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Georgia Power

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U. S. Nuclear Regulatory Commission  
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Reference: Vogtle Electric Generating Plant - Unit 2; 50-425  
Certification to Requirements of 10 CFR 20, 50, 51, and 100  
Safety Evaluation Report - VEGP; NUREG-1173, dated June 1985

In Section 1.1 of the referenced document the NRC requested that GPC certify that Vogtle Unit 2 is designed, constructed, and tested in accordance with 10 CFR 20, 50, 51, and 100 and conforms with the FSAR and other licensing documents.

Regulations controlling the design, construction, testing, and operation of nuclear power plants are contained in the Code of Federal Regulations (CFR) Title 10, Parts 20, 50, 51, and 100. The Vogtle Electric Generating Plant (VEGP) conforms with these regulations as described in the Final Safety Analysis Report (FSAR), Environmental Report (ER), and the Technical Specifications. The FSAR was prepared using the guidance of Regulatory Guide 1.70, Revision 3 and the Standard Review Plans, NUREG-0800. The ER was prepared using guidance of Regulatory Guide 4.2 and the Technical Specifications using the guidance of NUREG-0452. The FSAR, ER, and Technical Specifications thus contain sufficient information, as determined by the Nuclear Regulatory Commission (NRC), to demonstrate compliance with the applicable regulations. Specific information concerning how the regulations were applied is provided in the attachment to this letter.

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ATTACHMENT

APPLICATION OF 10 CFR 20 TO VEGP

<u>Regulation</u> <u>(10 CFR)</u>	<u>Application to VEGP</u>
20.1(a)	This regulation states the general purpose for which the Part 20 regulations were established and does not impose any independent obligations on licensees.
20.(b)	This regulation describes the overall purpose of the Part 20 regulations; to control the possession, use, and transfer of licensed material by any licensee, such that the total dose to an individual will not exceed the standards prescribed therein. It does not impose any independent obligations on licensees.
20.1(c)	Conformation to the as low as reasonably achievable (ALARA) principle stated in this regulation is ensured by the implementation of Georgia Power Company (GPC) policies and appropriate technical specifications and health physics procedures. Chapter 12 of the FSAR describes the specific equipment and design features utilized in this effort.
20.2	This regulation establishes the applicability of the Part 20 regulations and imposes no independent obligations on those licensees to which they apply.
20.3	The definitions contained in this regulation are adhered to in appropriate technical specifications and procedures and in applicable sections of the FSAR.
20.4	The units of radiation dosage specified in this regulation are acceptable and used in applicable VEGP procedures and Technical Specifications.
20.5	The units of radioactivity specified in this regulation are accepted and conformed to in applicable VEGP procedures and Technical Specifications.
20.6	This regulation governs the interpretation of regulations by the NRC and does not impose independent obligations on licensees.
20.7	This regulation gives the address of the NRC and does not impose independent obligations on licensees.
20.8	This regulation specifies the information collection requirements of the Paperwork Reduction Act. It does not impose independent obligations on licensees.

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- 20.101 The radiation dose limits specified in this regulation are complied with through the implementation of and adherence to administrative policies and controls and appropriate health physics procedures developed for this purpose. Conformation is documented by the use of appropriate personnel monitoring devices and the maintenance of required records (FSAR chapter 12).
- 20.102 When required by this regulation, the accumulated dose for any individual permitted to exceed the exposure limits specified in 20.101(a) is determined by the use of Form NRC-4 or its equivalent. Appropriated health physics procedures and administrative policies control this process (FSAR chapter 12).
- 20.103(a) Compliance with this regulation is ensured through the implementation of appropriate health physics procedures relating to air sampling for radioactive materials and bioassay of individuals for internal contamination. Administrative policies and controls provide adequate margins of safety for the protection of individuals against intake of radioactive materials. The systems and equipment described in chapters 11 and 12 of the FSAR provide the capability to implement these procedures.
- 20.103(b) Appropriate process and engineering controls and equipment, as described in chapters 11 and 12 of the FSAR, are installed and operated to maintain levels of airborne radioactivity as low as practicable. When necessary, as determined by VEGP administrative guidelines, additional precautionary procedures are utilized to limit the potential for intake of radioactive materials.
- 20.103(c) VEGP implements the requirements of this regulation by ensuring the proper use of approved respiratory protection equipment. VEGP uses the stipulations of Regulatory Guide 8.15, Acceptable Programs for Respiratory Protection (FSAR chapter 12). In addition, an exemption to footnote d-2(c) of Appendix A of 10 CFR Part 20 was granted by the NRC (September 16, 1998) to allow use of MSA GMR-I canisters in lieu of supplied air or self-contained breathing apparatuses.
- 20.103(d) This regulation describes further restrictions which the Commission may impose on licensees. It does not impose any independent obligations on licensees.
- 20.103(e)(f) VEGP maintains an approved respiratory protection program and all its respiratory protection equipment is certified.

