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Docket Nos.: 52-025
52-026

ND-18-0656
10 CFR 50.71(e)
10 CFR 52 App. D, Section X.B.2

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

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4
Updated Final Safety Analysis Report, Tier 1, Technical Requirements Manual and
Technical Specifications Bases Annual Submittal

Ladies and Gentlemen:

This submittal is made with regard to the Vogtle Electric Generating Plant, Units 3 and 4 (VEGP 3&4), combined license (COL) numbers NPF-91 and NPF-92, respectively, pursuant to the reporting requirements of 10 CFR 50.71(e) and 10 CFR Part 52, Appendix D, Section X.B.2.

SNC hereby submits the following documents:

- VEGP 3&4 Updated Final Safety Analysis Report (UFSAR), Revision 7
- VEGP 3&4 Tier 1, Revision 6
- VEGP Units 3 and 4 Technical Requirements Manual (TRM), Revision 7
- VEGP Units 3 and 4 Technical Specifications (TS) Bases, Revision 23

The VEGP 3&4 UFSAR and VEGP 3&4 Tier 1 include plant-specific departures and changes through March 6, 2018. The VEGP Units 3 and 4 TRM, and VEGP Units 3 and 4 TS Bases include plant-specific departures and changes through April 24, 2018 and April 27, 2018, respectively.

The VEGP 3&4 UFSAR includes plant-specific Design Control Document (PS DCD) Tier 2 and Tier 2* information and site-specific and standard content. The VEGP 3&4 UFSAR includes colored text as a user's aid in identifying the origin of the text. A formatting legend is provided at the bottom of the Table of Contents page for each chapter. The VEGP 3&4 Tier 1 is also part of the PS DCD. In addition, the VEGP Units 3 and 4 TRM contains Tier 2 information previously included in the VEGP 3&4 UFSAR, Section 16.3, Investment Protection, and is therefore, considered part of the VEGP 3&4 PS DCD. The VEGP Units 3 and 4 TRM is incorporated by reference into the VEGP 3&4 UFSAR.

The VEGP Units 3 and 4 TS Bases is also provided with this submittal, in accordance with VEGP Units 3 and 4 TS 5.5.6, TS Bases Control Program.

The Nuclear Development Quality Assurance Manual (NDQAM) Version 18.0, which is incorporated by reference in the UFSAR, was previously provided to the NRC on

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March 20, 2018 by SNC Letter ND-18-0295 (ADAMS Accession Number ML18079A532), in accordance with 10 CFR 50.71(e) and 10 CFR 50.55(f)(4).

Enclosure 1 is a DVD that contains the complete VEGP 3&4 UFSAR and VEGP 3&4 Tier 1 in portable document format (PDF). Appropriate pre-submission checks have been performed on the files to ensure compliance with the NRC Guidance for Electronic Submissions.

Within Enclosure 1, the VEGP 3&4 UFSAR and VEGP 3&4 Tier 1 contain **Sensitive Unclassified Non-Safeguards Information (SUNSI), Security-Related Information, and Proprietary Information; therefore, SNC requests that these documents be withheld from public disclosure under 10 CFR 2.390(d).**

Enclosure 2 contains the list of VEGP 3&4 UFSAR and VEGP 3&4 Tier 1 figures and sections that contain Security-Related Information or Proprietary Information.

Enclosure 3 is a DVD that contains the public version of the VEGP 3&4 UFSAR and VEGP 3&4 Tier 1. The public version of the VEGP 3&4 UFSAR and VEGP 3&4 Tier 1 is redacted and withholds the Security-Related Information and Proprietary Information provided in Enclosure 1 as identified by Enclosure 2.

Enclosure 3 also contains the VEGP Units 3 and 4 TRM and the VEGP Units 3 and 4 TS Bases which do not contain Security-Related Information or Proprietary Information.

Proprietary information in UFSAR Appendix 7A was previously submitted by SNC, to the NRC, as licensing document markups in License Amendment Requests (LARs) that have since been reviewed and approved for incorporation into the VEGP 3&4 licensing basis.

Specifically, the following proprietary information was provided as shown below:

- LAR-15-005, which was submitted by SNC letter ND-15-0752 on October 15, 2015 [ADAMS Accession No. ML15288A549] was approved by the NRC as VEGP 3&4 COL Amendment No. 50 on July 12, 2016 [ML16103A382].
- LAR-16-021, which was submitted by SNC letter ND-16-1572 on August 31, 2016 [ML16244A836] was approved by the NRC as VEGP 3&4 COL Amendment Nos. 70 and 69, respectively, on February 9, 2017 [ML16343B021].
- LAR-16-018, which was submitted by SNC letter ND-16-1359 on October 14, 2016 [ML16288A810] was approved by the NRC as VEGP 3&4 COL Amendment Nos. 91 and 90, respectively, on October 19, 2017 [ML17268A075].
- LAR-17-001, which was submitted by SNC letter ND-17-0003 on May 9, 2017 [ML17129A608] and SNC letter ND-17-1519 on September 15, 2017 [ML17258B211], was approved by the NRC as VEGP 3&4 COL Amendment Nos. 108 and 107, respectively, on February 1, 2018 [ML18011A885].

