2015-16796

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## General Comment

Comments on LAR 15-009, Revision 2-SNC  
Vogtle NRC 2008-0252

These are revised comments. Original comments were submitted on July 21, 2015.

Vogtle Electric Generating Plant Units 3 and 4  
Southern Nuclear Operating Company (SNC)

Current Licensing Basis:

The licensee submittal dated June 29, 2015 (ML15181A078) states in part, The use of AWS D1.1-2000 is necessary for future welding and for installed welding to resolve an item noted by a Nuclear Regulatory Commission (NRC) inspector.

This implies that the current design only includes 2000 STD and the new licensing basis going forward will be STD 2000 rather than 1992 for the subject welds.

However, the proposed changes to UFSAR Section 3.8.3.2 states,

AWS D1.1-2000 is an acceptable code for use in lieu of AWS D1.1-1992 for the design,

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qualification, fabrication, and inspection for AISC N690 applications.

This statement is confusing in that it does not provide clear licensing basis for the subject welds. This statement implies that the current code of use is 1992 but you can use of 2000 code as an acceptable code and this is not true based on the current design. Moreover, down the road (from 10 years from now) when the licensee design engineer wants modify or revise this, he/she should have clear and crisp understanding of the licensing basis and the proposed change does not provide the clarity in the licensing basis. In addition, in one of the public meeting related to this license amendment request, the licensee stated that it wants to retain 1992 code as approved with the certified AP1000 design. If 1992 code is not used, there is no reason to keep it. And by deleting the 1992 code from the Vogtle licensing basis has no impact the AP1000 Certification Rule and other COL applicants can still use 1992 Code.

Based upon above, the NRC should ask licensee to revise the proposed changes to the UFSAR to reflect clear licensing basis and then only the staff should approve the licensee request.

Use of AWS D.1.1 2010:

The licensee has discussed and justified changes related weld configuration not covered by AWS-2000 standard. Licensee states that it has added supplemental provisions consistent with AWS D1.1-2010. This statement is partially true in that the licensee has not identified AWS 2010 standard in the markup of UFSAR changes. The NRC staff should ask licensee to add a reference to 2010 Standard in the mark-up of the UFSAR changes before the NRC approves the licensee request.

NO Significant Hazards Consideration (NO SHC) discussion:

The licensee discussion for Criterion 3, significant reduction in the margin of safety, does takes credit for testing performed by the industry and reported in a journal. It is my understanding that the NRC has not reviewed/accepted those tests. Moreover, the licensee has not provided robust justification (in Technical Evaluation Section of the LAR) indicating its applicability to the Vogtle Units 3 and 4 Welds. The licensee has utilized the Finite Element Analysis to support its changes. The summary of that discussion should have included in this NO-SHC. Therefore, the licensee determination for no significant hazards consideration required by 10 CFR 50.92(c) is incomplete and flawed.

Change Process used by Licensee:

On Page 6 of 22 of Enclosure 6, the licensee states in part, The AWS D1.1 code reference was subsequently removed by departure in the interest of clarity, with the intent that the standards identified in the remaining references would be applied. It has since been determined that the AWS D1.1-2000 version is the preferred version for welding activities associated with steel structures (consistent with the use of AWS D1.1-2000 for the ACI 349 welding activities associated with concrete structures). However, adding AWS D1.1-2000 for use with AISC N690-1994 activities involves Tier 2\* information since it is not consistent with the existing Tier 2\* AISC N690-1994 requirements. The changes to the UFSAR Subsections 3.8.3.2 and 3.8.4.2 which add reference to AWS D1.1-2000 and supplemental provisions are designated as Tier 2\* information.

The above information implies that the licensee used 10 CFR Part 52, Appendix D Section VIII process to remove the code reference and did not ask NRC to review that change because the licensee concluded that it can implement that change without NRC prior approval. On the other hand, it is asking NRC to approve for putting back that reference in the UFSAR. It appears that the licensee may have violated the regulatory change process when it removed that reference from the UFSAR. It is recommended that the NRC should review the licensees paper work related that

change and if the licensee has violated the change process (required by regulations), the NRC should cite this as a violation.