



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

SAFETY EVALUATION BY THE OFFICE OF NEW REACTORS

RELATED TO AMENDMENT NOS. 113 AND 112

TO THE COMBINED LICENSE NOS. NPF-91 AND NPF-92, RESPECTIVELY

SOUTHERN NUCLEAR OPERATING COMPANY, INC.

GEORGIA POWER COMPANY

OGLETHORPE POWER CORPORATION

MEAG POWER SPVM, LLC

MEAG POWER SPVJ, LLC

MEAG POWER SPVP, LLC

CITY OF DALTON, GEORGIA

VOGTLE ELECTRIC GENERATING PLANT UNITS 3 AND 4

DOCKET NOS. 52-025 AND 52-026

1.0 INTRODUCTION

By letter dated November 16, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17325A562), Southern Nuclear Operating Company, Inc. (SNC) requested that the U.S. Nuclear Regulatory Commission (NRC) amend Vogtle Electric Generating Plant (VEGP) Units 3 and 4, Combined License (COL) Nos. NPF-91 and NPF-92, respectively. The License Amendment Request (LAR) 17-038 requested changes to COL Appendix C and plant-specific design control document (PS-DCD) Tier 1 information to simplify and consolidate a number of Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) to improve the efficiency of the ITAAC completion and closure process.

SNC has also requested an exemption from the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52, Appendix D, "Design Certification Rule for the AP1000 Design," Section III.B, "Scope and Contents." The requested exemption would allow a departure from the corresponding portions of the certified information in Tier 1 of the generic DCD.¹ In order to modify the PS-DCD Tier 1 information, part of the Updated Final Safety Analysis Report (UFSAR), the NRC must find SNC's exemption request included in its submittal for the LAR to

¹ While SNC describes the requested exemption as being from Section III.B of 10 CFR Part 52, Appendix D, the entirety of the exemption pertains to proposed departures from Tier 1 information in the generic DCD. In the remainder of this evaluation, the NRC will refer to the exemption as an exemption from Tier 1 information to match the language of Section VIII.A.4 of 10 CFR Part 52, Appendix D, which specifically governs the granting of exemptions from Tier 1 information.

be acceptable. The staff's review of the exemption request, as well as the LAR, is included in this safety evaluation.

2.0 REGULATORY EVALUATION

10 CFR Part 52, Appendix D, Section VIII.A.4, states that exemptions from Tier 1 information are governed by 10 CFR 52.63(b)(1) and 52.98(f). It also states that the Commission will deny a request for an exemption from Tier 1, if it finds that the design change will result in a significant decrease in the level of safety otherwise provided by the design.

10 CFR 52.63(b)(1) allows a licensee who references a design certification rule to request NRC approval for an exemption from one or more elements of the certification information. The Commission may only grant such a request if it determines that the exemption will comply with the requirements of 10 CFR 52.7, which, in turn, points to the requirements listed in 10 CFR 50.12 for specific exemptions, and the special circumstances present outweigh any decrease in safety that may result from the reduction in standardization caused by the exemption. Therefore, any exemption from the Tier 1 information certified by Appendix D to 10 CFR Part 52 must meet the requirements of Appendix D, Section VIII.A.4 to 10 CFR Part 52, 10 CFR 50.12, 52.7, and 52.63(b)(1).

10 CFR 52.98(f) requires NRC approval for any modification to, addition to, or deletion from the terms and conditions of a COL.

10 CFR 52.97(b) requires that the ITAAC included in the COL be necessary and sufficient to provide reasonable assurance that the facility has been constructed and will be operated in conformity with the license, the Atomic Energy Act of 1954, as amended (AEA), and the Commission's rules and regulations.