For the reasons stated in the SNC letters discussed above, SNC requests that the material contained in the VEGP 3&4 UFSAR Appendix 7A continue to be withheld from public disclosure pursuant to 10 CFR 2.390.

The VEGP 3&4 UFSAR Appendix 7A includes the changes as presented in the licensing document markups in LAR-15-005, LAR-16-021, LAR-16-018, and LAR-17-001 and the basis for exemption from mandatory public disclosure is the same as previously stated in those SNC letters. The affidavits provided in support of the previous requests under 10 CFR 2.390 apply to the information in Appendix 7A and remain valid.

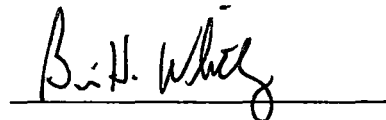
Enclosure 4 provides the SNC affidavit for withholding the additional proprietary information contained in UFSAR Appendix 7A, Section 7A.3 of Enclosure 1. Additional proprietary information is included the VEGP 3&4 UFSAR, Revision 7, Appendix 7A, Section 7A.3 that did not require prior NRC approval.

Enclosure 5 provides the Westinghouse affidavit for withholding proprietary information contained in Appendix 7A, Section 7A.3 of Enclosure 1. Enclosure 5 also provides Westinghouse's Proprietary Information Notice, Copyright Notice and CAW-17-4589, Application for Withholding Proprietary Information from Public Disclosure and Affidavit. The affidavit sets forth the basis upon which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of Section 2.390 of the Commission's regulations. Accordingly, it is respectfully requested that the information that is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations. Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse affidavit should reference CAW-17-4589 and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 3 Suite 310, Cranberry Township, Pennsylvania 16066. Correspondence with respect to proprietary aspects of this letter and its enclosures should also be addressed to Brian Whitley at the contact information within this letter.

This letter contains no NRC commitments. If you have any questions regarding this letter, please contact Ms. Amy Chamberlain at (205) 992-6361.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 15th of June 2018.

Respectfully submitted,

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

Brian H. Whitley
Regulatory Affairs Director
Southern Nuclear Operating Company

BHW/GAB/ljs

Enclosures:

1. DVD containing:
VEGP 3&4 UFSAR, Revision 7
VEGP 3&4 Tier 1, Revision 6
[Note: VEGP 3&4 UFSAR and VEGP 3&4 Tier 1 Contain SUNSI Security-Related Information and Proprietary Information – Withhold from Public Disclosure Under 10 CFR 2.390(d)]
2. List of VEGP 3&4 UFSAR and VEGP 3&4 Tier 1 Figures and Sections Containing Security-Related Information or Proprietary Information
3. DVD containing:
VEGP 3&4 UFSAR, Revision 7 (Public Version)
VEGP 3&4 Tier 1, Revision 6 (Public Version)
VEGP Units 3 and 4 TRM, Revision 7
VEGP Units 3 and 4 TS Bases, Revision 23
4. Vogtle Electric Generating Plant (VEGP) Units 3 and 4, Affidavit from Southern Nuclear Operating Company for Withholding Under 10 CFR 2.390 (Updated Final Safety Analysis Report, Tier 1, Technical Requirements Manual and Technical Specifications Bases Annual Submittal)
5. Vogtle Electric Generating Plant (VEGP) Units 3 and 4, Westinghouse Authorization Letter CAW-17-4589, Affidavit, Proprietary Information Notice and Copyright Notice (Updated Final Safety Analysis Report, Tier 1, Technical Requirements Manual and Technical Specifications Bases Annual Submittal)

cc: (All without enclosures, except as noted)

Southern Nuclear Operating Company / Georgia Power Company

Mr. S. E. Kuczynski
Mr. D. G. Bost
Mr. M. D. Meier
Mr. D. H. Jones
Mr. J. B. Klecha
Mr. G. Chick
Mr. D. L. McKinney
Mr. T. W. Yelverton
Mr. B. H. Whitley
Ms. C. A. Gayheart
Mr. C. R. Pierce
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Mr. D. L. Fulton
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Document Services RTYPE: VND.LI.L00 (with enclosures, without DVDs)
File AR.01.02.06

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Mr. M. L. Clyde
Ms. L. Iller
Mr. D. Hawkins
Mr. J. Coward

Other

Mr. S. W. Kline, Bechtel Power Corporation
Ms. L. A. Matis, Tetra Tech NUS, Inc.
Dr. W. R. Jacobs, Jr., Ph.D., GDS Associates, Inc.
Mr. S. Roetger, Georgia Public Service Commission
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Mr. S. Franzone, Florida Power & Light

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ND-18-0656

Enclosure 1

DVD containing:

**VEGP 3&4 UFSAR, Revision 7
VEGP 3&4 Tier 1, Revision 6**

**[Note: VEGP 3&4 UFSAR and VEGP 3&4 Tier 1 Contain SUNSI Security-Related Information
and Proprietary Information - Withhold Under 10 CFR 2.390(d)]**

