

## Vogtle PEmails

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**From:** Habib, Donald  
**Sent:** Tuesday, June 5, 2018 11:03 AM  
**To:** Haggerty, Neil; Redd, Jason P.  
**Cc:** Vogtle PEmails  
**Subject:** DRAFT - Vogtle LAR-17-037 Audit Plan.docx  
**Attachments:** Vogtle LAR-17-037 Audit Plan.docx

Jason and Neil –

Attached is the audit plan for the upcoming site visit.

Please let me know if this plan can be finalized, or if changes are appropriate.

Thanks

Don Habib  
Project Manager  
NRO/DNRL, Licensing Branch 4  
O-8D13  
301-415-1035

**Hearing Identifier:** Vogtle\_COL\_Docs\_Public  
**Email Number:** 292

**Mail Envelope Properties** (BY1PR09MB093597D403CDD32AF4B9913C97660)

**Subject:** DRAFT - Vogtle LAR-17-037 Audit Plan.docx  
**Sent Date:** 6/5/2018 11:02:50 AM  
**Received Date:** 6/5/2018 11:02:55 AM  
**From:** Habib, Donald  
  
**Created By:** Donald.Habib@nrc.gov

**Recipients:**

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**Post Office:** BY1PR09MB0935.namprd09.prod.outlook.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	298	6/5/2018 11:02:55 AM
Vogtle LAR-17-037 Audit Plan.docx		59551

**Options**

**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**



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

May XX, 2018

MEMORANDUM TO: Jennifer Dixon-Herrity, Chief  
Licensing Branch 4  
Division of New Reactor Licensing  
Office of New Reactors

FROM: Don Habib Project Manager  
Licensing Branch 4  
Division of New Reactor Licensing  
Office of New Reactors

SUBJECT: AUDIT PLAN FOR VOGTLE ELECTRIC GENERATING PLANT  
UNITS 3 AND 4, REQUEST FOR LICENSE AMENDMENT AND  
EXEMPTION: CHANGES TO TIER 2\* DEPARTURE  
EVALUATION PROCESS (LAR 17-037)

By letter dated December 21, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML17355A416), Southern Nuclear Operating Company (the licensee) requested an amendment to Combined License Numbers NPF-91 and NPF-92, for Vogtle Electric Generating Plant (Vogtle) Units 3 and 4.

The requested amendment and exemption requires changes to the combined licenses in the form of a new license condition and an exemption from 10 CFR Part 52 regulations that require NRC approval in order for the Vogtle licensee to depart from Tier 2\* information in the Vogtle updated final safety analysis report (UFSAR).

The requested amendment proposes new criteria that, if met, would allow the licensee to revise Tier 2\* information in the UFSAR without NRC approval.

The Structural Engineering Branch staff plans to conduct an audit to gain better understanding of certain construction details that, if changed, would result in changes to Tier 2\* information in the UFSAR and how these changes would be handled under the licensee's proposed license condition.

Docket Nos.: 52-025 and 52-026

Enclosure:  
Regulatory Audit Plan

cc: See next page

CONTACT: Donald Habib, NRO/DNRL/LB4  
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U.S. NUCLEAR REGULATORY COMMISSION AUDIT PLAN FOR VOGTLE ELECTRIC  
GENERATING PLANT UNITS 3 AND 4, REQUEST FOR LICENSE AMENDMENT AND  
EXEMPTION: CHANGES TO TIER 2\* DEPARTURE EVALUATION PROCESS (LAR 17-037)  
DATED: June XX, 2018

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JDixon-Herrity

**ADAMS Accession No.: MLXX****NRO-008**

OFFICE	DNRL/LB4/PM	DNRL/LB4/LA	DNRL/LB4/BC
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DATE	6/18	6/18	6/18

**OFFICIAL RECORD COPY**

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(Revised 01/09/2018)

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## **AUDIT OF DRAWINGS AND CONSTRUCTION STRUCTURES IN SUPPORT OF REQUEST FOR LICENSE AMENDMENT RELATED TO CHANGES TO TIER 2\* DEPARTURE EVALUATION PROCESS (LAR 17-037)**

### **SOUTHERN NUCLEAR OPERATING COMPANY VOGTLE ELECTRIC GENERATING PLANT, UNITS 3 AND 4 Docket Nos. 52-025 and 52-026**

Location: Vogtle Units 3 and 4 Plant Site, Vogtle Support Center  
7821 River Road  
Waynesboro, GA 30830

The purpose of the audit is to review the structural construction and supporting documents needed by staff to verify the information and conclusions in the "Request for License Amendment and Exemption: Changes to Tier 2\* Departure Process (LAR 17-037) submitted by Southern Nuclear Operating Company (SNC) for the Vogtle Electric Generating Plant (Vogtle), Units 3 and 4, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17355A416).

