

Vogle PEmails

From: Patel, Chandu
Sent: Tuesday, December 06, 2016 9:24 AM
To: Chamberlain, Amy Christine; 'Sparkman, Wesley A.' (WASPARKM@southernco.com)
Cc: Vogle PEmails
Subject: RAI Letter 11 for Vogle 3 and 4 COLA IAR Process (LAR 16-015)
Attachments: VOG-RAI-LTR-11.docx

Hi,

Please see attached request for information for Vogle Units 3 and 4 license amendment request 16-015 related to interim amendment request process.

Sincerely,
Chandu Patel, Senior Project Manager
U.S. NRC, Office of New Reactors
NRC/NRO/DNRL/LB4,
Washington, DC 20555-0001
301.415.3025
MS T6C20M

Hearing Identifier: Vogtle_COL_Docs_Public
Email Number: 64

Mail Envelope Properties (e0d390e5bdb540d8a1dedaf4e467373b)

Subject: RAI Letter 11 for Vogtle 3 and 4 COLA IAR Process (LAR 16-015)
Sent Date: 12/6/2016 9:23:48 AM
Received Date: 12/6/2016 9:23:49 AM
From: Patel, Chandu

Created By: Chandu.Patel@nrc.gov

Recipients:

"Vogtle PEmails" <Vogtle.PEmails@nrc.gov>

Tracking Status: None

"Chamberlain, Amy Christine" <ACCHAMBE@southernco.com>

Tracking Status: None

"Sparkman, Wesley A." (WASPARKM@southernco.com) <WASPARKM@southernco.com>

Tracking Status: None

Post Office: HQPWMSMRS05.nrc.gov

Files	Size	Date & Time
MESSAGE	348	12/6/2016 9:23:49 AM
VOG-RAI-LTR-11.docx	36901	

Options

Priority: Standard

Return Notification: No

Reply Requested: No

Sensitivity: Normal

Expiration Date:

Recipients Received:

December 06, 2016

Mr. B. H. Whitley, Director
Regulatory Affairs
Southern Nuclear Operating Company, Inc.
42 Inverness Center Parkway, B022
Birmingham, AL 35242

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 11 RELATED TO
ADDITION OF INTERIM AMENDMENT REQUEST PROCESS FOR THE VOGTLE
ELECTRIC GENERATING PLANT UNITS 3 AND 4 COMBINED LICENSES (TAC
NO. RP9532)

Dear Mr. Whitley:

By letter dated July 29, 2016, (ADAMS Accession NO. ML16211A436), Southern Nuclear Operating Company (SNC) requested an amendment to Combined License (COL) Numbers NPF-91 and NPF-92 for Vogtle Electric Generating Plant (VEGP) Units 3 and 4 respectively. The proposed amendment will add an interim amendment request process to License Condition 2.D.(1) of VEGP Units 3 and 4 COLs.

In the course of reviewing your request the NRC staff has identified the need for additional information. The request for additional information (RAI) is enclosed. Please respond to this RAI within 30 days of receipt of this letter.

If you have any questions or comments concerning this matter, you may contact me at 301-415-3025 or chandu.patel@nrc.gov.

Sincerely,

Chandu P. Patel, Senior Project Manager
Licensing Branch 4
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-025
52-026

Enclosure:
Request for Additional Information 11

CC: see next page

December 06, 2016

Mr. B. H. Whitley, Director
Regulatory Affairs
Southern Nuclear Operating Company, Inc.
42 Inverness Center Parkway, B022
Birmingham, AL 35242

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 11 RELATED TO
ADDITION OF INTERIM AMENDMENT REQUEST PROCESS FOR THE VOGTLE
ELECTRIC GENERATING PLANT UNITS 3 AND 4 COMBINED LICENSES (TAC
NO. RP9532)

Dear Mr. Whitley:

By letter dated July 29, 2016, (ADAMS Accession NO. ML16211A436), Southern Nuclear Operating Company (SNC) requested an amendment to Combined License (COL) Numbers NPF-91 and NPF-92 for Vogtle Electric Generating Plant (VEGP) Units 3 and 4 respectively. The proposed amendment will add an interim amendment request process to License Condition 2.D.(1) of VEGP Units 3 and 4 COLs.