List of Files Contained in DVD

VEGP3&4_UFSAR_CHAP01
VEGP3&4_UFSAR_CHAP02_SEC02.00-02.04
VEGP3&4_UFSAR_CHAP02_SEC02.04A
VEGP3&4_UFSAR_CHAP02_SEC02.04B
VEGP3&4_UFSAR_CHAP02_SEC02.05
VEGP3&4_UFSAR_CHAP02_SEC02.05A-02.05E
VEGP3&4_UFSAR_CHAP03_SEC03.01-03.07
VEGP3&4_UFSAR_CHAP03_SEC03.08
VEGP3&4_UFSAR_CHAP03_SEC03.09-03F
VEGP3&4_UFSAR_CHAP03_SEC03G-03GG
VEGP3&4_UFSAR_CHAP03_SEC03H-03I
VEGP3&4_UFSAR_CHAP04
VEGP3&4_UFSAR_CHAP05
VEGP3&4_UFSAR_CHAP06
VEGP3&4_UFSAR_CHAP07
VEGP3&4_UFSAR_CHAP08
VEGP3&4_UFSAR_CHAP09
VEGP3&4_UFSAR_CHAP10
VEGP3&4_UFSAR_CHAP11
VEGP3&4_UFSAR_CHAP12
VEGP3&4_UFSAR_CHAP13
VEGP3&4_UFSAR_CHAP14
VEGP3&4_UFSAR_CHAP15
VEGP3&4_UFSAR_CHAP16
VEGP3&4_UFSAR_CHAP17
VEGP3&4_UFSAR_CHAP18
VEGP3&4_UFSAR_CHAP19

VEGP3&4_TIER1

Total Files Listed: 28 File(s)

Southern Nuclear Operating Company

ND-18-0656

Enclosure 2

**List of VEGP 3&4 UFSAR and VEGP 3&4 Tier 1 Figures and Sections
Containing Security-Related Information or Proprietary Information**

(Enclosure 2 consists of 5 pages, including this cover page)

ND-18-0656

Enclosure 2

List of VEGP 3&4 UFSAR and VEGP 3&4 Tier 1 Figures and Sections
Containing Security-Related Information or Proprietary Information

Document	Basis for Withholding
UFSAR Figure 1.2-2	Security-Related Information
UFSAR Figure 1.2-4	Security-Related Information
UFSAR Figure 1.2-5	Security-Related Information
UFSAR Figure 1.2-6	Security-Related Information
UFSAR Figure 1.2-7	Security-Related Information
UFSAR Figure 1.2-8	Security-Related Information
UFSAR Figure 1.2-9	Security-Related Information
UFSAR Figure 1.2-10	Security-Related Information
UFSAR Figure 1.2-11	Security-Related Information
UFSAR Figure 1.2-12	Security-Related Information
UFSAR Figure 1.2-13	Security-Related Information
UFSAR Figure 1.2-14	Security-Related Information
UFSAR Figure 1.2-15	Security-Related Information
UFSAR Figure 1.2-16	Security-Related Information
UFSAR Figure 1.2-17	Security-Related Information
UFSAR Figure 1.2-201	Security-Related Information
UFSAR Figure 1.2-19	Security-Related Information
UFSAR Figure 1.2-20	Security-Related Information
UFSAR Figure 1.2-21	Security-Related Information
UFSAR Figure 1.2-22	Security-Related Information
UFSAR Figure 1.2-23	Security-Related Information
UFSAR Figure 1.2-24	Security-Related Information
UFSAR Figure 1.2-25	Security-Related Information
UFSAR Figure 1.2-26	Security-Related Information
UFSAR Figure 1.2-27	Security-Related Information
UFSAR Figure 1.2-28	Security-Related Information
UFSAR Figure 1.2-29	Security-Related Information
UFSAR Figure 1.2-30	Security-Related Information
UFSAR Figure 3.7.2-12 (Sheet 1 of 12)	Security-Related Information
UFSAR Figure 3.7.2-12 (Sheet 2 of 12)	Security-Related Information
UFSAR Figure 3.7.2-12 (Sheet 3 of 12)	Security-Related Information
UFSAR Figure 3.7.2-12 (Sheet 4 of 12)	Security-Related Information
UFSAR Figure 3.7.2-12 (Sheet 5 of 12)	Security-Related Information
UFSAR Figure 3.7.2-12 (Sheet 6 of 12)	Security-Related Information
UFSAR Figure 3.7.2-12 (Sheet 7 of 12)	Security-Related Information
UFSAR Figure 3.7.2-12 (Sheet 8 of 12)	Security-Related Information
UFSAR Figure 3.7.2-12 (Sheet 9 of 12)	Security-Related Information
UFSAR Figure 3.7.2-12 (Sheet 10 of 12)	Security-Related Information
UFSAR Figure 3.7.2-12 (Sheet 11 of 12)	Security-Related Information
UFSAR Figure 3.7.2-12 (Sheet 12 of 12)	Security-Related Information
UFSAR Figure 3.7.2-19 (Sheet 1 of 10)	Security-Related Information
UFSAR Figure 3.7.2-19 (Sheet 2 of 10)	Security-Related Information
UFSAR Figure 3.7.2-19 (Sheet 3 of 10)	Security-Related Information
UFSAR Figure 3.7.2-19 (Sheet 4 of 10)	Security-Related Information
UFSAR Figure 3.7.2-19 (Sheet 5 of 10)	Security-Related Information
UFSAR Figure 3.7.2-19 (Sheet 6 of 10)	Security-Related Information

