

November 13, 2019

Docket No.: 52-025

ND-19-1388
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 Unit 3
Preliminary Amendment Request (PAR):
Tornado Missile Protection for Main Steam Vent Stacks and Wall 11 (PAR-19-014)**

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 10, 2012.

By SNC letter ND-19-0855, dated August 16, 2019, SNC submitted License Amendment Request (LAR), LAR-19-014 (ADAMS Accession Number ML19228A241), to revise information in the VEGP Units 3 and 4 licensing basis documents. The LAR proposes to depart from Tier 2 information in the Updated Final Safety Analysis Report (UFSAR) (which includes the plant-specific Design Control Document (DCD) information) to change the evaluation of the auxiliary building main steam safety valve (MSSV) vent stack openings and the auxiliary building Wall 11 openings for protection from tornado-generated missiles.

SNC is submitting this Preliminary Amendment Request (PAR), PAR-19-014, to minimize construction delays for VEGP Unit 3 during the NRC's evaluation of the related LAR. The determination of whether the NRC has any objection to SNC proceeding with construction based on the proposed licensing basis changes identified in the LAR is requested on or before January 11, 2020. Delayed determination regarding this PAR could result in delay of erection of a steel missile barrier in the turbine building at elevation 100'-0" in front of the Wall 11 door to Room 12306.

A description of the proposed change and the reason for the change are contained in the Enclosure 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-025 [ADAMS Accession Number ML15058A377] and corresponds accurately and technically with the above-mentioned LAR-19-014. The technical scope of this PAR is consistent with the subject LAR. Section 7 of the Enclosure further identifies and details the scope of the "no objection" finding sought in this PAR.

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

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 13th of November 2019.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "B. H. Whitley", is written over a horizontal line.

Brian H. Whitley
Director, Regulatory Affairs
Southern Nuclear Operating Company

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 – Preliminary Amendment Request:
Tornado Missile Protection for Main Steam Vent Stacks and Wall 11 (PAR-19-014)

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Southern Nuclear Operating Company

ND-19-1388

Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3

Preliminary Amendment Request:

**Tornado Missile Protection for Main Steam Vent Stacks and Wall 11
(PAR-19-014)**

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

Pursuant to 10 CFR 52.98(c) and in accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC) submitted license amendment request (LAR)-19-014 to change the Vogtle Electric Generating Plant (VEGP) Unit 3 and 4 licensing basis documents associated with Combined License Nos. NPF-91 and NPF-92.

Accordingly, SNC requests the determination of whether the NRC has any objection to SNC proceeding with construction of VEGP Unit 3 Wall 11 tornado missile protection, which is subject to the changes proposed in LAR-19-014. Delayed determination regarding this Preliminary Amendment Request (PAR) will result in delay in the construction completion of VEGP Unit 3, as identified in the PAR provided below, to be provided by the date shown below.

PAR Request Number: SNC PAR-19-014	Station Name: VEGP	Unit Number(s): <input checked="" type="checkbox"/> 3 <input type="checkbox"/> 4	PAR Request Date: November 13, 2019
1. NRC PAR Notification Requested Date (see Block 7 for basis): January 11, 2020			
2. License Amendment Request References (as applicable): <input checked="" type="checkbox"/> LAR submittal date and SNC Correspondence Number: LAR-19-014 – August 16, 2019 / ND-19-0855 <input type="checkbox"/> Expected LAR submittal date: _____			
3. Brief Description of Proposed Change: The proposed change would revise licensing basis information in the Updated Final Safety Analysis Report (UFSAR) Tier 2 information (plant-specific DCD), to change the evaluation of the auxiliary building main steam safety valve (MSSV) vent stack openings and the auxiliary building Wall 11 openings for protection from tornado-generated missiles. The changes include the evaluation of horizontal missiles targeting the MSSV vent stacks, the evaluation of vertical missiles targeting the MSSV vent stack openings, and the evaluation of missiles targeting the auxiliary building Wall 11 openings. A steel missile barrier is proposed to be added in the turbine building first bay, in support of these evaluations, to eliminate the line of sight into Room 12306 and prevent sphere and artillery missiles from penetration. The missile barrier is designed in accordance with AISC N690-1994 and meets UFSAR Subsection 3.5.3 requirements. The evaluations demonstrate that the tornado missiles will not prevent safe shutdown and will not result in an offsite release exceeding the limits in 10 CFR 50.34. The proposed change impacts UFSAR Tier 2 information in Subsection 3.5.2 and 10.3.2.2.2, and Table 3.5-1.			
4. Reason for License Amendment Request: No change is made to Tier 1, Tier 2*, or COL information; however this change involves a revision to plant-specific Tier 2 information that meets the criteria for a license amendment under 10 CFR Part 52, Appendix D, Section VIII.B.5.b(8) in that it was determined that the proposed change would result in a departure from a method of			

<p>evaluation described in the plant-specific DCD used in establishing the design bases or in the safety analyses, and thus requires NRC approval for the Tier 2 departures.</p> <p>Additional details are provided in the referenced LAR (LAR-19-014).</p>
<p>5. Is Exemption Request Required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If Yes, Briefly Describe the Reason for the Exemption.</p> <p>No exemption required for the PAR.</p>
<p>6. Identify Applicable Precedents:</p> <p>No precedent identified.</p>
<p>7. Impact of Change on Installation and Testing Schedules:</p> <p>A delayed determination regarding this PAR will result in delay of a steel missile barrier installation in the VEGP Unit 3 turbine building first bay at elevation 100'-0" in front of the Wall 11 door to Room 12306, as discussed below.</p> <p>As such, this PAR requests a "no objection" finding related to the changes described in LAR-19-014 by the date identified in Block 1 above (or sooner if reasonably achievable) to allow for appropriate notifications and release of further activities dependent on construction of the VEGP Unit 3 turbine building first bay, as noted below.</p> <p>Specifically, SNC is requesting a "no objection" finding to allow:</p> <ul style="list-style-type: none">• Steel missile barrier installation in the VEGP Unit 3 turbine building first bay at elevation 100'-0" in front of the Wall 11 door to Room 12306 <p>Construction holds have been issued for these activities.</p> <p>A "no objection" finding for the above activities would allow for VEGP Unit 3 construction activities to proceed.</p>
<p>8. Impact of Change on ITAAC:</p> <p>Not applicable.</p>
<p>9. Additional Information:</p> <p>None</p>