

August 9, 2018

Docket Nos.: 52-025
52-026

ND-18-1049
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-17-024S4)**

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] and supplemented by SNC letter ND-18-0058, dated January 23, 2018 [ADAMS Accession No. ML18023A440], by SNC letter ND-18-0364, dated March 23, 2018 [ADAMS Accession No. ML18082B370], and by SNC letter ND-18-0871, dated June 21, 2018 [ADAMS Accession No. ML18172A154].

Enclosures 1 through 3 were provided with the original License Amendment Request (LAR), Enclosures 4 and 5 were provided with the first LAR supplement, Enclosures 6 through 8 were provided with the second LAR supplement, and Enclosures 9 through 11 were provided with the third LAR supplement.

Enclosure 12 of this letter provides a response to NRC Staff Request for Additional Information (RAI) #4 issued as final on July 17, 2018 (based on a clarification call held on July 12, 2018 regarding the draft RAI received July 11, 2018) [ADAMS Accession No. ML18197A188].

The information provided in this LAR supplement does not expand the scope of the request or alter the conclusions of the Significant Hazards Consideration Determination or Environmental Considerations submitted in the original LAR-17-024, provided in Enclosure 1 of SNC letter ND-17-1279.

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

SNC now requests NRC staff approval of this license amendment by September 14, 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 enclosure to the designated State Official

Should you have any questions, please contact Mr. Ryan Henderson at (205) 992-6426.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 9th Day of August 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)
 - 4) – 5) (previously submitted as supplemental information with LAR-17-024S1 in SNC letter ND-18-0058)
 - 6) – 8) (previously submitted as supplemental information with LAR-17-024S2 in SNC letter ND-18-0364)
 - 9) – 11) (previously submitted as supplemental information with LAR-17-024S3 in SNC letter ND-18-0871)
 - 12) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Response to NRC Request for Additional Information #4 (LAR-17-024S4)

cc:

Southern Nuclear Operating Company / Georgia Power Company

Mr. S. E. Kuczynski (w/o enclosure)
Mr. D. G. Bost (w/o enclosure)
Mr. M. D. Meier (w/o enclosure)
Mr. D. H. Jones (w/o enclosure)
Mr. J. B. Klecha
Mr. G. Chick
Mr. D. L. McKinney (w/o enclosure)
Mr. T. W. Yelverton (w/o enclosure)
Mr. B. H. Whitley
Ms. C. A. Gayheart
Mr. C. R. Pierce
Ms. A. G. Aughtman
Mr. D. L. Fulton
Mr. M. J. Yox
Mr. E. W. Rasmussen
Mr. J. Tupik
Mr. W. A. Sparkman
Ms. A. C. Chamberlain
Ms. A. L. Pugh
Ms. P. Reister
Document Services RTYPE: VND.LI.L00
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Nuclear Regulatory Commission

Mr. W. Jones (w/o enclosure)
Ms. J. Dixon-Herrity
Mr. C. Patel
Ms. J. M. Heisserer
Mr. B. Kemker
Mr. G. Khouri
Ms. S. Temple
Mr. F. Brown
Mr. T.E. Chandler
Ms. P. Braxton
Mr. T. Brimfield
Mr. C. J. Even
Mr. A. Lerch

State of Georgia

Mr. R. Dunn

Oglethorpe Power Corporation

Mr. M. W. Price
Ms. A. Whaley

Municipal Electric Authority of Georgia

Mr. J. E. Fuller
Mr. S. M. Jackson

Dalton Utilities

Mr. T. Bundros

Westinghouse Electric Company, LLC

Mr. L. Oriani (w/o enclosure)
Mr. C. Churchman (w/o enclosure)
Mr. M. Corletti
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
Ms. S. W. Kernizan, Georgia Public Service Commission
Mr. K. C. Greene, Troutman Sanders
Mr. S. Blanton, Balch Bingham
Mr. R. Grumbir, APOG
NDDocumentinBox@duke-energy.com, Duke Energy
Mr. S. Franzone, Florida Power & Light

Southern Nuclear Operating Company

ND-18-1049

Enclosure 12

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

**Response to NRC Request for Additional Information #4
(LAR-17-024S4)**

(This Enclosure consists of 3 pages, including this cover page)

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 "L07" on Page 11 of 39 and Page 24 of 39 of Enclosure 1 proposed a change to Technical Specification (TS) Table 3.3.5-1. Subsequently, the change was revised by LAR-17-024S3 via SNC letter ND-18-0871 on June 21, 2018 [LAR-17-024S1 and LAR-17-024S2 did not affect this portion of the request].

