



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 7, 2018

Mr. James J. Hutto
Regulatory Affairs Director
Southern Nuclear Operating Company, Inc.
P. O. Box 1295, Bin - 038
Birmingham, AL 35201-1295

SUBJECT: VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2, ISSUANCE OF
AMENDMENT NOS. 194 AND 177 REGARDING CHANGES TO
SURVEILLANCE REQUIREMENT 3.3.1.3 (CAC NOS. MF9745 AND MF9746;
EPID L-2017-LLA-0231)

Dear Mr. Hutto:

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 194 to Renewed Facility Operating License NPF-68 and Amendment No. 177 to Renewed Facility Operating License NPF-81 for the Vogtle Electric Generating Plant, Units 1 and 2, respectively. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated May 24, 2017, as supplemented by letter dated August 17, 2017.

The amendments revise TS Surveillance Requirement (SR) 3.3.1.3, "Reactor Trip System (RTS) Instrumentation". Specifically, the NOTE in SR 3.3.1.3 was proposed to be revised from "Not required to be performed until 24 hours after THERMAL POWER is \geq 15% RTP [rated thermal power]" to "Not required to be performed until 24 hours after THERMAL POWER is \geq 50% RTP".

A copy of the related Safety Evaluation is also enclosed. A Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael Orenak", followed by a small "for" written above the line.

Michael Orenak, Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-424 and 50-425

Enclosures:

1. Amendment No. 194 to NPF-68
2. Amendment No. 177 to NPF-81
3. Safety Evaluation

cc w/encls: Distribution via Listserv



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SOUTHERN NUCLEAR OPERATING COMPANY, INC.

GEORGIA POWER COMPANY

OGLETHORPE POWER CORPORATION

MUNICIPAL ELECTRIC AUTHORITY OF GEORGIA

CITY OF DALTON, GEORGIA

DOCKET NO. 50-424

VOGTLE ELECTRIC GENERATING PLANT, UNIT 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 194
Renewed License No. NPF-68

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment to the Vogtle Electric Generating Plant, Unit 1 (the facility) Renewed Facility Operating License No. NPF-68 filed by the Southern Nuclear Operating Company, Inc. (the licensee), acting for itself, Georgia Power Company, Oglethorpe Power Corporation, Municipal Electric Authority of Georgia, and City of Dalton, Georgia (the owners), dated May 24, 2017, as supplemented by letter dated August 17, 2017, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations as set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

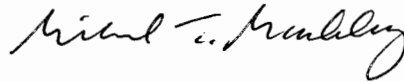
2. Accordingly, the license is hereby amended by page changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-68 is hereby amended to read as follows:

Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 194, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated into this license. Southern Nuclear shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Michael T. Markley, Chief
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to License No. NPF-68
and the Technical Specifications

Date of Issuance: February 7, 2018



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SOUTHERN NUCLEAR OPERATING COMPANY, INC.

GEORGIA POWER COMPANY

OGLETHORPE POWER CORPORATION

MUNICIPAL ELECTRIC AUTHORITY OF GEORGIA

CITY OF DALTON, GEORGIA

DOCKET NO. 50-425

VOGTLE ELECTRIC GENERATING PLANT, UNIT 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 177
Renewed License No. NPF-81

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment to the Vogtle Electric Generating Plant, Unit 2 (the facility) Renewed Facility Operating License No. NPF-81 filed by the Southern Nuclear Operating Company, Inc. (the licensee), acting for itself, Georgia Power Company Oglethorpe Power Corporation, Municipal Electric Authority of Georgia, and City of Dalton, Georgia (the owners), dated May 24, 2017, as supplemented by letter dated August 17, 2017, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations as set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

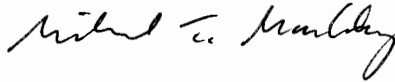
2. Accordingly, the license is hereby amended by page changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-81 is hereby amended to read as follows:

Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 177, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated into this license. Southern Nuclear shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Michael T. Markley, Chief
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to License No. NPF-81
and the Technical Specifications

Date of Issuance: February 7, 2018

ATTACHMENT

VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2

TO LICENSE AMENDMENT NO. 194

RENEWED FACILITY OPERATING LICENSE NO. NPF-68

DOCKET NO. 50-424

AND

TO LICENSE AMENDMENT NO. 177

RENEWED FACILITY OPERATING LICENSE NO. NPF-81

DOCKET NO. 50-425

Replace the following pages of the Licenses and the Appendix A Technical Specifications (TSs) with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove Pages

License

License No. NPF-68, page 4

License No. NPF-81, page 3

TSs

3.3.1-9

Insert Pages

License

License No. NPF-68, page 4

License No. NPF-81, page 3

TSs

3.3.1-9

(1) Maximum Power Level

Southern Nuclear is authorized to operate the facility at reactor core power levels not in excess of 3625.6 megawatts thermal (100 percent power) in accordance with the conditions specified herein.