3.0 TECHNICAL EVALUATION

3.1 EVALUATION OF EXEMPTION

The Tier 1 information for which a plant-specific departure and exemption was requested includes corresponding changes to COL Appendix C information. The result of this exemption would be that SNC could implement modifications to Tier 1 information described and justified in LAR 17-038 if, and only if, the NRC approves LAR 17-038. This exemption is a permanent exemption limited in scope to the particular Tier 1 information specified. As stated in Section VIII.A.4 of Appendix D to 10 CFR Part 52, an exemption from Tier 1 information is governed by the requirements of 10 CFR 52.63(b)(1) and 52.98(f). Additionally, Section VIII.A.4 of Appendix D to 10 CFR Part 52 provides that the Commission will deny a request for an exemption from Tier 1 if it finds that the requested change will result in a significant decrease in the level of safety otherwise provided by the design. Pursuant to 10 CFR 52.63(b)(1), the Commission may grant exemptions from one or more elements of the certification information, so long as the criteria given in 10 CFR 52.7, which, in turn, references 10 CFR 50.12, are met and that the special circumstances, which are defined by 10 CFR 50.12(a)(2), outweigh any potential decrease in safety due to reduced standardization.

Pursuant to 10 CFR 52.7, the Commission may, upon application by any interested person or upon its own initiative, grant exemptions from the requirements of 10 CFR Part 52. As 10 CFR 52.7 further states, the Commission's consideration will be governed by 10 CFR 50.12, "Specific exemptions," which states that an exemption may be granted when: (1) the exemptions are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security; and (2) special circumstances are present. Specifically, 10 CFR 50.12(a)(2) lists six special circumstances for which an exemption may be considered. It is necessary for one of these special circumstances to be present in order for the NRC to consider granting an exemption request. SNC stated that the requested exemption meets the special circumstances of 10 CFR 50.12(a)(2)(ii). That subparagraph defines special circumstances as when "[a]pplication of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule." The staff's analysis of each of these findings is presented below.

3.1.1 AUTHORIZED BY LAW

This exemption would allow SNC to implement changes to COL Appendix C and corresponding Tier 1 information. This is a permanent exemption limited in scope to particular Tier 1 information evaluated in Section 3.2 of this safety evaluation. Subsequent changes to the Tier 1 Tables discussed in Section 3.2 or any other Tier 1 information, would be subject to the exemption process specified in Section VIII.A.4 of Appendix D to 10 CFR Part 52. As stated above, 10 CFR Part 52, Appendix D, Section VIII.A.4 allows the NRC to grant exemptions from one or more elements of the Tier 1 information. The staff has determined that granting SNC's proposed exemption will not result in a violation of the AEA or the Commission's regulations. Therefore, as required by 10 CFR 50.12(a)(1), the exemption is authorized by law.

3.1.2 NO UNDUE RISK TO PUBLIC HEALTH AND SAFETY

The underlying purpose of Appendix D to 10 CFR Part 52 is to ensure that a licensee will construct and operate the plant based on the approved information found in the DCD incorporated by reference into a licensee's licensing basis. As explained below in Section 3.2 of this safety evaluation, the proposed changes only consolidate existing ITAAC without substantively changing what the existing ITAAC are intended to verify. The changes proposed by SNC do not add, delete, or modify systems or equipment as described in Tier 1 of the AP1000 DCD. These changes will not impact the ability of the structures to perform their design function. Because the changes will not alter the operation of any plant equipment or systems, these changes do not present an undue risk from existing equipment or systems. These changes do not add any new equipment or system interfaces to the current plant design. The description changes do not introduce any new industrial, chemical, or radiological hazards that would represent a public health or safety risk, nor do they modify or remove any design or operational controls or safeguards intended to mitigate any existing on-site hazards. Furthermore, the proposed changes would not allow for a new fission product release path, result in a new fission product barrier failure mode, or create a new sequence of events that would result in significant fuel cladding failures. Accordingly, these changes do not present an undue risk from any new equipment or systems. Therefore, as required by 10 CFR 50.12(a)(1), the staff finds that there is no undue risk to the public health and safety.

3.1.3 CONSISTENT WITH COMMON DEFENSE AND SECURITY

The proposed exemption would allow changes to elements of the PS-DCD Tier 1 that do not substantively change what the existing ITAAC are intended to verify. The changes do not alter or impede the design, function, or operation of any plant structure, system, or component (SSC) associated with the facility's physical or cyber security, and therefore does not affect any plant equipment that is necessary to maintain a safe and secure plant status. In addition, the changes have no impact on plant security or safeguards. Therefore, as required by 10 CFR 50.12(a)(1), the staff finds that the common defense and security is not impacted by this exemption.

