

## Vogtle PEmails

---

**From:** Dixon-Herrity, Jennifer  
**Sent:** Tuesday, September 11, 2018 4:05 PM  
**To:** Sparkman, Wesley A.  
**Cc:** Habib, Donald; Patel, Chandu; Vogtle PEmails  
**Subject:** LAR 17-037 Final Suggested Change to License Condition

Here is the proposed wording that I promised along with a short basis for the requested change:

- “(i) Result in a change to the fuel criteria evaluation process, the fuel principal design requirements, or the nuclear design of the fuel or the reactivity control system that is material to a fuel or reactivity control system design function, or the evaluation **process methods** in WCAP-12488, “Westinghouse Fuel Criteria Evaluation Process,” or”

Basis: The rationale for this change is that the WCAP includes other aspects of the process that would not be considered “methods” as defined in the NEI guidance (such as acceptance limits, design criteria, design parameters, etc. These are all encompassed by the word “process”, which is used both by Westinghouse to describe those aspects, and by the staff’s SER. This wording change is not inconsistent with the intent of the LC as discussed between Southern and staff during various public phone calls/meetings, so it should not impact how they had planned to implement this.

- “(ii) Result in any change to the maximum fuel rod average burn-up limits; or the small break LOCA analysis **information methodology described** in UFSAR Subsections 15.6.5.4B.2.2 or 15.6.5.4B.2.3,”

Basis: This change is needed because the word “methodology” is specifically defined in the NEI guidance to not include input parameters. In the Tier 2\* item on the SBLOCA analysis “method”, part of the Tier 2\* description regards specific input parameters to use. Absent this change in language, staff believes someone could interpret (ii) to permit a change to the input parameters as long as the rest of the Tier 2\* description about the method remained unchanged. We discussed that the input parameters are considered by NRC as part of the method for this specific case, as documented in multiple ACRS meetings and other staff documents at the time, and Southern understood NRC’s position during that phone call. This is considered a clarification to the LC to ensure that all of the words of that specific Tier 2\* item cannot be changed under the amended change process, not only those that would fall under the NEI guidance definition of a methodology

Please let Don, Chandu, or I know of concerns and whether we should look to set up a clarification call. Thank you,

Jen

Jennifer L. Dixon-Herrity  
Chief, Licensing Branch 4  
Division of New Reactor Licensing  
Office of New Reactors  
301-415-2967

**Hearing Identifier:** Vogtle\_COL\_Docs\_Public  
**Email Number:** 365

**Mail Envelope Properties** (BLUPR09MB0803F7F1DB9919E8B7227810DC040)

**Subject:** LAR 17-037 Final Suggested Change to License Condition  
**Sent Date:** 9/11/2018 4:04:37 PM  
**Received Date:** 9/11/2018 4:04:45 PM  
**From:** Dixon-Herrity, Jennifer

**Created By:** Jennifer.Dixon-Herrity@nrc.gov

**Recipients:**

"Habib, Donald" <Donald.Habib@nrc.gov>  
Tracking Status: None  
"Patel, Chandu" <Chandu.Patel@nrc.gov>  
Tracking Status: None  
"Vogtle PEmails" <Vogtle.PEmails@nrc.gov>  
Tracking Status: None  
"Sparkman, Wesley A." <WASPARKM@southernco.com>  
Tracking Status: None

**Post Office:** BLUPR09MB0803.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	2517	9/11/2018 4:04:45 PM

**Options**

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