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 194, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated into this license. Southern Nuclear shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

(3) Southern Nuclear Operating Company shall be capable of establishing containment hydrogen monitoring within 90 minutes of initiating safety injection following a loss of coolant accident.

(4) Deleted

(5) Deleted

(6) Deleted

(7) Deleted

(8) Deleted

(9) Deleted

(10) Mitigation Strategy License Condition

The licensee shall develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

(a) Fire fighting response strategy with the following elements:

1. Pre-defined coordinated fire response strategy and guidance
2. Assessment of mutual aid fire fighting assets
3. Designated staging areas for equipment and materials
4. Command and control
5. Training and response personnel

(b) Operations to mitigate fuel damage considering the following:

1. Protection and use of personnel assets
2. Communications
3. Minimizing fire spread
4. Procedures for Implementing integrated fire response strategy
5. Identification of readily-available pre-staged equipment
6. Training on integrated fire response strategy

- (2) Georgia Power Company, Oglethorpe Power Corporation, Municipal Electric Authority of Georgia, and City of Dalton, Georgia, pursuant to the Act and 10 CFR Part 50, to possess but not operate the facility at the designated location in Burke County, Georgia, in accordance with the procedures and limitations set forth in this license;
- (3) Southern Nuclear, pursuant to the Act and 10 CFR Part 70, to receive, possess, and use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Final Safety Analysis Report, as supplemented and amended;
- (4) Southern Nuclear, pursuant to the Act and 10 CFR Parts 30, 40, and 70 to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
- (5) Southern Nuclear, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components;
- (6) Southern Nuclear, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility authorized herein.

C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter 1 and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect, and is subject to the additional conditions specified or incorporated below.

(1) Maximum Power Level

Southern Nuclear is authorized to operate the facility at reactor core power levels not in excess of 3625.6 megawatts thermal (100 percent power) in accordance with the conditions specified herein.

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 177, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated into this license. Southern Nuclear shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

The Surveillance requirements (SRs) contained in the Appendix A Technical Specifications and listed below are not required to be performed immediately upon implementation of Amendment No. 74. The SRs listed below shall be

SURVEILLANCE REQUIREMENTS

NOTE

Refer to Table 3.3.1-1 to determine which SRs apply for each RTS Function.

SURVEILLANCE		FREQUENCY
SR 3.3.1.1	Perform CHANNEL CHECK.	In accordance with the Surveillance Frequency Control Program
SR 3.3.1.2	<p>-----NOTES-----</p> <p>Not required to be performed until 12 hours after THERMAL POWER is $\geq 15\%$ RTP.</p> <p>-----</p> <p>Compare results of calorimetric heat balance calculation to power range channel output. Adjust power range channel output if calorimetric heat balance calculation results exceed power range channel output by more than $+2\%$ RTP.</p>	In accordance with the Surveillance Frequency Control Program
SR 3.3.1.3	<p>-----NOTES-----</p> <p>Not required to be performed until 24 hours after THERMAL POWER is $\geq 50\%$ RTP.</p> <p>-----</p> <p>Compare results of the incore detector measurements to Nuclear Instrumentation System (NIS) AFD. Adjust NIS channel if absolute difference is $\geq 3\%$.</p>	In accordance with the Surveillance Frequency Control Program

(continued)



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO

AMENDMENT NO. 194 TO RENEWED FACILITY OPERATING LICENSE NPF-68

AND

AMENDMENT NO. 177 TO RENEWED FACILITY OPERATING LICENSE NPF-81

SOUTHERN NUCLEAR OPERATING COMPANY, INC.

VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2

DOCKET NOS. 50-424 AND 50-425

1.0 INTRODUCTION

By application dated May 24, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17144A408), as supplemented by letter dated August 17, 2017 (ADAMS Accession No. ML17229B574), Southern Nuclear Operating Company, Inc. (SNC, the licensee), requested changes to the technical specifications (TSs) for the Vogtle Electric Generating Plant, Units 1 and 2 (VEGP). The supplement dated August 17, 2017, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the staff's original proposed no significant hazards consideration determination as published the *Federal Register* on July 18, 2017 (82 FR 32883).