3.1.4 SPECIAL CIRCUMSTANCES

Special circumstances, in accordance with 10 CFR 50.12(a)(2)(ii), are present, in part, whenever application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule. The underlying purposes of the Tier 1 information is to ensure that a licensee will safely construct and operate the plant based on the certified information found in the AP1000 DCD, which was incorporated by reference into the VEGP Units 3 and 4 licensing basis. The proposed changes to consolidate and relocate ITAAC maintain the design functions of these systems and do not substantively change what the existing ITAAC are intended to verify. The proposed changes do not impact the ability of any SSC to perform its function or negatively impact safety, as discussed in Section 3.2. Therefore, because the application of the specified Tier 1 information in this circumstance is not necessary to achieve the underlying purpose of the rule, the staff finds that the special circumstances required by 10 CFR 50.12(a)(2)(ii) for the granting of an exemption from the Tier 1 information exist.

3.1.5 SPECIAL CIRCUMSTANCES OUTWEIGH REDUCED STANDARDIZATION

This exemption would allow the implementation of changes to COL Appendix C and corresponding Tier 1 information proposed in LAR 17-038. The changes to the PS-DCD Tier 1 information do not substantively change what the existing ITAAC are intended to verify and do not change the design in any way. Therefore, the changes do not result in a reduction in standardization. Thus, the staff finds that 10 CFR Part 52.63(b)(1) is satisfied.

3.1.6 NO SIGNIFICANT REDUCTION IN SAFETY

This exemption would allow the implementation of changes to COL Appendix C and corresponding Tier 1 information proposed in the LAR. The changes to consolidate and relocate ITAAC in PS-DCD Tier 1 will not impact the functional capabilities of the components identified in the affected ITAAC. The proposed changes will not modify the design or operation of any systems or equipment, there are no new failure modes introduced by these changes and the level of safety provided by the current SSCs will be unchanged. Therefore, as required by 10 CFR Part 52, Appendix D, Section VIII.A.4, the staff finds that granting the exemption would not result in a significant decrease in the level of safety otherwise provided by the design.

3.2 EVALUATION OF PROPOSED CHANGES

SNC states that the purpose of the LAR is to consolidate a number of ITAAC to improve the efficiency of the ITAAC completion and closure process. Therefore, the information presented by SNC in this LAR was evaluated by the staff to confirm that the requested changes to the ITAAC Tables in Tier 1 do not substantively change what the existing ITAAC are intended to verify. For the ITAAC proposed for consolidation, the associated UFSAR design information is consistent with the current plant design, therefore, no SSC, design function, or analysis, as described in the UFSAR, is affected by the proposed changes.

In LAR 17-038, on page 23 of Enclosure 1, SNC indicates that the ITAAC Number and ITAAC Index Number will be retained for each ITAAC consolidated into other ITAAC. In addition, SNC indicates that a reference will be provided for each consolidated ITAAC to specify the amendment number when this LAR is approved and implemented. The staff reviewed SNC's statement and determined that the retention of the ITAAC Number and ITAAC Index Number, as well as a reference to the applicable amendment number for each consolidated ITAAC, will ensure that the tracking and close-out of those ITAAC that are referenced in previous SNC and NRC documentation will be accomplished.

In the LAR, SNC grouped the ITAAC in four categories. For each Category below, multiple ITAAC are proposed for consolidation to allow a single completion package and ITAAC Closure Notification for each consolidated ITAAC.

1. "Initial Test Program" (ITP) ITAAC, which demonstrate testing of components within a system along with associated system testing.
2. "Initial Test Program and Related Inspections" ITAAC, which verify the existence and location of components and equipment features prior to demonstrating testing of components within a system along with associated system testing.
3. "Related Inspection and Analyses" ITAAC, which verify similar attributes of related components within a system through inspections, tests outside of ITP scope, analyses, or some combination of the three.
4. "Security Testing" ITAAC, which demonstrate related aspects of the security system through inspections, tests outside of ITP scope, analyses, or some combination of the three.

As explained below, the staff reviewed the proposed changes and determined that they do not substantively change what the ITAAC are intended to verify. The proposed changes to the ITAAC Tables of Appendix C of the COL are considered administrative in nature for consolidation purposes. There are no changes to the design, functional capabilities, method for performing a function, design analysis, safety analysis, or UFSAR Tier 2 information involved; and thus, the requested Tier 1 changes do not affect any design functions. Also, the proposed changes do not involve a change to the method of evaluation for establishing design bases or safety analyses. Finally, tests, experiments, and procedures described in the licensing basis were not changed by the proposed departures.

