

Vogle PEmails

From: Hoellman, Jordan
Sent: Thursday, August 2, 2018 6:50 AM
To: Vogle PEmails
Subject: NRC Staff Proposed Revision to License Condition 2.D.(13) for LAR-17-037, dated 8/1/18
Attachments: 2018-08-01 PROPOSED REVISION TO SNC LICENSE CONDITION 2.D.(13).pdf

From: Hoellman, Jordan
Sent: Wednesday, August 01, 2018 3:39 PM
Subject: LAR-17-037 - Staff's Proposed License Condition 2.D.(13)

Good Afternoon –

Attached is the latest version of the Proposed License Condition 2.D.(13), with no outstanding issues remaining. I don't anticipate needing to discuss these at tomorrow's public meeting; however, please let us know ASAP if you'd like to discuss this further and can support discussion at the public meeting.

The two outstanding issues I discussed in my email yesterday are addressed below:

There is one clarification we are working on internally related to Criterion 3 (i), where we want to make sure the use of the word "material" in the License Condition is consistent with the guidance you provided in a LAR Supplement that details examples of a "material change". We are meeting internally to discuss this tomorrow and will keep you informed as this develops.

- This is addressed in the attached version by adding "... or the evaluation methods in WCAP-12488, "Westinghouse Fuel Criteria Evaluation Process,"" to the end of Criterion 3 (i).

There was also a question from SNC about a previous version of the License Condition that included a Criterion 10 that has since been removed. I think the previous Criterion 10 got rolled into the revisions to parts (a) and (b) of the License Condition, but we owe you a formal response.

- The previously proposed Criterion 10 is addressed by the revisions to the License Condition parts (a) and (b) and didn't impose any new requirements than those already required.

If you have any questions, please let us know.

Thanks,
Jordan

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STAFF PROPOSED REVISION TO LICENSE CONDITION 2.D.(13)

(13) Departures from certain plant-specific DCD Tier 2* information

- (a) SNC is exempt from the requirements of 10 CFR Part 52, Appendix D, Paragraphs VIII.B.6 and VIII.B.5.a for prior NRC approval of departures from Tier 2* information and departures from Tier 2 information involving a change to or departure from Tier 2* information, *except* for proposed departures that:
1. Involve design methodology or construction materials that deviate from a code or standard credited in the plant-specific DCD for establishing the criteria for the design or construction of a structure, system, or component (SSC) important to safety,
 2. Result in a change to a design process described in the plant-specific DCD that is material to implementation of an industry standard or endorsed regulatory guidance,
 3.
 - (i) Result in a change to the fuel criteria evaluation process, the fuel principal design requirements, or the nuclear design of the fuel and the reactivity control system that is material to a fuel or reactivity control system design function or the evaluation methods in WCAP-12488, "Westinghouse Fuel Criteria Evaluation Process," or
 - (ii) Result in any change to the maximum fuel rod average burn-up limits or the small break LOCA analysis methodology described in UFSAR Subsections 15.6.5.4B.2.2 or 15.6.5.4B.2.3,
 4. Adversely affect the containment debris limits or debris screen design criteria,
 5. Change the Reactor Coolant Pump (RCP) type from a canned motor to a different type of RCP,
 6. Result in a material change to the test objectives or test performance criteria the Passive Residual Heat Removal Heat Exchanger natural circulation test (first plant test), the Core Makeup Tank Heated Recirculation Tests (first three plants test), or the Automatic Depressurization System Blowdown Test (first three plants test),
 7. Involve structural materials or analytical or design methods, including design codes and analytical assumptions, that deviate from those credited in the plant-specific DCD for critical sections,
 8. Result in a change to the design of the steel faceplates, internal trusses, tie bars, or headed studs of the steel-concrete (SC) module walls in the Nuclear Island or the Shield Building, including SC-to-reinforced concrete (RC) connections,

9. Result in an increase in the demand to capacity (D/C) ratio of a critical section of the structure. SNC shall determine the D/C ratio under this condition for each critical section structural member including, but not limited to, wall segments, wall sections, concrete panels, slabs, or basemat sections, affected by a departure by:
- (i) Using the Tier 2* information in the UFSAR Section 3.8 or Appendix 3H Table that directly states the D/C ratio or states the area of steel provided and the area of steel required for the affected structural member, or
 - (ii) Providing the same total area of steel across the entire critical section using any combination of rebar sizes and spacing allowed by the design basis codes used in the UFSAR as the total area of steel specified in UFSAR Section 3.8 and Appendix 3H Tables marked Tier 2*;
- (b) For a departure from Tier 2* information that does not require prior NRC approval under the exemption in License Condition 2.D.(13)(a), SNC may take the departure under and in compliance with the Tier 2 change processes in 10 CFR Part 52, Appendix D, Paragraph VIII.B.5, as modified by the exemption in License Condition 2.D.(13)(a). For each departure authorized by this License Condition:
- 1. The departure or change to Tier 2* information shall remain Tier 2* information in the plant-specific DCD.
 - 2. SNC shall prepare and maintain a written evaluation that provides the bases for its determinations regarding the criteria in License Condition 2.D.(13)(a). In the report that 10 CFR Part 52, Appendix D, Section X.B.1 requires SNC to submit, SNC shall include a brief description of each departure and a summary of the evaluation of the departure.