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Docket Nos.: 52-025  
52-026

ND-18-0058  
10 CFR 50.90

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  
Supplement to Request for License Amendment:  
Technical Specification Updates for Reactivity Controls  
and other Miscellaneous Changes (LAR-17-024S1)

Ladies and Gentlemen:

Pursuant to 10 CFR 52.98(c) and in accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC) previously requested an amendment to the combined licenses (COLs) for Vogtle Electric Generating Plant (VEGP) Units 3 and 4 (License Numbers NPF-91 and NPF-92, respectively). The requested amendment proposes to depart from approved COL Appendix A, Technical Specifications.

SNC originally submitted this request by SNC letter ND-17-1279, dated July 28, 2017 [ADAMS Accession No. ML17209A755].

SNC has determined that an additional editorial change to the proposed TS Surveillance Requirement (SR) 3.1.4.2 Note is necessary to conform to the Writer's Guide for Plant-Specific Improved Technical Specifications, TSTF-GG-05-01. This supplement updates LAR-17-024 to reflect the necessary changes as shown in Enclosures 4 and 5.

Enclosure 4 provides the applicable detailed description and technical evaluation for the proposed change. Enclosure 5 provides the applicable revised markups depicting the requested change to the licensing basis documents requiring NRC staff approval.

This revision to the original LAR reflects an editorial improvement and does not expand the scope of the request, or alter the conclusions of the Significant Hazards Consideration Determination or Environmental Considerations submitted in LAR-17-024.

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

SNC requests NRC staff review and approval of the license amendment by March 30, 2018, to support Operator training updates. Delayed approval of this license amendment could result in a

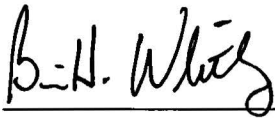
delay in Operator training updates. SNC expects to implement the proposed amendment within thirty days of approval.

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 its enclosures to the designated State Official.

Should you have any questions, please contact Mr. Wesley A. Sparkman at (205) 992-5061.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 23<sup>rd</sup> day of January 2018.

Respectfully submitted,



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

- Enclosures
- 1) - 3) (previously submitted with the original LAR, LAR-17-024, in SNC letter ND-17-1279) (LAR-17-024)
  - 4) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 - Supplement to Request for License Amendment: Technical Specification Updates for Reactivity Controls and other Miscellaneous Changes (LAR-17-024S1)
  - 5) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Supplement to Proposed Changes to Licensing Basis Documents (LAR-17-024S1)

cc:

Southern Nuclear Operating Company / Georgia Power Company

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**Southern Nuclear Operating Company**

**ND-18-0058**

**Enclosure 4**

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

**Supplement to Request for License Amendment:  
Technical Specification Updates for Reactivity Controls  
and other Miscellaneous Changes (LAR-17-024S1)**

(This Enclosure consists of 2 pages, including this cover page.)

ND-18-0058

Enclosure 4

Supplement to Request for License Amendment: Technical Specification Updates for Reactivity Controls and other Miscellaneous Changes (LAR-17-024S1)

Vogtle Electric Generating Plant (VEGP) Units 3 and 4, submitted License Amendment Request LAR-17-024 via Southern Nuclear Operating Company (SNC) letter ND-17-1279 on July 28, 2017. The portion of the LAR identified as change "L02J" on Page 5 of 39 and Page 25 of 39 of Enclosure 1 in part proposed a change to Technical Specification (TS) Surveillance Requirement (SR) 3.1.4.2. This portion of the "L02J" change stated:

Change SR 3.1.4.2 Note from "Not applicable to GRCAs" to "Not applicable to Axial Offset (AO) Control Bank RCCAs."

The "Not applicable to ..." phrasing used in the SR 3.1.4.2 Note is proposed to be revised to "Not required to be performed for ..." such that the proposed Note is "Not required to be performed for Axial Offset (AO) Control Bank RCCAs." Refer to Enclosure 5 for the revised markup of SR 3.1.4.2.

This change is necessary to clarify the intent as outlined in the Writer's Guide for Plant-Specific Improved Technical Specifications, TSTF-GG-05-01, subsection 4.1.7 paragraphs f and g. The phrasing "Not applicable to ..." is vague with respect to whether the intent is an exception to the SR being "met" or being "performed." This intent is clearly presented in the TS Bases provided for information only in ND-17-1279, Enclosure 3, which in part stated:

This SR is modified by a Note stating that the Surveillance is not required to be performed for AO control bank RCCAs. While AO control bank RCCAs are included in the class of control rods required to be OPERABLE, the surveillance is not required to be performed ...

As such, the proposed change to the phrasing of the SR 3.1.4.2 Note provides a clarification of the intent consistent with the proposed TS Bases and with the guidance of the Writer's Guide.

This revision to the original LAR reflects an editorial improvement and does not expand the scope of the request, or alter the conclusions of the Significant Hazards Consideration Determination or Environmental Considerations submitted in LAR 17-024.

**Southern Nuclear Operating Company**

**ND-18-0058**

**Enclosure 5**

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

**Supplement to Proposed Changes to Licensing Basis Documents**

**(LAR-17-024S1)**

**Insertions Denoted by Blue Underline and Deletions by ~~Red~~ Strikethrough**  
**Omitted text is identified by three asterisks (\* \* \*)**

(This Enclosure consists of 2 pages, including this cover page)

Replace the markup shown as L02J-M on Page 5 of 9 of Enclosure 2 as shown below.

**Revised COL Appendix A (Technical Specifications), TS 3.1.4, Rod Group Alignment Limits, as follows (L02J-M):**

**SURVEILLANCE REQUIREMENTS**

<b>SURVEILLANCE</b>		<b>FREQUENCY</b>
<b>* * *</b>	<b>* * *</b>	<b>* * *</b>
<b>SR 3.1.4.2</b>	<p>-----</p> <p>- NOTE -</p> <p>Not <del>applicable to</del> <u>required to be performed for GRCA's Axial Offset (AO) Control Bank RCCAs.</u></p> <p>-----</p> <p>Verify rod freedom of movement (trippability) by moving each <del>rod</del> <u>RCCA</u> not fully inserted in the core <math>\geq 10</math> steps in either direction.</p>	<b>* * *</b>
<b>SR 3.1.4.3</b>	<p>-----</p> <p><del>-NOTE-</del></p> <p><del>Not applicable to GRCA's.</del></p> <p>-----</p> <p>Verify rod drop time of each <del>rod</del> <u>RCCA</u>, from the fully withdrawn position, is <math>\leq 2.7</math> seconds from the beginning of decay of stationary gripper coil voltage to dashpot entry, with:</p> <p>* * *</p>	<b>* * *</b>