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Docket Nos.: 52-025
52-026

ND-17-2054
10 CFR 50.90
10 CFR 52.98

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

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4
Preliminary Amendment Request (PAR):
Use of ASME NB-3200 for Piping Component Analysis (PAR-17-035)

Ladies and Gentlemen:

The U.S. Nuclear Regulatory Commission (NRC) issued the Vogtle Electric Generating Plant (VEGP) Units 3 and 4 combined licenses (COLs) (License Numbers NPF-91 and NPF-92, respectively) to Southern Nuclear Operating Company (SNC) on February 12, 2012.

SNC submitted a License Amendment Request (LAR)-17-035 on September 22, 2017, by SNC letter ND-17-1583 [ML17265A787]. The LAR proposes to depart from UFSAR Tier 2* information regarding design by rule evaluations for Class 1 piping component analysis as described in ASME Section III, NB-3600 to also include the ability to perform design by analysis evaluations, as described in ASME Section III, NB-3200.

SNC is submitting a Preliminary Amendment Request (PAR)-17-035, to avoid possible delays in completing installation of the pressurizer surge line piping. The determination of whether the NRC has any objection to SNC proceeding with the proposed plant licensing basis changes is needed on or before January 19, 2018.

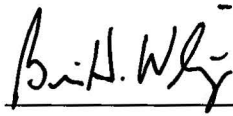
A description of the requested change and the reason for the change are contained in Enclosure 1 to this letter. This PAR has been developed in accordance with guidance provided in the most recent revision to the Interim Staff Guidance on Changes during Construction Under 10 CFR Part 52, COL-ISG-25 [ADAMS Accession Number ML13045A125], and corresponds accurately and technically with the above-mentioned LAR-17-035. The technical scope of this PAR is consistent with the technical scope of the submitted LAR. Section 7 of Enclosure 1 identifies the scope of the "no objection" sought in this PAR.

This letter does not contain any NRC commitments. This letter has been reviewed and confirmed to not contain security-related information.

Should you have any questions, please contact Mr. Corey Thomas at (205) 992-5221.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 13th of December, 2017.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Brian H. Whitley", is written over a horizontal line.

Brian H. Whitley
Director, Regulatory Affairs
Southern Nuclear Operating Company

Enclosure 1: Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Preliminary Amendment
Request: Use of ASME NB-3200 for Piping Component Analysis (PAR-17-035)

cc:

Southern Nuclear Operating Company / Georgia Power Company

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Southern Nuclear Operating Company

ND-17-2054

Enclosure 1

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

Preliminary Amendment Request:

**Use of ASME NB-3200 for Piping Component Analysis
(PAR-17-035)**

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

Pursuant to 10 CFR 52.98(c) and in accordance with the provisions of 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 the installation of the pressurizer surge line piping with respect to the proposed changes to the design by rule evaluation of the Class 1 piping components identified below.

Installation of the pressurizer surge line piping is subject to the changes proposed in LAR-17-035. Delayed determination regarding this Preliminary Amendment Request (PAR) could result in the delay of the installation of this piping. Accordingly, SNC requests the determination of whether the NRC has any objection to the installation of the pressurizer surge line piping with respect to the proposed changes identified below.

PAR Request Number: SNC PAR-17-035	Station Name: VEGP	Unit Number(s): <input checked="" type="checkbox"/> 3 <input checked="" type="checkbox"/> 4	PAR Request Date: December 13, 2017
1. NRC PAR Notification Requested Date (see Block 7 for basis): January 19, 2018			
2. License Amendment Request References (as applicable): <input checked="" type="checkbox"/> LAR submittal date and SNC Correspondence Number: LAR-17-035 – September 22, 2017 / ND-17-1583 <input type="checkbox"/> Expected LAR submittal date:			
3. Brief Description of Proposed Change: The proposed amendment revises plant-specific Design Control Document (DCD) Tier 2* and associated Tier 2 material that is incorporated into the Updated Final Safety Analysis Report (UFSAR) related to Class 1 piping design. This amendment request proposes to modify the licensing requirements for the design by rule evaluations of ASME Class 1 Piping component analysis as described in ASME Section III, NB-3600 to also include the ability to perform design by analysis evaluations, as described in ASME Section III, NB-3200.			
4. Reason for License Amendment Request: Currently, the Class 1 piping component analyses in the AP1000 design implemented at Vogtle Units 3 and 4 use the “design by rule” methods of ASME Section III, NB-3600 to evaluate stress and fatigue for each service level. However, there are instances when the simplified analysis results do not satisfy the requirements of ASME Section III, NB-3600. In these instances, ASME Section III, NB-3630(c) states, “ <i>When a design does not satisfy the requirements of NB-3640 and NB-3650, the more detailed alternative analysis given in NB-3200...may be used.</i> ” In order to complete the outstanding analysis and address any future issues that may arise during as-built reconciliation, UFSAR Tables 3.9-6, 3.9-9, and 3.9-11 are modified to clarify the ability to use ASME Section III, NB-3200, when the simplified requirements of ASME Section III, NB-3600 cannot be met. The proposed changes evaluated in LAR-17-035 are limited to ASME Class 1 “as designed” piping component design that requires the use of design by analysis evaluation. The revised licensing basis			

will allow piping analyses that require a more detailed evaluation to demonstrate acceptability to ASME Section III, NB-3200 requirements.
5. Is Exemption Request Required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Briefly Describe the Reason for the Exemption. Not Applicable.
6. Identify Applicable Precedents: No precedents identified.
7. Impact of Change on Installation and Testing Schedules: Completion of this activity will be used to support installation of the pressurizer surge line piping. The pressurizer piping design is planned to be performed consistent with the proposed changes to the licensing basis proposed in LAR-17-035 using design by analysis evaluation, consistent with ASME Section III NB-3200. Installation of the pressurizer surge line piping is dependent on the licensing basis changes as identified in LAR-17-035. The scope of the "no objection" sought by this PAR is installation of the pressurizer surge line piping that is designed in accordance with ASME Section III NB-3200 and is consistent with the proposed changes requested in LAR-17-035. Since installation of the pressurizer surge line piping is scheduled soon, the Licensee requests a determination on whether the NRC has any objection to SNC proceeding with installation in accordance with the proposed licensing basis changes. A "no-objection" finding related to the PAR by the date identified in Block 1 above (or sooner if reasonably achievable) would allow for VEGP Unit 3 installation of the pressurizer surge line to proceed.
8. Impact of Change on ITAAC: None. It is noted that the fatigue evaluation for the pressurizer surge line will be available for review during the piping DAC inspection scheduled for the week of January 29, 2018.
9. Additional Information: None