3.2.1 CATEGORY 1 – ITP ITAAC

Several ITAAC verify that components within a given system demonstrate their safety or non-safety-related function by testing their listed function or capability during the component test phase. There are additional ITAAC that demonstrate the given integrated system performs in accordance with design criteria through pre-operational system testing. These ITAAC (hereafter referred to collectively as ITP ITAAC) require completed test results in order to close each individual testing ITAAC. Individual component ITAAC are performed prior to the associated system pre-operational testing ITAAC, and are therefore related ITAAC. In this category of ITAAC being consolidated, one or more tests are used to complete several related ITAAC within the same system.

The first two columns in the table below identify the ITP ITAAC that are to be consolidated into the ITAAC listed in the third column. SNC proposes to consolidate the ITAAC by moving the Design Commitment (DC), Inspections, Tests, Analyses (ITA), and Acceptance Criteria (AC) from the ITAAC listed in the first two columns to the consolidated ITAAC.

ITAAC Index Number	ITAAC Number	Consolidated ITAAC Number (Index Number)
45	2.1.02.10	2.1.02.11a.ii (47)
49	2.1.02.11b.ii	
50	2.1.02.11b.iii	
62	2.1.02.12b	
79	2.1.03.07.ii	2.1.03.07.i (78)
85	2.1.03.10	
111	2.2.01.10a	2.2.01.09 (110)
112	2.2.01.10b	
148	2.2.02.08b	2.2.02.07f.i (145)
208	2.2.03.11a.ii	2.2.03.10 (206)
210	2.2.03.11b.ii	
211	2.2.03.11b.iii	
217	2.2.03.12b	
218	2.2.03.13	
240	2.2.04.09a.i	2.2.04.12a.iii (250)
244	2.2.04.10	
245	2.2.04.11a	
246	2.2.04.11b.i	
247	2.2.04.11b.ii	

ITAAC Index Number	ITAAC Number	Consolidated ITAAC Number (Index Number)
251	2.2.04.12b	
267	2.2.05.07a.iii	2.2.05.07a.i (265)
268	2.2.05.07b.i	
269	2.2.05.07b.ii	
271	2.2.05.07d	
272	2.2.05.08	
273	2.2.05.09a	
274	2.2.05.09b	
275	2.2.05.10	
276	2.2.05.11	
277	2.2.05.12	
282	2.3.01.04	2.3.01.03.ii (281)
283	2.3.01.05	
304	2.3.02.08b	2.3.02.08a.i (301)
305	2.3.02.09	
306	2.3.02.10a	
307	2.3.02.10b.i	
308	2.3.02.10b.ii	
311	2.3.02.11a.iii	
312	2.3.02.11a.iv	
313	2.3.02.11b	
314	2.3.02.12a	
315	2.3.02.12b	
316	2.3.02.13	
325	2.3.03.05	2.3.03.04 (324)
347	2.3.05.03b.ii	2.3.05.03b.iii (348)
353	2.3.05.04	
381	2.3.06.10	2.3.06.11a (382)
383	2.3.06.11b	
388	2.3.06.12b	
389	2.3.06.13	
390	2.3.06.14	

ITAAC Index Number	ITAAC Number	Consolidated ITAAC Number (Index Number)
410	2.3.07.08.ii	2.3.07.07c (408)
411	2.3.07.09	
412	2.3.07.10	
413	2.3.07.11	
418	2.3.08.03	2.3.08.02.i (415)
419	2.3.08.04	
443	2.3.13.09	2.3.10.07a.ii (444)
445	2.3.13.10a	
446	2.3.13.10b	
447	2.3.13.11b	
448	2.3.13.12	
471	2.3.06.10	2.3.13.08 (470)
472	2.3.06.11b	
473	2.3.06.12b	
475	2.3.06.13	
476	2.3.06.14	
490	2.3.29.03	2.3.29.02 (489)
494	2.4.01.03	2.4.01.02 (493)
495	2.4.01.04	
499	2.4.02.02c	2.4.02.02a (497)
501	2.4.02.03.ii	
507	2.5.01.02b	2.5.01.02a (506)
508	2.5.01.02c.i	
509	2.5.01.02c.ii	
510	2.5.01.02d	
516	2.5.01.03f	
517	2.5.01.03g	
531	2.5.02.06b	2.5.02.06a.ii (530)
533	2.5.02.06c.ii	
539	2.5.02.08a.i	
541	2.5.02.08a.iii	
544	2.5.02.08c	
545	2.5.02.09a	
546	2.5.02.09b	

