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SEP 21 2015

Docket Nos.: 50-424
50-425

NL-15-1739

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

**Vogtle Electric Generating Plant – Units 1 and 2
Response to Request for Additional Information Regarding
SNC License Amendment Request for TSTF-523, Revision 2**

References:

1. SNC Letter NL-14-1349, *Edwin I. Hatch Nuclear Plant – Units 1 and 2 License Amendment Request to Revise Technical Specifications Regarding Generic Letter 2008-01, Managing Gas Accumulation in accordance with TSTF-523, Revision 2, Using the Consolidated Line Item Improvement Process (CLIP),* dated May 12, 2015.
2. NRC Letter, *Vogtle Electric Generating Plant, Units 1 and 2 – Request for Additional Information on License Amendment Request (TAC NOS. MF6213 AND MF6214),* dated August 24, 2015.

Ladies and Gentlemen:

On May 12, 2015, in accordance with the provisions of 10 CFR 50.90 Southern Nuclear Operating Company (SNC) submitted a request for an amendment to the technical specifications (TS) for Vogtle Electric Generating Plant (VEGP), Units 1 and 2 (Reference 1).

The proposed amendment would modify TS requirements related to Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray systems," as described in TSTF-523, Revision 2, "Generic Letter 2008-01, Managing Gas Accumulation."

Following the submittal of the VEGP License Amendment Request, SNC received a request for additional information by the NRC on August 24, 2015 (Reference 2). Enclosure 1 provides the requested information. Enclosure 2 provides the replacement pages for the affected LAR VEGP Technical Specification Marked Up Pages. Enclosure 3 provides the replacement pages for the affected LAR VEGP Technical Specification Clean Typed Pages.

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

Mr. C. R. Pierce states he is Regulatory Affairs Director of Southern Nuclear Operating Company, 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,

C. R. Pierce

C. R. Pierce
Regulatory Affairs Director

CRP/GLS/lac

Sworn to and subscribed before me this 21 day of September, 2015.

Laura L. Croft

Notary Public

My commission expires: 10-8-2017

Enclosures: 1. Response to Request for Additional Information – TSTF-523
2. VEGP Technical Specification Marked Up Replacement Pages
3. VEGP Technical Specification Clean Typed Replacement Pages

cc: Southern Nuclear Operating Company
Mr. S. E. Kuczynski, Chairman, President & CEO
Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer
Mr. M. D. Meier, Vice President – Regulatory Affairs
Mr. B. K. Taber, Vice President – Vogtle 1 & 2
Mr. D. R. Madison, Vice President – Fleet Operations
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. L. D. Wert, Regional Administrator (Acting)
Mr. R. E. Martin, NRR Senior Project Manager – Vogtle 1 & 2
Mr. L. M. Cain, Senior Resident Inspector – Vogtle 1 & 2

State of Georgia
Mr. J. H. Turner, Director – Environmental Protection Division

**Vogtle Electric Generating Plant – Units 1 and 2
Response to Request for Additional Information Regarding
SNC License Amendment Request for TSTF-523, Revision 2**

Enclosure 1

Response to Request for Additional Information – TSTF-523

The NRC staff has reviewed the Vogtle Electric Generating Plant, Units 1 and 2 license amendment request and determined that additional information is necessary as noted below.

RAI No. 1

SNC stated in its May 12, 2015, application that the proposed amendment was consistent with TSTF-523, Revision 2. In Enclosure 1 of the submittal, Surveillance Requirement 3.9.6.2 uses the phrase "Verify required [residual heat removal] RHR loop locations..." versus the approved TSTF wording, "Verify RHR loop locations...." The wording in the submittal is inconsistent with TSTF-523 and Limiting Condition for Operation (LCO) 3.9.6, which specifies that two RHR loops shall be OPERABLE.

Revise the submittal to use the wording that is consistent with the approved TSTF-523 and LCO 3.9.6 or provide a technical justification for the deviation.

SNC Response to RA1:

Upon further review of the SNC LAR in the original letter, NL-15-0422, SR's 3.4.8.4 and 3.9.6.2 need to be amended to provide consistency with the TSTF-523, Revision 2 traveler. The new Surveillance Requirements (SR's) 3.4.8.4 and 3.9.6.2 will remove the word "required" to ensure consistency with TSTF-523, Revision 2. The SR's will now use the approved verbiage "Verify RHR loop locations susceptible to gas accumulation are sufficiently filled with water." Enclosure 2 will include the pages to replace in the LAR for VEGP Technical Specification Marked Up Pages sent in the original SNC letter NL-15-0422. Enclosure 3 will include the pages to replace in the LAR for the VEGP Technical Specification Clean Typed Pages sent in the original SNC letter NL-15-0422. This change ensures that the proposed amendment is now consistent with TSTF-523, Revision 2.

**Vogtle Electric Generating Plant – Units 1 and 2
Response to Request for Additional Information Regarding
SNC License Amendment Request for TSTF-523, Revision 2**

Enclosure 2

VEGP Technical Specification Marked Up Replacement Pages

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One RHR loop inoperable.	A.1 Initiate action to restore RHR loop to OPERABLE status.	Immediately
B. Required RHR loops inoperable. <u>OR</u> No RHR loop in operation.	B.1 Suspend all operations involving reduction in RCS boron concentration. <u>AND</u> B.2 Initiate action to restore one RHR loop to OPERABLE status and to operation.	Immediately Immediately
C. One or more valves used to isolate unborated water sources not secured in closed position.	C.1 Initiate action to secure valve(s) in closed position.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.4.8.1 Verify one RHR loop is in operation.	In accordance with the Surveillance Frequency Control Program
SR 3.4.8.2 Verify correct breaker alignment and indicated power are available to the required RHR pump that is not	In accordance with the Surveillance Frequency Control Program
SR 3.4.8.3 Verify each valve that isolates unborated water sources is secured in the closed position.	In accordance with the Surveillance Frequency Control Program

Insert SR 3.4.8.4 located on next page

Vogtle Units 1 and 2

3.4.8-2

Amendment No. ~~408~~ (Unit 1)
Amendment No. ~~86~~ Unit 2)

Insert as SR 3.4.8.4

SR 3.4.8.4

Verify RHR loop locations susceptible to gas accumulation are sufficiently filled with water.

In accordance with the Surveillance Frequency Control Program

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.2 Initiate action to restore one RHR loop to operation.	Immediately
	<u>AND</u> B.3 Close all containment penetrations providing direct access from containment atmosphere to outside atmosphere.	4 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.9.6.1 Verify one RHR loop is in operation and circulating reactor coolant at a flow rate of ≥ 3000 gpm.	In accordance with the Surveillance Frequency Control Program



SR 3.9.6.2	Verify RHR loop locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program
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**Vogtle Electric Generating Plant – Units 1 and 2
Response to Request for Additional Information Regarding
SNC License Amendment Request for TSTF-523, Revision 2**

Enclosure 3

VEGP Technical Specification Clean Typed Replacement Pages

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.4.8.4	Verify RHR loop locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.2 Initiate action to restore one RHR loop to operation.	Immediately
	<u>AND</u> B.3 Close all containment penetrations providing direct access from containment atmosphere to outside atmosphere.	4 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.9.6.1	Verify one RHR loop is in operation and circulating reactor coolant at a flow rate of ≥ 3000 gpm.	In accordance with the Surveillance Frequency Control Program
SR 3.9.6.2	Verify RHR loop locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program