In the course of reviewing your request the NRC staff has identified the need for additional information. The request for additional information (RAI) is enclosed. Please respond to this RAI within 30 days of receipt of this letter.

If you have any questions or comments concerning this matter, you may contact me at 301-415-3025 or chandupatel@nrc.gov.

Sincerely,

/RA/

Chandu P. Patel, Senior Project Manager
Licensing Branch 4
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-025
52-026

Enclosure:
Request for Additional Information 11

Distribution:

Public	PMoulding	RidsNroDnrILb4	JDixon-Herrity
	RidsOgcMailCenter	RidsRgn2MailCenter	RidsAcrsAcnwMailCenter

OFFICE	DNRL/LB4PM
NAME	CPatel
DATE	12/06/2016

*Approval captured electronically in the electronic RAI system.

OFFICIAL RECORD COPY

Request for Additional Information 11

Issue Date: 12/06/2016

Application Title: VEGP Units 3 and 4 – LAR-16-015

Operating Company: Southern Nuclear Operating Co.

Docket No. 52-025 and 52-026

QUESTIONS

Regarding your license amendment request (LAR 15-016) dated July 29, 2016, the NRC requests that Southern Nuclear Corporation (SNC) provide responses to the following questions. Please use as much detail and real examples as possible.

1. Construction Experience

(a) Provide examples of specific instances during the current construction activities for the Vogtle units when the proposed interim amendment request (IAR) process could have been utilized as contrasted to the use of the Preliminary Amendment Request (PAR) process.

(b) Describe from a safety perspective why it would have been advantageous to utilize the IAR process instead of the PAR process.

(c) Provide details about what unnecessary regulatory burdens may have been present under the PAR process versus the proposed IAR process.

(d) Explain how the proposed IAR process would impact recordkeeping, quality assurance and inspections/inspectability.

2. Emergent Conditions

(a) Define “emergent conditions” under the IAR process and explain how SNC would assess that emergent conditions exist.

(b) Explain the safety advantages of recognizing these emergent conditions as part of the staff’s assessment of Nuclear Construction Safety Assessment (NCSA).

3. What do you mean when you say on page 3 of 11 that there are emergent conditions and that the work activity cannot be adjusted? What are the standards by which the licensee will judge that the work activity cannot be adjusted? In addition, please explain why the exigent circumstances detailed in 50.91 would not be appropriate to deal with such a situation (the staff notes that it approved an LAR under exigent circumstances early in the construction of Vogtle Units 3 and 4).

4. In proposed license condition 2.D(1)(e) regarding the content of the NCSA, the licensee is to evaluate whether the continued construction would make the nonconforming

condition irreversible. What are the standards by which the licensee would assess irreversibility? What if the work would be deemed irreversible? How would the licensee disposition such a situation when the work would be irreversible and the NRC did not approve the LAR?

5. SNC has stated that an IAR would include all of the items listed in proposed license condition 2.D(1)(d) and (e). Please explain the difference in scope and depth of the content of the NCSA and the eventual LAR. What information would not be available to the licensee, the public, and NRC staff at the time an IAR is commenced and before the LAR is submitted? With that difference in information in mind, how can the licensee or the NRC staff come to a conclusion that there would be no objection to proceeding with the work that was not done in accordance with the licensing basis?
6. What is the typical time it takes from identification of a nonconformance to submission of an LAR? Good examples to highlight this issue may be the mechanical coupler weld issue/LARs and the embed plate issue which were identified as nonconformances and that took many months to resolve and to submit the LARs to the NRC staff.
7. Please explain what is meant on page 5 of 11 as "prompt notification" to the NRC of use of the IAR process. What form would this notification take?
8. What are the proposed requirements for the tie to the associated LAR/PAR? Would the LAR have to be accepted in order to move from the IAR process to the LAR/PAR process? Would the no objection letter for the PAR have to be issued to satisfy that requirement or would mere submission of the LAR/PAR be enough?
9. Please explain how the public will be informed of and could participate in the IAR process to the same extent that it can now participate in the LAR/PAR process. It appears that the public will not have the opportunity to provide comments and petitions to intervene on the IAR and not until after the changes are already implemented. Does this proposal decrease the ability of the public to participate as compared to the current process?