ITAAC Index Number	ITAAC Number	Consolidated ITAAC Number (Index Number)
547	2.5.02.09c	
558	2.5.04.02.ii	2.5.04.02.i (557)
559	2.5.04.02.iii	
584	2.6.01.04a	2.6.01.04e (588)
589	2.6.01.04f	
590	2.6.01.05	
591	2.6.01.06	
604	2.6.03.04d	2.6.03.04c (603)
605	2.6.03.04e	
606	2.6.03.04f	
607	2.6.03.04g	
608	2.6.03.04h	
610	2.6.03.05a	
611	2.6.03.05b	
612	2.6.03.05c	
615	2.6.03.06	
620	2.6.03.11	
623	2.6.04.02b	2.6.04.02a (622)
625	2.6.04.03	
626	2.6.04.04	
693	2.7.01.08d	2.7.01.14 (700)
694	2.7.01.09	
695	2.7.01.10a	
696	2.7.01.10b	
697	2.7.01.11	
698	2.7.01.12	
699	2.7.01.13	
705	2.7.02.04	2.7.02.03a (703)
706	2.7.02.05	
711	2.7.03.04	2.7.03.03 (710)
717	2.7.04.04	2.7.04.03 (716)
720	2.7.05.02.ii	2.7.05.02.i (719)
721	2.7.05.02.iii	

ITAAC Index Number	ITAAC Number	Consolidated ITAAC Number (Index Number)
722	2.7.05.03	

The staff reviewed the proposed changes to consolidate these ITAAC and confirmed that the consolidated ITAAC require completion of the same processes and have identical ITA and AC as the existing ITAAC. Therefore, the staff confirmed that the requested changes are administrative and do not change what the existing ITAAC are intended to verify.

3.2.2 CATEGORY 2 – ITP AND RELATED INSPECTIONS ITAAC

In addition to the ITP ITAAC, there are ITAAC that require inspections related to the components or system being tested. These ITAAC, combined with one or more of the groupings of ITP ITAAC, are hereafter referred to collectively as ITP and Related Inspections ITAAC. In this category of ITAAC, one or more tests and related inspections are used to complete several related ITAAC within the same system. Inspections of components, where the components have ITP ITAAC, are proposed to be combined with the ITP ITAAC because the inspections are related to the ITP ITAAC. The proposed changes include consolidation of inspections with one or more component testing ITAAC, pre-operational testing ITAAC, or a combination of one or more component testing ITAAC and pre-operational testing ITAAC.

The first two columns in the table below identify the ITP and Related Inspections ITAAC that are to be consolidated into the ITAAC listed in the third column. SNC proposes to consolidate the ITAAC by moving the DC, ITA, and AC from the ITAAC listed in the first two columns to the consolidated ITAAC.

ITAAC Index Number	ITAAC Number	Consolidated ITAAC Number (Index Number)
2	2.1.01.02	2.1.01.04 (4)
5	2.1.01.05	
6	2.1.01.06.i	
9	2.1.01.07.ii	
135	2.2.02.07a.i	2.2.02.07b.i (138)
136	2.2.02.07a.ii	
139	2.2.02.07b.ii	
140	2.2.02.07b.iii	
141	2.2.02.07c	
142	2.2.02.07d	
144	2.2.02.07e.ii	
150	2.2.02.09	
151	2.2.02.10a	
152	2.2.02.10b	