List of VEGP 3&4 UFSAR and VEGP 3&4 Tier 1 Figures and Sections
Containing Security-Related Information or Proprietary Information

Document	Basis for Withholding
UFSAR Figure 3.7.2-19 (Sheet 7 of 10)	Security-Related Information
UFSAR Figure 3.7.2-19 (Sheet 8 of 10)	Security-Related Information
UFSAR Figure 3.7.2-19 (Sheet 9 of 10)	Security-Related Information
UFSAR Figure 3.7.2-19 (Sheet 10 of 10)	Security-Related Information
UFSAR Figure 3.8.3-1 (Sheet 2 of 7)	Security-Related Information
UFSAR Figure 3.8.3-1 (Sheet 4 of 7)	Security-Related Information
UFSAR Figure 3H.5-1 (Sheet 3 of 3)	Security-Related Information
UFSAR Figure 3H.5-11 (Sheet 1 of 6)	Security-Related Information
UFSAR Figure 3H.5-11 (Sheet 2 of 6)	Security-Related Information
UFSAR Figure 3H.5-11 (Sheet 3 of 6)	Security-Related Information
UFSAR Figure 3H.5-11 (Sheet 4 of 6)	Security-Related Information
UFSAR Figure 3H.5-11 (Sheet 5 of 6)	Security-Related Information
UFSAR Figure 3H.5-16 (Sheet 1 of 2)	Security-Related Information
UFSAR Figure 3H.5-16 (Sheet 2 of 2)	Security-Related Information
UFSAR Figure 6.2.4-5	Security-Related Information
UFSAR Figure 6.2.4-6	Security-Related Information
UFSAR Figure 6.2.4-7	Security-Related Information
UFSAR Figure 6.2.4-8	Security-Related Information
UFSAR Figure 6.2.4-9	Security-Related Information
UFSAR Figure 6.2.4-10	Security-Related Information
UFSAR Figure 6.2.4-11	Security-Related Information
UFSAR Figure 6.2.4-12	Security-Related Information
UFSAR Figure 6.2.4-13	Security-Related Information
UFSAR Figure 6.4-1	Security-Related Information
UFSAR Appendix 7A, Section 7A.2, Page 7A-7	Proprietary Information
UFSAR Appendix 7A, Section 7A.2, Page 7A-8	Proprietary Information
UFSAR Appendix 7A, Section 7A.3, Page 7A-9	Proprietary Information
UFSAR Appendix 7A, Section 7A.3, Page 7A-10	Proprietary Information
UFSAR Appendix 7A, Section 7A.3, Page 7A-11	Proprietary Information
UFSAR Appendix 7A, Figure 7A(3-1), Page 7A-12	Proprietary Information
UFSAR Appendix 7A, Figure 7A(3-2), Page 7A-13	Proprietary Information
UFSAR Appendix 7A, Section 7A.3, Page 7A-14	Proprietary Information
UFSAR Appendix 7A, Section 7A.3, Page 7A-15	Proprietary Information
UFSAR Appendix 7A, Section 7A.3, Page 7A-16	Proprietary Information
UFSAR Appendix 7A, Section 7A.3, Page 7A-17	Proprietary Information
UFSAR Appendix 7A, Section 7A.3, Page 7A-18	Proprietary Information
UFSAR Appendix 7A, Section 7A.3, Page 7A-19	Proprietary Information
UFSAR Appendix 7A, Section 7A.4, Page 7A-21	Proprietary Information
UFSAR Appendix 7A, Section 7A.4, Page 7A-22	Proprietary Information
UFSAR Appendix 7A, Section 7A.7, Page 7A-27	Proprietary Information
UFSAR Appendix 7A, Section 7A.8, Page 7A-31	Proprietary Information
UFSAR Appendix 7A, Section 7A.8, Page 7A-34	Proprietary Information
UFSAR Figure 9A-1 (Sheet 2 of 16)	Security-Related Information
UFSAR Figure 9A-1 (Sheet 3 of 16)	Security-Related Information
UFSAR Figure 9A-1 (Sheet 4 of 16)	Security-Related Information
UFSAR Figure 9A-1 (Sheet 5 of 16)	Security-Related Information

List of VEGP 3&4 UFSAR and VEGP 3&4 Tier 1 Figures and Sections
Containing Security-Related Information or Proprietary Information

