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June 17, 2016

Docket No.: 52-025

ND-16-0895
10 CFR 50.90

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

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
Revised Preliminary Amendment Request (PAR):
Structural Design of Auxiliary Building Floors (PAR-16-009 R1)

Ladies and Gentlemen:

The U.S. Nuclear Regulatory Commission (NRC) issued the Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 combined licenses (COLs) (License Nos. NPF-91 and NPF-92, respectively) to Southern Nuclear Operating Company (SNC) on February 10, 2012.

By letter dated June 14, 2016, SNC submitted a request for a license amendment (LAR-16-009, SNC correspondence ND-16-0816) to amend the VEGP Units 3 and 4 Updated Final Safety Analysis Report (UFSAR) to revise details related to the structural design of auxiliary building floors.

As discussed during the May 26, 2016, pre-submittal public meeting, SNC is submitting this Preliminary Amendment Request (PAR), PAR-16-009, Revision 1 (R1), to minimize further construction delays for Unit 3 during the NRC's evaluation of the related License Amendment Request (LAR). The determination of whether the NRC has any objection to SNC proceeding with construction based on the proposed plant licensing basis changes identified in the LAR is requested on or before June 30, 2016. Construction of VEGP Unit 3 seismic Category I module CA20 containing floors subject to the changes proposed in LAR-16-009 is currently on hold and delayed determination regarding this PAR will result in continued delay in the construction completion of VEGP Unit 3 structures.

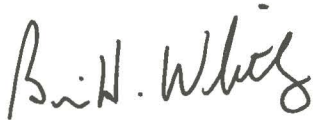
A description of the proposed change and the reason for the change are contained in the Enclosure to this letter. This PAR has been developed in accordance with guidance provided in the most recent revision to the Interim Staff Guidance on Changes during Construction Under 10 CFR Part 52, COL-ISG-25 [ML15058A377] and corresponds accurately and technically with the above-mentioned LAR-16-009. The CA20 module, portions of which are covered in this PAR request, does not contain finned floors. Thus, this requested PAR is based on the technical scope of the submitted LAR that addresses non-finned floors. Section 7 of the Enclosure identifies and details the scope of the "no objection" sought in this PAR.

This letter does not contain any NRC commitments. 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



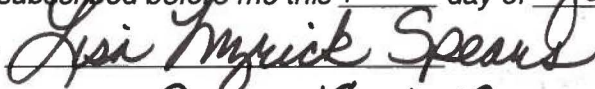
Brian H. Whitley



BHW/ERG/ljs

Sworn to and subscribed before me this 17th day of June 2016

Notary Public:



My commission expires: June 18, 2019

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 – Revised Preliminary
Amendment Request Regarding Structural Design of Auxiliary Building Floors
(PAR-16-009 R1)

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Southern Nuclear Operating Company

ND-16-0895

Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3

**Revised Preliminary Amendment Request
Regarding
Structural Design of Auxiliary Building Floors
(PAR-16-009 R1)**

(This Enclosure consists of 4 pages, including this cover page.)

Pursuant to 10 CFR 52.98(c) and in accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC) submitted a license amendment request (LAR) to change the Vogtle Electric Generating Plant (VEGP), Units 3 and 4, licensing basis documents associated with Combined License Nos. NPF-91 and NPF-92, respectively. Accordingly, SNC requests the determination of whether the NRC has any objection to proceeding with construction of VEGP Unit 3 seismic Category I module CA20 within the auxiliary building containing non-finned floors subject to the changes proposed in LAR-16-009. The subject floors in module CA20 are currently on hold and delayed determination regarding this PAR will result in continued delay in the construction completion of VEGP Unit 3 structures, as identified in the Preliminary Amendment Request (PAR) provided below to be provided by the date shown below.

PAR Request Number: SNC PAR-16-009 R1	Station Name: VEGP	Unit Number(s): <input checked="" type="checkbox"/> 3 <input type="checkbox"/> 4	PAR Request Date: June 17, 2016
1. NRC PAR Notification Requested Date (see Block 7 for basis): June 30, 2016			
2. License Amendment Request References (as applicable): <input checked="" type="checkbox"/> LAR submittal date and SNC Correspondence Number: June 14, 2016 / ND-16-0816 <input type="checkbox"/> Expected LAR submittal date: _____			
3. Brief Description of Proposed Change: <p>Changes are proposed (in the associated License Amendment Request (LAR)) to the Updated Final Safety Analysis Report (UFSAR) descriptions and figures to address changes in the structural design of concrete on steel plate floors in the auxiliary building.</p> <p>The UFSAR text, table, and figures that are proposed to be changed provide information for these floors and are identified as Tier 2* information or as changes in Tier 2 information that are related to involved Tier 2* information. Changes include proposed modifications specific to the Main Control Room ceiling critical section, as well as additional clarification to define how similar finned floors and similar concrete on steel plate floors without fins can be different in the design details. Variations in the detail design, which include information such as size and spacing of reinforcement in the floors and the spans of the floors, are the result of variations in the geometry of the floors and variations in the loads for which the floors are designed. The floor designs with the design variations satisfy design code requirements in American Concrete Institute (ACI) 349 and American Institute of Steel Construction (AISC) N690. Changes are also proposed to UFSAR Figure 3H.5-9, Sheet 2, showing the connection of the finned floor to the supporting wall to change the representation of the reinforcement in the connection. These changes were identified as part of design finalization and satisfy design code requirements. Notes are added to the figure to identify variances in the design.</p> <p>These clarifications provide additional details on the use of the code requirements for the connection design. This activity changes the description for the floors in the auxiliary building by specifying requirements for length of the connecting dowel and capacity of the shear studs. The connection length requirements use the ACI 349 requirements for splice length.</p>			
4. Reason for License Amendment Request: <p>The changes requested by the proposed LAR that impact the non-finned floors are discussed below.</p> <p>The floor slab shown in UFSAR Figure 3H.5-9 is a critical section figure that is representative of</p>			

