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Docket Nos.: 52-025  
52-026

ND-17-0028  
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:  
Classification of Nonsafety-Related Instrumentation (LAR-16-029S1)

Ladies and Gentlemen:

Pursuant to 10 CFR 52.98(c) and 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-16-2448, dated December 16, 2016 [ADAMS Accession Number ML16351A483]. This license amendment request (LAR), LAR-16-029, proposed changes to Tier 2 information in the Updated Final Safety Analysis Report (UFSAR) to address the seismic Category and AP1000 equipment class of nonsafety-related instrumentation that interfaces with safety-related pressure boundaries.

The proposed changes to the licensing basis documents in SNC letter ND-16-2448, Enclosure 2, page 2 of 2, include the addition of a new second paragraph to UFSAR Section 3.2, Classification of Structures, Components, and Systems, Subsection 3.2.2.8, clarifying the instrumentation and control line interface criteria applicable to nonsafety-related instrumentation that monitors safety-related fluid systems. SNC has identified an editorial error in the first sentence of the proposed UFSAR text, in which the proposed text inappropriately limits the scope of the clarification to nonsafety-related instrumentation that monitors safety-related "Class B or C" fluid systems. However, as identified elsewhere in the LAR text in Enclosure 1 of SNC letter ND-16-2448, nonsafety-related instrumentation may also monitor safety-related Class A fluid systems, provided an appropriate orifice is used such that no nonsafety-related instruments are directly connected to an AP1000 equipment Class A system. In such cases, the tubing and isolation valve are AP1000 equipment Class B.

Enclosure 3 provides revised proposed changes to the licensing basis documents to correct this editorial error by deleting "Class B or C" from the UFSAR change provided in SNC letter ND-16-2448, Enclosure 2. Enclosure 3 replaces the licensing basis markup provided in SNC letter ND-16-2448, Enclosure 2, in its entirety.

The supplemental information provided in this LAR supplement does not impact the scope, technical content, or conclusions of the Technical Evaluation, Regulatory Evaluation (including the Significant Hazards Consideration Determination), or Environmental Considerations of the original LAR provided in letter ND-16-2448, Enclosure 1.

This letter contains no regulatory commitments. This letter has been reviewed and confirmed to not contain security-related information.

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 Ms. Paige Ridgway at (205) 992-7516.

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



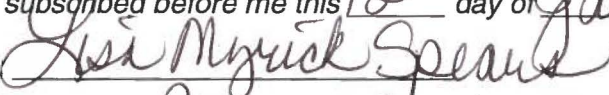
Brian H. Whitley



BHW/NH/ljs

Sworn to and subscribed before me this 12<sup>th</sup> day of January, 2017

Notary Public



My commission expires:

June 18, 2017

Enclosures: 1 & 2) (previously submitted with the original LAR, LAR-16-029, in SNC letter ND-16-2448)

- 3) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Revised Proposed Changes to the Licensing Basis Documents (LAR-16-029S1)

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**Southern Nuclear Operating Company**

**ND-17-0028**

**Enclosure 3**

**Vogtle Electric Generating Plant (VEGP) Units 3 and 4**

**Revised Proposed Changes to the Licensing Basis Documents**

**(LAR-16-029S1)**

**Note:**

Added text is shown as bold **Blue Underline**

(Enclosure 3 consists of two pages, including this cover page.)

**Tier 2 information in UFSAR Section 3.2, Classification of Structures, Components, and Systems, Subsection 3.2.2.8, is revised with the addition of a new second paragraph, as shown below.**

### **3.2.2.8 Instrumentation and Control Line Interface Criteria**

Class C instrumentation, as defined in Subsection 3.2.2.5 have a safety-related equipment class pressure boundary including the sensing line, valves and instrument sensor. The pressure boundary is the same safety-related equipment class as the systems or components it is connected to. Sensing lines connected to the reactor coolant system pressure boundary are Class B if a suitable flow restrictor is provided.

Nonsafety-related instrumentation that monitors safety-related fluid systems is Class D, as defined in Subsection 3.2.2.6. The instrument sensing line is safety-related, seismic Category I from the connected fluid system to the instrument manifold. The instrument, manifold, and impulse line (interconnecting tubing between the manifold and instrument) are Class D, seismic Category II, as defined in Subsection 3.2.1.1.2. The Class D quality requirements include a pressure test at 1.5 times design pressure and a requirement for certified material test reports.

The parts of the sensor, outside the pressure boundary, are designated Class C (1E) if they provide a safety-related function per Subsection 3.2.2.1. They are Class D if the instrument supports Class D functions per Subsection 3.2.2.6. Otherwise the parts are Class E.