Document	Basis for Withholding
UFSAR Figure 9A-1 (Sheet 6 of 16)	Security-Related Information
UFSAR Figure 9A-1 (Sheet 7 of 16)	Security-Related Information
UFSAR Figure 9A-1 (Sheet 8 of 16)	Security-Related Information
UFSAR Figure 9A-1 (Sheet 9 of 16)	Security-Related Information
UFSAR Figure 9A-1 (Sheet 10 of 16)	Security-Related Information
UFSAR Figure 9A-1 (Sheet 11 of 16)	Security-Related Information
UFSAR Figure 9A-1 (Sheet 12 of 16)	Security-Related Information
UFSAR Figure 9A-1 (Sheet 13 of 16)	Security-Related Information
UFSAR Figure 9A-1 (Sheet 14 of 16)	Security-Related Information
UFSAR Figure 9A-1 (Sheet 15 of 16)	Security-Related Information
UFSAR Figure 9A-1 (Sheet 16 of 16)	Security-Related Information
UFSAR Figure 9A-2 (Sheet 1 of 5)	Security-Related Information
UFSAR Figure 9A-2 (Sheet 2 of 5)	Security-Related Information
UFSAR Figure 9A-2 (Sheet 3 of 5)	Security-Related Information
UFSAR Figure 9A-2 (Sheet 4 of 5)	Security-Related Information
UFSAR Figure 9A-2 (Sheet 5 of 5)	Security-Related Information
UFSAR Figure 9A-201	Security-Related Information
UFSAR Figure 9A-3 (Sheet 2 of 3)	Security-Related Information
UFSAR Figure 9A-3 (Sheet 3 of 3)	Security-Related Information
UFSAR Figure 9A-4	Security-Related Information
UFSAR Figure 9A-5	Security-Related Information
UFSAR Figure 12.3-1 (Sheet 2 of 16)	Security-Related Information
UFSAR Figure 12.3-1 (Sheet 3 of 16)	Security-Related Information
UFSAR Figure 12.3-1 (Sheet 4 of 16)	Security-Related Information
UFSAR Figure 12.3-1 (Sheet 5 of 16)	Security-Related Information
UFSAR Figure 12.3-1 (Sheet 6 of 16)	Security-Related Information
UFSAR Figure 12.3-1 (Sheet 7 of 16)	Security-Related Information
UFSAR Figure 12.3-1 (Sheet 8 of 16)	Security-Related Information
UFSAR Figure 12.3-1 (Sheet 9 of 16)	Security-Related Information
UFSAR Figure 12.3-1 (Sheet 10 of 16)	Security-Related Information
UFSAR Figure 12.3-201	Security-Related Information
UFSAR Figure 12.3-1 (Sheet 12 of 16)	Security-Related Information
UFSAR Figure 12.3-1 (Sheet 13 of 16)	Security-Related Information
UFSAR Figure 12.3-1 (Sheet 14 of 16)	Security-Related Information
UFSAR Figure 12.3-1 (Sheet 15 of 16)	Security-Related Information
UFSAR Figure 12.3-1 (Sheet 16 of 16)	Security-Related Information
UFSAR Figure 12.3-2 (Sheet 2 of 15)	Security-Related Information
UFSAR Figure 12.3-2 (Sheet 3 of 15)	Security-Related Information
UFSAR Figure 12.3-2 (Sheet 4 of 15)	Security-Related Information
UFSAR Figure 12.3-2 (Sheet 5 of 15)	Security-Related Information
UFSAR Figure 12.3-2 (Sheet 6 of 15)	Security-Related Information
UFSAR Figure 12.3-2 (Sheet 7 of 15)	Security-Related Information
UFSAR Figure 12.3-2 (Sheet 8 of 15)	Security-Related Information
UFSAR Figure 12.3-2 (Sheet 9 of 15)	Security-Related Information
UFSAR Figure 12.3-2 (Sheet 10 of 15)	Security-Related Information
UFSAR Figure 12.3-202	Security-Related Information

List of VEGP 3&4 UFSAR and VEGP 3&4 Tier 1 Figures and Sections
Containing Security-Related Information or Proprietary Information