ITAAC Index Number	ITAAC Number	Consolidated ITAAC Number (Index Number)
156	2.2.02.11a.iii	
157	2.2.02.11b	
376	2.3.06.09b.iii	2.3.06.09b.ii (375)
377	2.3.06.09b.iv	
378	2.3.06.09b.v	
379	2.3.06.09c	
380	2.3.06.09d	
386	2.3.06.12a.iii	
387	2.3.06.12a.iv	
423	2.3.09.03.i	2.3.09.03.ii (424)
427	2.3.09.04a	
429	2.3.09.05	
484	2.3.19.01a	2.3.19.02a (486)
485	2.3.19.01b	
487	2.3.19.02b	
628	2.6.05.02.i	2.6.05.02.ii (629)
633	2.6.05.05.i	
634	2.6.05.05.ii	
635	2.6.05.06.i	
636	2.6.05.06.ii	
727	2.7.06.03.ii	2.7.06.03.i (726)
728	2.7.06.03.iii	
729	2.7.06.04	
730	2.7.06.05	
829	3.5.00.04	3.5.00.06 (831)
830	3.5.00.05	
832	3.5.00.07	
833	3.5.00.08	

The staff reviewed the proposed changes to consolidate these ITAAC and confirmed that the consolidated ITAAC require completion of the same processes and have identical ITA and AC as the existing ITAAC. Therefore, the staff confirmed that the requested changes are administrative and do not change what the existing ITAAC are intended to verify.

3.2.3 CATEGORY 3 – RELATED INSPECTIONS AND ANALYSES ITAAC

Similar to ITP and Related Inspections ITAAC, there are ITAAC (hereafter referred to collectively as Related Inspections and Analyses ITAAC) that require inspections, tests outside of ITP scope, or analyses on related components or systems. In this category of ITAAC being consolidated, one or more related inspections or analyses are used to complete several related ITAAC within the same system. Inspections of physical attributes of the system, including components within the system, can be combined with other related inspections in the same system. The proposed changes include consolidation of inspections, tests outside of ITP scope, and analyses.

The first two columns in the table below identify the Related Inspections and Analyses ITAAC that are to be consolidated into the ITAAC listed in the third column. SNC proposes to consolidate the ITAAC by moving the DC, ITA, and AC from the ITAAC listed in the first two columns to the consolidated ITAAC.

ITAAC Index Number	ITAAC Number	Consolidated ITAAC Number (Index Number)
37	2.1.02.08d.vi	2.1.02.08d.v (36)
39	2.1.02.08d.viii	
70	2.1.03.02b	2.1.03.02a (69)
146	2.2.02.07f.ii	2.2.02.07a.iii (137)
147	2.2.02.08a	
188	2.2.03.08c.v.02	2.2.03.08c.iv.01 (183)
333	2.3.04.06	2.3.04.04.i (330)
334	2.3.04.07	
345	2.3.05.03a.iii	2.3.05.03a.ii (344)
562	C.2.5.04.04b	C.2.5.04.04a (561)
563	C.2.5.04.04c	
614	2.6.03.05d.ii	2.6.03.05d.i (613)
617	2.6.03.08	2.6.03.07 (616)
618	2.6.03.09	
619	2.6.03.10	

ITAAC Index Number	ITAAC Number	Consolidated ITAAC Number (Index Number)
638	2.6.06.01.ii	2.6.06.01.i (637)
639	2.6.06.01.iii	
640	2.6.06.01.iv	
817	3.3.00.10.iii	3.3.00.10.ii (816)

The staff reviewed the proposed changes to consolidate these ITAAC and confirmed that the consolidated ITAAC require completion of the same processes and have identical ITA and AC as the existing ITAAC. Therefore, the staff confirmed that the requested changes are administrative and do not change what the existing ITAAC are intended to verify.

3.2.4 CATEGORY 4 – SECURITY TESTING ITAAC

Similar to Related Inspections and Analyses ITAAC, there are ITAAC (hereafter referred to collectively as Security Testing ITAAC) that require inspections, tests outside of ITP scope, or analyses in the security system. In this category of ITAAC being consolidated, one or more related ITA, or some combination of the three, are used to complete several related ITAAC within the security system. Inspections of physical attributes of the security system, including components and features within the system, can be combined with other related inspections in the security system. The proposed changes include consolidation of inspections, tests outside of ITP scope, and analyses, or some combination of the three.

The first two columns in the table below identify the Security Testing ITAAC that are to be consolidated into the ITAAC listed in the third column. SNC proposes to consolidate the ITAAC by moving the DC, ITA, and AC from the ITAAC listed in the first two columns to the consolidated ITAAC.