The proposed changes would revise the VEGP TS surveillance requirement (SR) 3.3.1.3, "Reactor Trip System (RTS) Instrumentation". Specifically, the NOTE in SR 3.3.1.3 was proposed to be revised from "Not required to be performed until 24 hours after THERMAL POWER is \geq 15% RTP [rated thermal power]" to "Not required to be performed until 24 hours after THERMAL POWER is \geq 50% RTP".

2.0 REGULATORY EVALUATION

2.1 Surveillance Requirement Description

The SR 3.3.1.3 verifies the accuracy of the Axial Flux Difference (AFD) input to the reactor trip system as well as the indication of AFD for satisfying VEGP TS 3.2.3, "Axial Flux Difference (AFD) (Relaxed Axial Offset Control (RAOC) Methodology)".

2.2 Proposed Changes

The NOTE in the current SR 3.3.1.3 states:

Not required to be performed until 24 hours after THERMAL POWER is \geq 15% RTP

The NOTE in SR 3.3.1.3 is proposed to state:

Not required to be performed until 24 hours after THERMAL POWER is \geq 50% RTP

2.3 Applicable Regulations

Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50.36, TSs, establishes the requirements for TSs. Specifically, 10 CFR 50.36(c)(3), SRs, states that:

Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operations will be met.

General Design Criterion (GDC) 10, "Reactor Design," of Appendix A to 10 CFR Part 50 states that:

The reactor core and associated coolant, control, and protection systems shall be designed with appropriate margin to assure that specified acceptable fuel design limits are not exceeded during any condition of normal operation, including the effects of anticipated operational occurrences.

GDC 20, "Protection system functions," states that:

The [reactor] protection system shall be designed (1) to initiate automatically the operation of appropriate systems including the reactivity control systems, to assure that specified acceptable fuel design limits are not exceeded as a result of anticipated operational occurrences and (2) to sense accident conditions and to initiate the operation of systems and components important to safety.

3.0 TECHNICAL EVALUATION

The performance of SR 3.3.1.3 requires taking a flux map of the reactor core to obtain the incore AFD, comparing it to the indicated AFD based on the nuclear instrumentation (excore AFD), and then adjusting the instrument channel if the acceptance criterion is not met. To obtain meaningful incore measurements, the flux maps are obtained at sufficiently high power levels (typically, 30 percent RTP following a fueling outage). The activities required to successfully perform SR 3.3.1.3 include: raising power to approximately 30 percent RTP; placing the turbine generator on-line; stabilizing reactor power; obtaining a flux map, performing SR 3.3.1.3 to determine if the AFD channels meet the acceptance criterion; and preparing the information to complete any adjustments, if necessary. The licensee stated "if adjustment of the instrument channels is required, the remainder of the 24-hr time limit is restrictive and poses challenges to completing the SR. The only way to avoid this is to remain below 15% [percent]

RTP to perform this SR. However, plant conditions at such a low power level are not well suited for obtaining meaningful measurements.”

At VEGP, there are four excore detectors (external to the core) used to measure AFD. The AFD signals are used to monitor the flux and power in the four core quadrants and provide control room indication of AFD and quadrant power tilt ratio to satisfy TS 3.2.3, and TS 3.2.4, “Quadrant Power Tilt Ratio,” respectively.

The threshold power of 15 percent RTP for performing SR 3.3.1.3 is based on the original VEGP TS where the AFD specification applicability (TS 3/4.2.1) began at 15 percent RTP. The licensee revised the applicability to Mode 1, above 50 percent RTP, when it revised its AFD specification from constant axial offset control (CAOC) to RAOC. The licensee did not revise the threshold power of 15 percent RTP for performing the surveillance to compare the incore AFD to the indicated core AFD, accordingly. During the conversion to the Improved Technical Specifications (ITS) (i.e., NUREG-1431, Revision 1 “Standard Technical Specifications for Westinghouse Plants,” (ADAMS Accession No. ML13196A405) that was approved on September 25, 1996 (ADAMS Accession No. ML012390239), the SR 3.3.1.3 NOTE retained the 15 percent RTP threshold and added the time requirement of 24 hours. The ITS SR 3.3.1.3 does not differentiate between plants using RAOC AFD control versus plants using CAOC control. During the conversion to ITS, the licensee moved the AFD specification (pre-ITS 3/4.2.1) to TS 3.2.3. For the case of RAOC AFD control in TS 3.2.3, AFD limits are not applicable below 50 percent RTP. The NRC staff determined that revising the requirement in the NOTE in SR 3.3.1.3 to “Not required to be performed until 24 hour after THERMAL power is $\geq 50\%$ RTP” is consistent with the power level at which AFD control is required by TS 3.2.3.