Document	Basis for Withholding
UFSAR Figure 12.3-2 (Sheet 12 of 15)	Security-Related Information
UFSAR Figure 12.3-2 (Sheet 13 of 15)	Security-Related Information
UFSAR Figure 12.3-2 (Sheet 14 of 15)	Security-Related Information
UFSAR Figure 12.3-2 (Sheet 15 of 15)	Security-Related Information
UFSAR Figure 12.3-3 (Sheet 2 of 16)	Security-Related Information
UFSAR Figure 12.3-3 (Sheet 3 of 16)	Security-Related Information
UFSAR Figure 12.3-3 (Sheet 4 of 16)	Security-Related Information
UFSAR Figure 12.3-3 (Sheet 5 of 16)	Security-Related Information
UFSAR Figure 12.3-3 (Sheet 6 of 16)	Security-Related Information
UFSAR Figure 12.3-3 (Sheet 7 of 16)	Security-Related Information
UFSAR Figure 12.3-3 (Sheet 8 of 16)	Security-Related Information
UFSAR Figure 12.3-3 (Sheet 9 of 16)	Security-Related Information
UFSAR Figure 12.3-3 (Sheet 10 of 16)	Security-Related Information
UFSAR Figure 12.3-203	Security-Related Information
UFSAR Figure 12.3-3 (Sheet 12 of 16)	Security-Related Information
UFSAR Figure 12.3-3 (Sheet 13 of 16)	Security-Related Information
UFSAR Figure 12.3-3 (Sheet 14 of 16)	Security-Related Information
UFSAR Figure 12.3-3 (Sheet 15 of 16)	Security-Related Information
UFSAR Figure 12.3-3 (Sheet 16 of 16)	Security-Related Information
UFSAR Appendix 19F, Section 19F.4.2, page 19F-3	Security-Related Information
UFSAR Appendix 19F, Section 19F.4.3, page 19F-4	Security-Related Information
Tier 1 Figure 3.3-1	Security-Related Information
Tier 1 Figure 3.3-2	Security-Related Information
Tier 1 Figure 3.3-3	Security-Related Information
Tier 1 Figure 3.3-4	Security-Related Information
Tier 1 Figure 3.3-5	Security-Related Information
Tier 1 Figure 3.3-6	Security-Related Information
Tier 1 Figure 3.3-7	Security-Related Information
Tier 1 Figure 3.3-8	Security-Related Information
Tier 1 Figure 3.3-9	Security-Related Information
Tier 1 Figure 3.3-10	Security-Related Information
Tier 1 Figure 3.3-11A	Security-Related Information
Tier 1 Figure 3.3-11B	Security-Related Information
Tier 1 Figure 3.3-12	Security-Related Information
Tier 1 Figure 3.3-13	Security-Related Information
Tier 1 Figure 3.3-14	Security-Related Information

Southern Nuclear Operating Company

ND-18-0656

Enclosure 3

DVD containing:

**VEGP 3&4 UFSAR, Revision 7 (Public Version)
VEGP 3&4 Tier 1, Revision 6 (Public Version)
VEGP Units 3 and 4 TRM, Revision 7
VEGP Units 3 and 4 TS Bases, Revision 23**

List of Files Contained in DVD

VEGP3&4_UFSAR_CHAP01
VEGP3&4_UFSAR_CHAP02_SEC02.00-02.04
VEGP3&4_UFSAR_CHAP02_SEC02.04A
VEGP3&4_UFSAR_CHAP02_SEC02.04B
VEGP3&4_UFSAR_CHAP02_SEC02.05
VEGP3&4_UFSAR_CHAP02_SEC02.05A-02.05E
VEGP3&4_UFSAR_CHAP03_SEC03.01-03.07
VEGP3&4_UFSAR_CHAP03_SEC03.08
VEGP3&4_UFSAR_CHAP03_SEC03.09-03F
VEGP3&4_UFSAR_CHAP03_SEC03G-03GG
VEGP3&4_UFSAR_CHAP03_SEC03H-03I
VEGP3&4_UFSAR_CHAP04
VEGP3&4_UFSAR_CHAP05
VEGP3&4_UFSAR_CHAP06
VEGP3&4_UFSAR_CHAP07
VEGP3&4_UFSAR_CHAP08
VEGP3&4_UFSAR_CHAP09
VEGP3&4_UFSAR_CHAP10
VEGP3&4_UFSAR_CHAP11
VEGP3&4_UFSAR_CHAP12
VEGP3&4_UFSAR_CHAP13
VEGP3&4_UFSAR_CHAP14
VEGP3&4_UFSAR_CHAP15
VEGP3&4_UFSAR_CHAP16
VEGP3&4_UFSAR_CHAP17
VEGP3&4_UFSAR_CHAP18
VEGP3&4_UFSAR_CHAP19

VEGP3&4_TIER1

VEGP3&4_TRM

VEGP3&4_TSBASES

Total Files Listed: 30 File(s)

Southern Nuclear Operating Company

ND-18-0656

Enclosure 4

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

**Affidavit from Southern Nuclear Operating Company for Withholding
Under 10 CFR 2.390**

**(Updated Final Safety Analysis Report, Tier 1, Technical Requirements Manual and
Technical Specifications Bases Annual Submittal)**

(Enclosure 4 consists of 2 pages, plus this cover page)

ND-18-0656

Enclosure 4

Affidavit from Southern Nuclear Operating Company for Withholding Under 10 CFR 2.390
(Updated Final Safety Analysis Report, Tier 1, Technical Requirements Manual and
Technical Specifications Bases Annual Submittal)

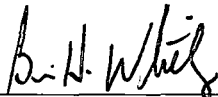
Affidavit of Brian H. Whitley

1. My name is Brian H. Whitley. I am the Regulatory Affairs Director of Southern Nuclear Operating Company (SNC). I have been delegated the function of reviewing proprietary information sought to be withheld from public disclosure and am authorized to apply for its withholding on behalf of SNC.
2. I am making this affidavit on personal knowledge, in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations, and in conjunction with SNC's filing on dockets 52-025 and 52-026, Vogtle Electric Generating Plant Units 3 and 4, Updated Final Safety Analysis Report, Tier 1, Technical Requirements Manual and Technical Specifications Bases Annual Submittal. I have personal knowledge of the criteria and procedures used by SNC to designate information as a trade secret, privileged or as confidential commercial or financial information.
3. Based on the reason(s) at 10 CFR 2.390(a)(4), this affidavit seeks to withhold from public disclosure Enclosure 1 of SNC letter ND-18-0656 for Vogtle Electric Generating Plant Units 3 and 4, Updated Final Safety Analysis Report, Tier 1, Technical Requirements Manual and Technical Specifications Bases Annual Submittal.
4. The following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.
 - a. The information sought to be withheld from public disclosure has been held in confidence by SNC and Westinghouse Electric Company.
 - b. The information is of a type customarily held in confidence by SNC and Westinghouse Electric Company and not customarily disclosed to the public.

