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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-522 Revision 0

Ladies and Gentlemen:

By letter dated November 15, 2016, Southern Nuclear Operating Company (SNC) submitted a license amendment request to adopt TSTF-522, Revision 0, "Revise Ventilation System Surveillance Requirements to Operate for 10 hours per Month," for the Vogtle Electric Generating Plant (VEGP), Units 1 and 2. The proposed amendment would modify Technical Specification (TS) Surveillance Requirement (SR) 3.7.10.2 such that each control room emergency filtration (CREFS) train would be required to operate for 15 continuous minutes each month instead of 10 continuous hours each month.

Based on follow-up discussion with the Nuclear Regulatory Commission (NRC) staff, it was requested that SNC provide additional detail regarding the SR 3.7.10.2 requirement to have the heater control circuit energized during this surveillance, and to provide detail regarding how the CREFS heaters are tested. This letter documents the discussion during the teleconference.

The CREFS contains heaters that are controlled by the relative humidity of the air flowing through the system. The heaters automatically turn on at a 70% relative humidity to limit the moisture content of the carbon adsorbers. Operation with the heater control circuit energized is verified by a red light at the filter unit. This provides indication the heater control circuit is available to operate if a signal from the moisture transmitter is received. During the surveillance, the red light ensures that the heaters will operate automatically on a high relative humidity signal when required.

The CREFS heater is also tested per the TS 5.5.11 Ventilation Filter Testing Program (VFTP). Per TS 5.5.11.e, it is required that the heaters for the CREFS dissipate ≥ 95 kW when corrected to 460 V when tested in accordance with ASME N510-1989. This VFTP procedure requires the power to the heaters be de-energized so that maintenance can physically inspect the heater elements for loose connections, damaged parts, damaged insulation, and missing parts. Continuity and resistance from phase to ground for each phase on all 3 phases of the heaters is verified. A signal generator is connected to simulate high relative humidity and to cause the SCR master and slave SCR's to turn on the heater (energized). With the heater energized voltage and amp measurements are taken. This data is used to calculate the minimum of 95 KW heat dissipation when the voltage is corrected to 460 V. TS SR 3.7.10.3 also requires CREFS filter testing in accordance with the Ventilation Filter Testing Program

(VFTP) which includes CREFS heaters. In addition to the electrical test, temperature measurements are taken to ensure temperature rise in the air stream with the heaters energized per ASME N510-1989. VEGP operating experience has shown the CREFS heaters to be reliable.

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/GKM/GLS

Sworn to and subscribed before me this 13 day of January, 2017.

Laura L. Croft
Notary Public

My commission expires: 10-8-2017

cc: Southern Nuclear Operating Company
Mr. S. E. Kuczynski, Chairman, President & CEO
Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer
Mr. D. R. Madison, Vice President – Fleet Operations
Mr. M. D. Meier, Vice President – Regulatory Affairs
Mr. B. K. Taber, Vice President – Vogtle 1 & 2
Mr. B. J. Adams, Vice President – Engineering
Mr. D. D. Sutton, Regulatory Affairs Manager – Vogtle 1 & 2
RType: CVC7000

U. S. Nuclear Regulatory Commission
Ms. C. Haney, Regional Administrator
Mr. M. D. Orenak, NRR Senior Project Manager – Vogtle 1 & 2
Mr. M. F. Endress, Senior Resident Inspector – Vogtle 1 & 2

State of Georgia
Mr. R. E. Dunn, Director- Environmental Protection Division