On July 11, 2018, the NRC transmitted a draft Request for Additional Information for discussion on the July 12, 2018 public call. On July 17, 2018, the NRC issued the draft RAI as final.

QUESTION

Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.90, "Application for amendment of license, construction permit or early site permit," requires, in part, that a license amendment fully describe the changes desired. In addition, 10 CFR 50.36, "Technical Specifications," sets forth requirements for technical specifications to be included as part of the operating license for a nuclear power facility. However, the information within the technical evaluation presented in Item L07 of LAR-17-024 is insufficient for the staff to reach a conclusion on the application. The information contained in the technical evaluation appears to be inconsistent with the previously docketed material submitted by SNC. Given a lack of sufficient information in LAR-17-024, staff considered previously docketed material, and seeks clarification of the licensee's request related to Item L07.

For example, for Function 4 of Technical Specification (TS) Table 3.3.5-1, LAR 17-024 proposes to change the language in the "REQUIRED CHANNELS" column from "2 switch sets," to "2." However, the technical evaluation first indicates that there are two sets of redundant switches, one on the Primary Dedicated Safety Panel (PDSP) and one on the Secondary Dedicated Safety Panel (SDSP). Then, in the second paragraph, the applicant indicates that the Protection and Safety Monitoring System design provides two redundant controls on the PDSP, with no corresponding controls on the SPDS. In the case of L07, the staff understands there to be two redundant switches located on the PDSP for Function 4, such that, when either is operated this will cause Function 4 to actuate.

The staff requests that SNC provide additional information that clarifies the licensee's request regarding Function 4 stated above. The staff specifically seeks clarity on the operation of the "Reactor Trip System Manual Actuation" function via the "Core Makeup Tank Actuation Input from Engineered Safety Feature Actuation System - Manual" function (Function 4 in TS Table 3.3.5-1).

RESPONSE

For the "Core Makeup Tank Actuation Input from Engineered Safety Feature Actuation System - Manual" function (Function 4 in TS Table 3.3.5-1), there are redundant switches on the PDSP, either of which will initiate manual core makeup tank injection and also send a reactor trip signal to the reactor trip switchgear breakers. Since either switch will initiate the reactor trip signal, the term switch set does not apply. Therefore, it is proposed to change the "REQUIRED CHANNELS" column from "2 switch sets" to "2."

As discussed in LAR-17-024S3, the changes to Function 1 and Function 2 were withdrawn.

The technical evaluation from LAR-17-024, as supplemented by LAR-17-024S3, is revised in the section below to reflect the above RAI Response. This revision will be provided without tracking the language which is withdrawn or added in order to be as clear as possible. Enclosure 10 to ND-18-0871 (LAR-17-024S3) still provides the appropriate markup to TS Table 3.3.5-1 and reflects this discussion.

CHANGES TO ORIGINAL LAR-17-024 AND LAR-17-024S3

L07	Detailed Description
3.3.5-3	Change Table 3.3.5-1, Function 4, Core Makeup Tank Actuation Input from Engineered Safety Feature Actuation System – Manual Required Channels from “2 switch sets” to “2.”
LR	Technical Evaluation For the “Core Makeup Tank Actuation Input from Engineered Safety Feature Actuation System - Manual” function (Function 4 in TS Table 3.3.5-1), there are redundant switches on the PDSP, either of which will initiate manual core makeup tank injection and also send a reactor trip signal to the reactor trip switchgear breakers. Since either switch will initiate the reactor trip signal, the term switch set does not apply. Therefore, it is proposed to change the “REQUIRED CHANNELS” column from “2 switch sets” to “2.”