Affidavit from Southern Nuclear Operating Company for Withholding Under 10 CFR 2.390
(Updated Final Safety Analysis Report, Tier 1, Technical Requirements Manual and
Technical Specifications Bases Annual Submittal)

- c. The release of the information might result in the loss of an existing or potential competitive advantage to SNC and/or Westinghouse Electric Company.
 - d. Other reasons identified in Enclosure 5 of SNC letter ND-18-0656 for Vogtle Electric Generating Plant Units 3 and 4, Updated Final Safety Analysis Report, Tier 1, Technical Requirements Manual and Technical Specifications Bases Annual Submittal, and those reasons are incorporated here by reference.
5. Additionally, release of the information may harm SNC because SNC has a contractual relationship with the Westinghouse Electric Company regarding proprietary information. SNC is contractually obligated to seek confidential and proprietary treatment of the information.
6. The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.390, it is to be received in confidence by the Commission.
7. To the best of my knowledge and belief, the information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method.

I declare under penalty of perjury that the foregoing is true and correct.



Brian H. Whitley

Executed on 6/15/18
Date

Southern Nuclear Operating Company

ND-18-0656

Enclosure 5

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

**Westinghouse Authorization Letter CAW-17-4589, Affidavit,
Proprietary Information Notice and Copyright Notice
(Updated Final Safety Analysis Report, Tier 1, Technical Requirements Manual and
Technical Specifications Bases Annual Submittal)**

(Enclosure 5 consists of 10 pages, plus this cover page.)



Westinghouse Electric Company
New Plants and Major Projects
1000 Westinghouse Drive, Building 1
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USA

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e-mail: monohajs@westinghouse.com
Proj letter: SVP_SV0_004970

CAW-17-4589

July 25, 2017

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: Transmittal of APP-FSAR-GLN-801, "AP1000 Licensing Applicability Determination and 10 CFR 50.59/10 CFR 52 Appendix D Section VIII Screening: APP-GW-GEE-3001 and 4578, NL-1038" (Proprietary)

The Application for Withholding Proprietary Information from Public Disclosure is submitted by Westinghouse Electric Company LLC ("Westinghouse"), pursuant to the provisions of paragraph (b)(1) of Section 2.390 of the Nuclear Regulatory Commission's ("Commission's") regulations. It contains commercial strategic information proprietary to Westinghouse and customarily held in confidence.

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-17-4589 signed by the owner of the proprietary information, Westinghouse. The Affidavit, which accompanies this letter, sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR Section 2.390 of the Commission's regulations.

Accordingly, this letter authorizes the utilization of the accompanying Affidavit by Southern Nuclear Company.

Correspondence with respect to the proprietary aspects of the Application for Withholding or the Westinghouse Affidavit should reference CAW-17-4589, and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 3 Suite 310, Cranberry Township, Pennsylvania 16066.

Very truly yours,

Jill S. Monahan, Manager

APR1400 and Specialized Seismic Licensing

Westinghouse Non-Proprietary Class 3



Westinghouse Electric Company
New Plants and Major Projects
1000 Westinghouse Drive, Building 1
Cranberry Township, Pennsylvania 16066
USA

Enclosures to CAW-17-4589

1. AFFIDAVIT CAW-17-4589
2. PROPRIETARY INFORMATION NOTICE and COPYRIGHT NOTICE
3. APP-FSAR-GLN-801, "AP1000 Licensing Applicability Determination and 10 CFR 50.59/10 CFR 52 Appendix D Section VIII Screening: APP-GW-GEE-3001 and 4578, NL-1038"
(Proprietary)

ENCLOSURE 1 to CAW-17-4589

AFFIDAVIT

Westinghouse Non-Proprietary Class 3

CAW-17-4589

July 25, 2017

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

ss

COUNTY OF BUTLER:

I, Jill S. Monahan, am authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC ("Westinghouse"), and declare that the averments of fact set forth in this Affidavit are true and correct to the best of my knowledge, information, and belief.

Jill S Monahan

Jill S. Monahan, Manager

APR1400 and Specialized Seismic Licensing

Date: 7-25-2017

- (1) I am Manager, APR1400 and Specialized Seismic Licensing, Westinghouse Electric Company LLC ("Westinghouse"), and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing and rule making proceedings, and am authorized to apply for its withholding on behalf of Westinghouse.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Nuclear Regulatory Commission's ("Commission's") regulations and in conjunction with the Westinghouse Application for Withholding Proprietary Information from Public Disclosure accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by Westinghouse in designating information as a trade secret, privileged or as confidential commercial or financial information.
- (4) Pursuant to the provisions of paragraph (b)(4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.
 - (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by Westinghouse.
 - (ii) The information is of a type customarily held in confidence by Westinghouse and not customarily disclosed to the public. Westinghouse has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The application of that system and the substance of that system constitute Westinghouse policy and provide the rational basis required.