other sections that use fins to stiffen the floor. Design finalization of locations that use this floor design shows that the size and spacing of the reinforcement at other locations will vary from that shown in the figure. UFSAR text and the figure need to be changed to reflect the variation. The figure shows a floor to wall connection including reinforcement dowels connected to the wall and shear studs attached to the steel plate on the bottom of the floor. The figure shows the required length of the dowel for the critical section but the design criteria for the length is not discussed or identified. At locations other than the critical sections the length of the dowel extending into the concrete will vary. Criteria are provided to address the allowed variations. This change is relevant to non-finned floors as the applicable UFSAR discussion of non-finned floors references the above finned floor Figure. (LAR Change Activities 1 and 5)

In some locations in the auxiliary building, including module CA20, concrete on steel plate construction without fins is used for floors. As with the finned floors, the steel plates have shear studs welded to the top surface of the plate extending into the concrete and the steel plate provides the bottom layer of reinforcement. The floor is connected to the wall with reinforcing bar dowels located below the elevation of the top of the shear studs. The dowels are connected to standard hooks or headed reinforcement in the walls. (LAR Change Activities 1 and 6)

The description of these concrete on steel plate floors without fins is included in the last paragraph of UFSAR Subsection 3.8.4.4.1 and refers to the design methodology for finned floors as described in UFSAR Subsection 3H.5.4. The description of the floors does not specify the design requirements for the connection of the floor to the wall. The connection design of dowels extending into a matrix of shear studs satisfies requirements for development length and splice length in ACI 349. The connection requirements use the ACI 349 requirements for length of the dowels. (LAR Change Activities 1 and 6)

Specifying the appropriate code provisions for development length and splice length that apply to the connection design will clarify the application of ACI 349 requirements. The description in UFSAR Subsection 3.8.4.4.1 also includes an inappropriate reference to control room ceiling and stiffeners. (LAR Change Activities 1 and 6)

The applicability of the design changes for the finned floors of the auxiliary building floor-to-wall connections in other locations within the auxiliary building, i.e. the CA20 module floors, was only recently recognized. A discussion of the capability of the floors to resist bending loads as described in the above mentioned UFSAR Subsection 3.8.4.4.1 indicates that "[t]his methodology" (which is therein identified for both the non-finned floors and the finned floors) "is described for the control room ceiling in UFSAR Subsection 3H.5.4." As indicated, this impact to the CA20 (non-finned) floors was only recently recognized, leading to the need for this PAR.

5. Is Exemption Request Required? ☐ Yes ☒ No

If Yes, Briefly Describe the Reason for the Exemption. Not Applicable

6. Identify Applicable Precedents: No precedence identified.

7. Impact of Change on Installation and Testing Schedules:

SNC's requested date for approval of this license amendment as identified in the referenced LAR is October 17, 2016. This date is based upon the construction of the finned floors at design elevations of approximately 117'-6" and 135'-3". However, the impacted non-finned floors at a design elevation of approximately 82'-6" as part of CA20 are staged and ready to set, but are currently placed in a "construction hold" status.

As such, this PAR requests a "no objection" finding related to this license amendment request Change Activities 1, 5, and 6 by the date identified in Block 1 above (or sooner if reasonably achievable) to allow for appropriate notifications and release of CA20 activities at approximate elevation 82'-6" currently under the "construction hold" status to allow construction to continue.

This “no objection” finding would be specifically applicable to the Unit 3 Room 12262 “Piping/Valve Room” and adjacent hallway floors at a design elevation of approximately 82'-6". This area is shown in UFSAR Figure 1.2-5, Figure 3.8.4-4 (Sheet 2 of 5), and Figure 3.8.4-4 (Sheet 5 of 5); column lines J-1 to J-2 and column lines 2 to 4 bound the requested floor area

Specifically, SNC requests a “no objection” finding to begin completion of these identified floor to wall connections at approximately 82'-6" in Unit 3 auxiliary building structural module CA20 (including the pouring of concrete) in accordance with the design changes proposed in the revised UFSAR description in LAR-16-009.

A “no objection” finding for the above activities would release the associated Unit 3 construction holds for these floors related to this construction activity.

8. **Impact of Change on ITAAC:** None

9. **Additional Information:** None