#### **A. Background:**

In LAR-17-037, SNC proposes an exemption from 10 CFR Part 52 regulations that require NRC approval in order to depart from changes to Tier 2\* information in the Vogtle Updated Final Safety Analysis Report (UFSAR) and proposes certain criteria that, if met, would allow the Vogtle licensee to depart from Tier 2\* information without securing NRC approval.

In a draft response to a request for additional information, SNC proposed to revise one of its previously proposed criteria to account for possible future departures from Tier 2\* information in Chapter 3 of the UFSAR related to critical structures (ADAMS Accession Nos. ML18102B682 and ML18145A289).

The NRO Projects staff determined that an audit of the critical section structural construction information is an appropriate method to confirm how the proposed criteria adequately address possible changes to Tier 2\* information regarding critical sections in Chapter 3 of the UFSAR.

#### **B. Regulatory Audit Basis**

10 CFR Part 52, Appendix D, Section VIII.B.6.b and c describe how a licensee who references this appendix may not depart from Tier 2\* information without prior NRC approval.

The NRC staff will follow NRO Office Instruction NRO-REG-108 (Revision 0), "Regulatory Audits," (ADAMS Accession No. ML081910260) in performing the audit of the reports and calculations cited below.

#### **C. Regulatory Audit Scope**

In LAR-17-037, SNC proposed several criteria, any one of which, if met by a proposed change, would require NRC approval in order to be implemented. In a draft response to staff RAI 17-037-2,

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SNC proposed the following criterion to address changes in the demand-to-capacity ratios for structural reinforcement in critical sections:

1. Involve design methodology or structural construction materials that involve deviations from the demand-to-capacity ratios specified in UFSAR Section 3.8 and Appendix 3H Tier 2\* tables that do not meet all of the following criteria:
  - a. The impact of the variance is localized over a height or length that is no wider than the thickness of the section for reinforced concrete and structural module walls and floors, or the depth of a structural steel section.
  - b. The local provided reinforcement is greater than the local required reinforcement.
  - c. The localized variance does not adversely impact the ability of the structural member to perform its intended service function or the service function of other structures, systems, or components.

## **D. Information and Other Material Necessary for the Regulatory Audit**

The audit will consist of a physical walkdown of example several structures and a review of related detailed design and construction documents.

Other documents may be requested based on the staff's review of the above documents.

Appropriate handling and protection of proprietary information shall be acknowledged and observed throughout the audit.

## **E. Audit Team**

The following are the NRC audit team members:

Don Habib, Project Manager (NRC), Lead  
Sujit Samaddar, Structural Engineering Branch Chief  
Pravin Patel, Structural Engineering Technical Reviewer  
Vaughn Thomas, Structural Engineering Technical Reviewer

The following are the licensee contacts:

Jason Redd (SNC)  
Neil Haggerty (SNC)

## **F. Logistics**

The audit is planned to occur at the Vogtle Units 3 and 4 construction site on June 7, 2018, beginning at the Vogtle Support Center 7821 River Road Waynesboro, GA 30830, and to finish on June 8, with a public meeting beginning at 10:00 am at the Vogtle Support Center. The following schedule is planned:

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- Arrive at Vogtle Support Center by 7:45 am. Activities include badging, safety briefing, PPE, etc.
- Document review & work front tour (Start - 8:30 am)
- Lunch
- Staff's review of revised draft response to RAI LAR-17-037-2, as assisted by work front tour and detailed documentation review – Thursday afternoon
- Public call – Discuss results of Staff's review of draft RAI response, as assisted by previous day's tour and reviews (Friday – 10:00 am).

### **G. Special Requests**

If necessary, any circumstances arising during performance of the audit will be communicated between Don Habib (NRC) and an available SNC point of contact.

### **H. Deliverables**

At the completion of the audit, the NRC staff will prepare an audit report that will be declared and entered as an official agency record in ADAMS in accordance with NRO Office Instruction NRO-REG-108.