Under that system, information is held in confidence if it falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:

- (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of

Westinghouse's competitors without license from Westinghouse constitutes a competitive economic advantage over other companies.

- (b) It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data secures a competitive economic advantage, e.g., by optimization or improved marketability.
 - (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.
 - (d) It reveals cost or price information, production capacities, budget levels, or commercial strategies of Westinghouse, its customers or suppliers.
 - (e) It reveals aspects of past, present, or future Westinghouse or customer funded development plans and programs of potential commercial value to Westinghouse.
 - (f) It contains patentable ideas, for which patent protection may be desirable.
- (iii) There are sound policy reasons behind the Westinghouse system which include the following:
- (a) The use of such information by Westinghouse gives Westinghouse a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the Westinghouse competitive position.
 - (b) It is information that is marketable in many ways. The extent to which such information is available to competitors diminishes the Westinghouse ability to sell products and services involving the use of the information.
 - (c) Use by our competitor would put Westinghouse at a competitive disadvantage by reducing his expenditure of resources at our expense.

- (d) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving Westinghouse of a competitive advantage.
 - (e) Unrestricted disclosure would jeopardize the position of prominence of Westinghouse in the world market, and thereby give a market advantage to the competition of those countries.
 - (f) The Westinghouse capacity to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.
- (iv) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.390, it is to be received in confidence by the Commission.
- (v) The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of our knowledge and belief.
- (vi) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in APP-FSAR-GLN-801, "AP1000 Licensing Applicability Determination and 10 CFR 50.59/10 CFR 52 Appendix D Section VIII Screening: APP-GW-GEE-3001 and 4578, NL-1038" (Proprietary), for submittal to the Commission, being transmitted by Southern Nuclear Company letter. The proprietary information as submitted by Westinghouse is that associated with review of Licensing Change Package APP-FSAR-GLN-801, and may be used only for that purpose.
- (a) This information is part of that which will enable Westinghouse to:
 - (i) Manufacture and deliver products to utilities based on proprietary designs.

- (b) Further this information has substantial commercial value as follows:
- (i) Westinghouse plans to sell the use of similar information to its customers for the purpose of licensing of new nuclear power stations.
 - (ii) Westinghouse can sell support and defense of industry guidelines and acceptance criteria for plant-specific applications.
 - (iii) The information requested to be withheld reveals the distinguishing aspects of a methodology which was developed by Westinghouse.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse because it would enhance the ability of competitors to provide similar technical evaluation justifications and licensing defense services for commercial power reactors without commensurate expenses. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

The development of the technology described in part by the information is the result of applying the results of many years of experience in an intensive Westinghouse effort and the expenditure of a considerable sum of money.

In order for competitors of Westinghouse to duplicate this information, similar technical programs would have to be performed and a significant manpower effort, having the requisite talent and experience, would have to be expended.

Further the deponent sayeth not.

ENCLOSURE 2 to CAW-17-4589

PROPRIETARY INFORMATION NOTICE and COPYRIGHT NOTICE

PROPRIETARY INFORMATION NOTICE

Transmitted herewith are proprietary and/or non-proprietary versions of documents furnished to the NRC in connection with requests for generic and/or plant-specific review and approval.

In order to conform to the requirements of 10 CFR 2.390 of the Commission's regulations concerning the protection of proprietary information so submitted to the NRC, the information which is proprietary in the proprietary versions is contained within brackets, and where the proprietary information has been deleted in the non-proprietary versions, only the brackets remain (the information that was contained within the brackets in the proprietary versions having been deleted). The justification for claiming the information so designated as proprietary is indicated in both versions by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary or in the margin opposite such information. These lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (4)(ii)(a) through (4)(ii)(f) of the Affidavit accompanying this transmittal pursuant to 10 CFR 2.390(b)(1).

COPYRIGHT NOTICE

The reports transmitted herewith each bear a Westinghouse copyright notice. The NRC is permitted to make the number of copies of the information contained in these reports which are necessary for its internal use in connection with generic and plant-specific reviews and approvals as well as the issuance, denial, amendment, transfer, renewal, modification, suspension, revocation, or violation of a license, permit, order, or regulation subject to the requirements of 10 CFR 2.390 regarding restrictions on public disclosure to the extent such information has been identified as proprietary by Westinghouse, copyright protection notwithstanding. With respect to the non-proprietary versions of these reports, the NRC is permitted to make the number of copies beyond those necessary for its internal use which are necessary in order to have one copy available for public viewing in the appropriate docket files in the public document room in Washington, DC and in local public document rooms as may be required by NRC regulations if the number of copies submitted is insufficient for this purpose. Copies made by the NRC must include the copyright notice in all instances and the proprietary notice if the original was identified as proprietary.