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August 31, 2018

Docket Nos.: 52-025  
52-026

ND-18-1121  
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  
Preliminary Amendment Request (PAR):  
Administrative Changes to Align Initial Test Program (ITP) with  
Regulatory Guide 1.68 (PAR-18-024)

Ladies and Gentlemen:

The U.S. Nuclear Regulatory Commission (NRC) issued the Vogtle Electric Generating Plant (VEGP) Units 3 and 4 combined licenses (COLs) (License Numbers NPF-91 and NPF-92, respectively) to Southern Nuclear Operating Company (SNC) on February 12, 2012.

SNC submitted a License Amendment Request (LAR) and exemption request, LAR-18-024 on August 30, 2018, by SNC letter ND-18-1120 [ADAMS Accession Number ML18242A039]. The LAR proposes to revise administrative aspects of the Initial Test Program (ITP) described in the VEGP 3 and 4 Updated Final Safety Analysis Report (UFSAR) and associated Tier 1 material. The change would involve removing component testing as a phase of the ITP in order to better align with Regulatory Guide 1.68. SNC is submitting a Preliminary Amendment Request (PAR), PAR-18-024, to avoid significant loss of efficiency related to component testing. The determination of whether the NRC has any objection to SNC proceeding with testing consistent with the proposed plant licensing basis changes is needed on or before October 1, 2018.

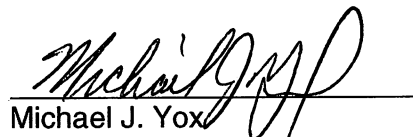
A description of the requested change and the reason for the change are contained in Enclosure 1 to this letter. This PAR has been developed in accordance with guidance provided in the most recent revision to the Interim Staff Guidance on Changes during Construction Under 10 CFR Part 52, COL-ISG-25 [ADAMS Accession Number ML13045A125] and corresponds accurately and technically with the above-mentioned LAR-18-024. The technical scope of this PAR is consistent with the technical scope of the submitted LAR. Section 7 of Enclosure 1 identifies the scope of the "no objection" sought in this PAR.

This letter does not contain any regulatory commitments. This letter has been reviewed and confirmed to not contain security-related information.

Should you have any questions, please contact Ms. Kelli Roberts at 706-848-6991.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 31st of August 2018.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael J. Yox", is written over a horizontal line.

Michael J. Yox  
Regulatory Affairs Director  
Vogtle 3&4  
Southern Nuclear Operating Company

Enclosure 1)

Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Preliminary  
Amendment Request: Administrative Changes to Align Initial Test  
Program (ITP) with Regulatory Guide 1.68 (PAR-18-024)

MJY/LRG/amm

cc:

Southern Nuclear Operating Company / Georgia Power Company

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**Southern Nuclear Operating Company**

**ND-18-1121**

**Enclosure 1**

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

**Preliminary Amendment Request:**

**Administrative Changes to Align Initial Test Program (ITP) with Regulatory Guide 1.68  
(PAR-18-024)**

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

## PAR-18-024: Administrative Changes to Align Initial Test Program (ITP) with Regulatory Guide 1.68

In accordance with the provisions of 10 CFR 50.90, Southern Nuclear Operating Company (SNC) submitted License Amendment Request (LAR)-18-024 to change the Vogtle Electric Generating Plant (VEGP), Units 3 and 4, licensing basis documents associated with Combined License Nos. NPF-91 and NPF-92, respectively. Accordingly, SNC requests the determination of whether the NRC has any objection to proceeding with testing consistent with the proposed removal of component testing as a phase of the initial test program (ITP), which would further align the ITP with Regulatory Guide 1.68.

Removal of component testing as a phase of the ITP is subject to the changes proposed in LAR-18-024. As the nature of the workforce transitions from one used for concrete placement and steel erection to one more related to electrical and instrumentation installation and testing, the need to perform component tests prior to turnover from construction to ITP will increase. Because these component tests are currently required to be performed after turnover from construction, there is increased opportunity to complete testing of components on an accelerated schedule (i.e., prior to turnover). Accordingly, SNC requests the determination of whether the NRC has any objection to proceeding with testing consistent with the proposed removal of component testing as a phase of the ITP as identified below.

PAR Request Number: <b>SNC PAR-18-024</b>	Station Name: <b>VEGP</b>	Unit Number(s): <input checked="" type="checkbox"/> 3 <input checked="" type="checkbox"/> 4	PAR Request Date: <b>October 1, 2018</b>
1. NRC PAR Notification Requested Date (see Block 7 for basis): October 1, 2018			
2. License Amendment Request References (as applicable): <input checked="" type="checkbox"/> LAR submittal date and SNC Correspondence Number: LAR-18-024 – August 30, 2018 / ND-18-1120 <input type="checkbox"/> Expected LAR submittal date:			
3. Brief Description of Proposed Change:  The proposed amendment would impact Tier 1 with regard to commitments described in the VEGP 3 and 4 Updated Final Safety Analysis Report (UFSAR) related to the Initial Test Program (ITP). No ITAAC changes are proposed. Currently, Tier 1, Section 3.4, states that the initial test program is performed after turnover from construction. The proposed changes remove component testing as a phase of the ITP such that the licensing basis ITP consists only of preoperational and startup testing, which is consistent with Regulatory Guide (RG) 1.68, <i>Initial Test Programs for Water-Cooled Nuclear Power Plants</i> , Revision 3, [ADAMS Accession Number ML070260039]. Therefore, there would be no need to wait for turnover from construction to the ITP because component testing is a subset of construction testing.  Tier 1 currently states that the ITP is performed after turnover from construction. RG 1.68 notes the initial test program consists of preoperational and startup testing but does not address sequencing of testing with regard to turnover from construction. This change does not affect the health and safety of the public because construction and related component testing, although not controlled by the ITP, is conducted under 10 CFR Part 50, Appendix B, and NQA-1 1994 (see UFSAR Sections 17.1 and 17.5).			

**4. Reason for License Amendment Request:**

This change is needed to align the licensing basis with RG 1.68. The current licensing basis is more restrictive in terms of sequence of testing and testing controls of the component test program than what is provided in the guidance from RG 1.68. Further aligning the licensing basis with RG 1.68 will allow for component tests to be completed before full jurisdictional turnover from construction, which in turn allows for early detection of issues on various components.

**5. Is Exemption Request Required?** ☒ Yes ☐ No

**If Yes, Briefly Describe the Reason for the Exemption.** The request for exemption proposes changes to Tier 1 Section 3.4 that would redefine the ITP scope to consist of preoperational and startup testing, which is consistent with RG 1.68. Discussions of test specifications and test procedures are changed to refer only to test procedures, which is also consistent with RG 1.68. Further aligning the licensing basis with RG 1.68 will allow for component tests to be completed before full jurisdictional turnover from construction, which in turn allows for early detection of issues on various components.

**6. Identify Applicable Precedents:** No precedents identified.**7. Impact of Change on Installation and Testing Schedules:**

There is no direct impact to the construction schedule. However, there are components that are currently available for testing but have not yet been turned over from construction. The scope of the "no objection" letter includes components that could be tested immediately without turnover from construction. Examples of these types of components include, but not are limited to, potential transformers, current transformers, control circuits, relays, and valves. Such component tests could proceed prior to turnover and would not be required to be performed under the administrative control of the ITP.