The VEGP core operating limit report establishes limits on the values of the AFD to limit the amount of axial power distribution skewing to either the top or bottom of the reactor core and TS 3.2.3 enforces those limits. By limiting the amount of power distribution skewing, reactor core peaking factors are consistent with the assumptions used in the safety analyses in Chapter 15 of the Updated Final Safety Analysis Report (UFSAR) (ADAMS Accession No. ML17032A132). The AFD values measured by SR 3.3.1.3 ensure the accuracy of the AFD value used to verify that the reactor core satisfies TS 3.2.3. TS 3.2.3 states that the AFD limits are not applicable when the power level is below 50 percent RTP.

Four excore detectors are used to measure AFD, which is an input to the Over Temperature Delta T (OTΔT) reactor trip function. Note 1 of TS Table 3.3.1-1 on TS page 3.3.1-20 lists the equation for calculating the OTΔT setpoint. The term in the equation, $f_1(\text{AFD})$, would reduce the setpoint when the AFD exceeds the values specified in Note 1 of TS Table 3.3.1-1. The SR 3.3.1.3 requires a comparison of the incore AFD to the indicated excore AFD and adjustment of the instrument channel if the acceptance criterion is not met. The surveillance is performed to verify the $f_1(\text{AFD})$ input to the OTΔT reactor trip function. The current NOTE to SR 3.3.1.3 specifies that following a refueling outage, the first performance of this SR is not required until 24 hours after the core power reaches 15 percent RTP. To increase the flexibility of the SR performance, the licensee proposed to increase the threshold power level in the NOTE from 15 percent to 50 percent RTP. The AFD input to the OTΔT reactor trip function is initially calibrated with projected full-power detector currents until plant conditions allow for more accurate measurement of the detector currents and incore AFD. The licensee stated the initial calibration of the AFD input to the OTΔT trip function is sufficient to meet the requirements of the safety analyses until SR 3.3.1.3 is performed.

In its letter dated August 17, 2017, the licensee clarified which analyzed events credited the OTΔT trip function. Of all events, only the rod cluster control assemblies at power (RWAP) event in UFSAR Section 15.4.2, "Uncontrolled Rod Cluster Control Assembly Bank Withdrawal at Power," (ADAMS Accession No. ML17032A143) is analyzed at an initial power level below 50 percent RTP. Additionally, the supplement provided bases addressing adequacy of safety analyses in UFSAR Chapter 15. Function 6 in TS Table 3.3.1-1 requires the OTΔT trip function be operable for Modes 1 and 2. Typically, the OTΔT trip setpoint is reached and the resulting reactor trip occurs when the transient core power exceeds 50 percent RTP, depending upon the transient conditions (including primarily the gradual increase in power by the withdrawing the rod cluster control assemblies, the OTΔT trip setpoint constants, and dynamic compensation terms). Although the transient power could increase to more than 50 percent RTP during a RWAP event, skewed power shapes would not be expected to be worse than at the lower power initial condition where inserted control rods result in a highly bottom-skewed power shape. The supplement also indicated that since adverse axial power shapes that could cause departure from nucleate boiling do not occur below an initial power level of 50 percent RTP, the reset function, $f_1(\text{AFD})$, is not explicitly modeled in the analysis for an event initiated from below 50 percent RTP. Based on the above, the NRC staff finds that the proposed NOTE to SR 3.3.1.3 would have no impact on the results of the analysis discussed in UFSAR Chapter 15 for the events that rely on the OTΔT function for protection.

The NRC staff concludes that (1) the revised threshold power of 50 percent RTP in the NOTE to SR 3.3.1.3 is consistent with the threshold power level at which AFD control is required by TS 3.2.3; (2) the revised SR 3.3.1.3 will assure that the applicable safety analyses in UFSAR Chapter 15 remain valid in meeting the GDC 10 requirement as it is related to the requirement of the fuel rod integrity and GDC 20 as it is related to the requirements of the reactor protection functions, and (3) the revised SR 3.3.1.3 meets 10 CFR 50.36(c)(3) that requires a TS SR to assure that facility operation will be within safety limits, and that the limiting conditions for operations will be met. Therefore, the NRC staff concludes that the proposed NOTE to TS SR 3.3.1.3 is acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Georgia State official was notified of the proposed issuance of the amendments on January 11, 2018. The NRC staff verified that the State official had no comments on January 11, 2018.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to the installation or use of facility components located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (82 FR 32883, July 18, 2018). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: S. Sun, NRR

Date: February 7, 2018

SUBJECT: VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2, ISSUANCE OF
AMENDMENTS REGARDING CHANGES TO SURVEILLANCE REQUIREMENT
3.3.1.3 CAC NOS. MF9745 AND MF9746; EPID L-2017-LLA-0231)
DATED FEBRUARY 7, 2018

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