ITAAC Index Number	ITAAC Number	Consolidated ITAAC Number (Index Number)
656	2.6.09.15b	2.6.09.05a (644)
648	2.6.09.07a	C.2.6.09.07 (667)
649	2.6.09.07b	
651	2.6.09.09	C.2.6.09.09 (670)
653	2.6.09.13b	2.6.09.13a (652)
657	2.6.09.16	2.6.09.15a (655)

ITAAC Index Number	ITAAC Number	Consolidated ITAAC Number (Index Number)
662	C.2.6.09.04a	C.2.6.09.03b (661)
663	C.2.6.09.04b	
665	C.2.6.09.05b	C.2.6.09.05a (664)
669	C.2.6.09.08b	C.2.6.09.08a (668)

The staff reviewed the proposed changes to consolidate these ITAAC and confirmed that the consolidated ITAAC require completion of the same processes and have identical ITA and AC as the existing ITAAC. Therefore, the staff confirmed that the requested changes are administrative and do not change what the existing ITAAC are intended to verify.

3.3 SUMMARY

In LAR 17-038, SNC proposed to make changes that would affect the COL Appendix C and corresponding PS-DCD Tier 1 information. None of the above proposed changes represent any technical changes to the design, construction, or operation of the plant. No SSC, design function, or analysis, as described in the UFSAR, is affected. The staff finds that all of the proposed changes are administrative and do not alter what the ITAAC are intended to verify. Additionally, the staff finds that the retention of the ITAAC Number and ITAAC Index Number, as well as a reference to the applicable amendment number for each consolidated ITAAC, will ensure that the tracking and close-out of those ITAAC that are referenced in previous SNC and NRC documentation will be accomplished. Therefore, within the scope of this license amendment, the NRC finds that 10 CFR 52.97(b) is satisfied. The NRC documented its review of the above changes in Section 3.2 of this safety evaluation and finds the changes acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations in 10 CFR 50.91(b)(2), on February 7, 2018, the Georgia State official was consulted. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20, "Standards for Protection Against Radiation." The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite. Also, there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (*Federal Register*, 83 FR 170, dated January 2, 2018). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR

51.22(c)(9). Under 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment.

Because the exemption is necessary to allow the changes proposed in this LAR, and because the exemption does not authorize any activities other than those proposed in this LAR, the environmental consideration for the exemption is identical to that of the license amendment. Accordingly, the exemption meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the exemption.

6.0 CONCLUSION

The staff has determined that pursuant to Section VIII.A.4 of Appendix D to 10 CFR Part 52, the exemption (1) is authorized by law, (2) presents no undue risk to the public health and safety, (3) is consistent with the common defense and security, (4) presents special circumstances, (5) justifies that the special circumstances outweigh any potential decrease in safety due to reduced standardization, and (6) does not result in a significant decrease in the level of safety otherwise provided by the design. Therefore, the staff grants the exemption from the Tier 1 information requested by SNC and evaluated in Section 3.2 of this safety evaluation.

The staff has concluded, based on the considerations discussed in Section 3.2 and confirming that these changes do not change an analysis methodology, assumptions, or the design itself, that there is reasonable assurance that: (1) the health and safety of the public will not be endangered by construction and 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 amendment will not be inimical to the common defense and security or to the health and safety of the public. Therefore, the staff finds the changes proposed in this LAR acceptable.

7.0 REFERENCES

1. Southern Nuclear Operating Company, Vogtle Electric Generating Plant Units 3 and 4, "Request for License Amendment and Exemption: Testing Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Consolidation (LAR 17-038)," November 16, 2017 (ADAMS Accession No. ML17325A562).
2. Vogtle Units 3 and 4 Updated Final Safety Analysis Report, Revision 6 and Tier 1, Revision 5 dated June 15, 2017 (ADAMS Accession No. ML17172A218).
3. AP1000 Design Control Document, Revision 19, June 13, 2011 (ADAMS Accession No. ML11171A500).
4. Combined License NPF-91 for Vogtle Electric Generating Plant Unit 3, Southern Nuclear Operating Company (ADAMS Accession No. ML14100A106).

5. Combined License NPF-92 for Vogtle Electric Generating Plant Unit 4, Southern Nuclear Operating Company (ADAMS Accession No. ML14100A135).