

October 31, 2019

Docket Nos.: 52-025  
52-026

ND-19-1292  
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  
Request for License Amendment and Exemption:  
PCS Wetted Perimeter Test Modification (LAR-19-018)

Ladies and Gentlemen:

Pursuant to 10 CFR 52.98(c) and in accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC), the licensee for Vogtle Electric Generating Plant (VEGP) Units 3 and 4, requests an amendment to Combined License Numbers NPF-91 and NPF-92, for VEGP Units 3 and 4, respectively. The requested amendment proposes changes to the VEGP Unit 3 and Unit 4 COL Appendix C, with corresponding changes to the associated plant specific Tier 1 information and involves associated Tier 2 information in the Updated Final Safety Analysis Report (UFSAR) (which includes the plant specific DCD Tier 2 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 is also requested for the plant-specific Tier 1 material departures.

This License Amendment Request (LAR) proposes to modify Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) regarding the performance of the Passive Containment Cooling System (PCS) Wetted Perimeter Test. Specifically, SNC has determined that performing the test at the current spring line location causes difficulties with the installation of the PCS air baffles. To correct this condition, SNC proposes to revise COL Appendix C (and plant-specific Tier 1 information) and involved Tier 2 information to perform the test above the baffle spring line.

Enclosure 1 provides the description, technical evaluation, regulatory evaluation (including the Significant Hazards Consideration Determination), and environmental considerations for the proposed change.

Enclosure 2 provides the background and supporting basis for the requested exemption.

Enclosure 3 provides the proposed changes to the VEGP Unit 3 and Unit 4 licensing basis documents.

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

SNC requests staff approval of this license amendment by March 31, 2020 to support preparation of the test procedure and 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.

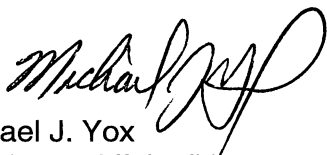
In accordance with 10 CFR 50.91, SNC is notifying the State of Georgia of this LAR by transmitting a copy of this letter and enclosures to the designated State Official.

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 31<sup>st</sup> day of October 2019.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

A handwritten signature in black ink, appearing to read "Michael J. Yox", with a stylized flourish at the end.

Michael J. Yox  
Regulatory Affairs Director  
Vogtle 3 & 4

MJY/SMU/sfr

- Enclosures: 1) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 - Request for License Amendment: PCS Wetted Perimeter Test Modification (LAR-19-018)
- 2) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 - Exemption Request: PCS Wetted Perimeter Test Modification (LAR-19-018)
- 3) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 - Proposed Changes to the Licensing Basis Documents (LAR-19-018)

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cc:

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