

October 10, 2019

Docket Nos.: 52-025
52-026

ND-19-1023
10 CFR 50.90
10 CFR 52.63

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

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4
Revision to Request for License Amendment and Exemption:
Consolidation of Structural Building ITAAC (LAR-19-005R1)

Ladies and Gentlemen:

By letter dated March 29, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19088A274) Southern Nuclear Operating Company (SNC), the licensee for Vogtle Electric Generating Plant (VEGP) Units 3 and 4, requested an amendment to Combined License (COL) Numbers NPF-91 and NPF-92, for VEGP Units 3 and 4 (respectively). The requested amendment included changes to the VEGP Unit 3 and Unit 4 COL Appendix C (and corresponding plant-specific DCD Tier 1) information. Pursuant to the provisions of 10 CFR 52.63(b)(1), an exemption from elements of the design as certified in the 10 CFR Part 52, Appendix D, design certification rule was also requested for the plant-specific Tier 1 material departures.

The License Amendment Request (LAR) proposed the consolidation of certain building and structure related Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC). Specifically, SNC has determined that some building and structure related ITAAC Acceptance Criteria are duplicative. To correct this condition, SNC proposed to revise COL Appendix C (and plant-specific Tier 1 information) to consolidate duplicative ITAAC Acceptance Criteria for certain structures and clarify that evaluations of thickness deviations would be included in the reconciliation and thickness reports described in ITAAC Acceptance Criteria.

This revision to LAR-19-005 is being submitted to address comments provided by the U. S. Nuclear Regulatory Commission (NRC) staff during July 10, 2019, August 15, 2019 and September 10, 2019 public meetings and in draft Requests for Additional Information (RAIs) dated July 9, 2019, August 1, 2019 and September 5, 2019. Enclosures 1, 2, and 3 of LAR-19-005 are replaced in their entirety with Enclosures 4, 5, and 6 of this revised amendment request. Revision bars in the right-hand margin indicate the differences between Enclosures 1 and 4 and Enclosures 2 and 5. In addition, SNC's response to the draft RAI is provided in Enclosure 7 to this letter.

Enclosure 4 provides the description, technical evaluation, regulatory evaluation (including the significant hazards consideration), and environmental considerations for the proposed changes.

Enclosure 5 provides the background and supporting basis for the requested exemption. Enclosure 6 provides the proposed license basis changes. Enclosure 7 provides the draft NRC RAI and SNC's response.

The Enclosures to this letter have been reviewed and confirmed to not contain security-related information. This letter contains no regulatory commitments.

The revised information provided in the enclosures does not change the scope of the requested license amendment or exemption, nor does it change the conclusions in the Technical Evaluation or the conclusions in the No Significant Hazards Consideration Determination.

SNC requests staff approval of this revised license amendment by November 15, 2019 to support closure of VEGP Units 3 and 4 ITAAC. Approval by this date will allow sufficient time to implement the licensing basis changes prior to the associated ITAAC activity. SNC expects to implement this proposed amendment (through incorporation into the licensing basis documents) within 30 days of approval of the requested changes.

In accordance with 10 CFR 50.91, SNC is notifying the State of Georgia of this LAR by transmitting a copy of this letter and enclosures to the designated State Official.

Should you have any questions, please contact Mr. Nicholas Kellenberger at (706) 437-2333.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 10th day of October 2019.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

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

MJY/RAS/sfr

Enclosures: 1)-3) Provided with original submittal.

- 4) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Revised Request for License Amendment: Consolidation of Structural Building ITAAC (LAR-19-005R1)
- 5) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Revised Exemption Request: Consolidation of Structural Building ITAAC (LAR-19-005R1)
- 6) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Revised Proposed Changes to the Licensing Basis Documents (LAR-19-005R1)
- 7) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Response to Draft Request for Additional Information, dated August 1, 2019

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