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20.103(g)	The notification required by this regulation will be performed at the appropriate time.
20.104	Conformation with this regulation is ensured by appropriate GPC policies regarding employment of individuals under the age of 18 and the VEGP Health Physics Manual restricting these individuals' access to restricted areas.
20.105(a)	Chapters 11 and 12 of the FSAR provide the information and related radiation dose assessments specified by this regulation.
20.105(b)	The radiation dose rate limits specified in this regulation are complied with through the implementation of VEGP procedures, Technical Specifications, and administrative policies which control the use and transfer of radioactive materials. Appropriate surveys and monitoring devices document this compliance.
20.105(c)	This regulation refers to 40 CFR Part 190. It does not impose independent obligations on licensees.
20.106(a)	Conformation with the limits specified in this regulation is ensured through the implementation of VEGP procedures and applicable Technical Specifications which provide adequate sampling and analyses and monitoring of radioactive materials in effluents before and during their release. The level of radioactivity in station effluents is minimized to the extent practicable by the use of appropriate equipment designed for this purpose, as described in chapters 11 and 12 of the FSAR.
20.106(b)	GPC has not and does not currently intend to include in any license or amendment applications proposed limits higher than those specified in 20.106(a), as provided in these regulations.
20.106(c)	
20.106(d)	Appropriate allowances for dilution and dispersion of radioactive effluents are made in conformance with this regulation and are described in detail in chapter 11 of the FSAR and in appropriate reports required by the Technical Specifications.
20.106(e)	This regulation provides criteria by which the Commission may impose further limitations on releases of radioactive material by a licensee. It imposes no independent obligations on licensees.
20.106(f)	This regulation states that the provisions of 20.106 do not apply to disposal of radioactive material into sanitary sewage systems. It imposes no independent obligations on licensees.

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- 20.107 This regulation clarifies that the Part 20 regulations are not intended to apply to the intentional exposure of patients to radiation for the purpose of medical diagnosis or therapy. It does not impose any independent obligations on licensees.
- 20.108 Necessary bioassay equipment and procedures, including whole body counting, are utilized at VEGP to determine exposure of individuals to concentrations of radioactive materials. Appropriate health physics procedures and administrative policies implement this requirement (FSAR chapter 12).
- 20.201 The surveys required by this regulation are performed at adequate frequencies and contain such detail as to be consistent with the radiation hazard being evaluated. When necessary, the radiation special work permit system established at the plant provides for detailed physical surveys of equipment, structures, and work sites to determine appropriate levels of radiation protection. Applicable health physics procedures require these surveys and provide for their documentation in such manner as to ensure compliance with the regulations of 10 CFR 20 (FSAR chapter 12).
- 20.202(a) The VEGP health physics procedures set forth policies and practices which ensure that each individual is supplied with, and is required to use, appropriate personnel monitoring equipment. The radiation work permit system is established to provide additional control of personnel working in radiation areas and to ensure that the level of protection afforded to these individuals is consistent with the radiological hazards in the work place (FSAR chapter 12).
- 20.202(b) The terminology set forth in this regulation is accepted and used in applicable VEGP procedures, Technical Specifications, and those portions of the VEGP health physics program in which it is used.
- 20.202(c) This regulation specifies the manner in which personnel dosimeters are processed and evaluated. Conformance is through the implementation of appropriate VEGP health physics procedures (FSAR chapter 12).
- 20.203(a) Materials used for labeling, posting or otherwise designating radiation hazards or radioactive materials, and using the radiation symbol, conform to the conventional design prescribed in this regulation in accordance with VEGP procedures.

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20.203(b)	This regulation is conformed to through the implementation of appropriate health physics procedures relating to posting of radiation areas, as defined in 10 CFR 20.202(b)(2).
20.203(c)	<p>The requirements of this regulation for high radiation areas are conformed to by the implementation of the VEGP Technical Specifications and appropriate plant health physics procedures. The controls and other protective measures set forth in the regulation are maintained under the surveillance of the VEGP health physics department.</p> <p>It should be noted that technical specifications may provide alternate access control methods to be applied "in lieu of the 'control device' or 'alarm signal' required by paragraph 20.203(c)(2) of 10 CFR 20," which will prevent unauthorized entry into a high radiation area.</p>
20.203(d)	Airborne radioactivity areas, as defined in this regulation, are posted as required by provisions of appropriate health physics procedures. These procedures also provide for the surveillance requirements necessary to determine airborne radioactivity levels.
20.203(e)	The area and room posting requirements set forth in this regulation pertaining to radioactive materials are complied with through the implementation of appropriate health physics procedures.
20.203(f)	The container labeling requirements set forth in this regulation are complied with through the implementation of appropriate health physics procedures.
20.204	The posting requirement exceptions described in this regulation are used where appropriate and necessary at VEGP. Adequate controls are provided within the health physics procedures to ensure safe and proper application of these exceptions.
20.205	The requirements of this regulation pertaining to procedures for picking up, receiving, and opening packages of radioactive materials are implemented by the health physics program and appropriate health physics procedures. These procedures also provide for the necessary documentation to ensure an auditable record of compliance (PSAR chapter 12).

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- 20.206 The requirements of 10 CFR 19.12 referred to by this regulation are satisfied by the radiation worker training conducted at VEGP. Appropriate health physics procedures set forth requirements for radiation workers to receive this instruction on a periodic basis (FSAR chapter 12).
- 20.207 The storage and control requirements for licensed materials in unrestricted areas are conformed to and documented through the implementation of the health physics program (FSAR chapter 12).
- 20.301 The general requirements for waste disposal set forth in this regulation are complied with through the health physics procedures and the provisions of the plant license. Chapter 11 of the FSAR describes the solid waste disposal system installed at VEGP.
- 20.302 No such application for proposed disposal procedures, as described in this regulation, has been made or is currently contemplated at VEGP.
- 20.303 No plans for waste disposal by release into sanitary sewage systems, as provided for in this regulation, are contemplated by VEGP nor is this practice currently utilized.
- 20.305 Specific authorization, as described in this regulation, will be requested by GPC for treatment or disposal of wastes by incineration within the levels specified in sections 20.106(b) and 20.302. The volume reduction system is described in FSAR section 11.4.
- 20.306 This regulation describes the disposal requirements for specific wastes. Conformance to this regulation is through implementation of the systems and processes described in Chapter 11 of the FSAR.
- 20.311 This regulation sets forth the documentation requirements to control radioactive waste intended for disposal at a land disposal facility. Conformance with this regulation is through the implementation of VEGP procedures on offsite shipment of radioactive wastes.
- 20.401 The requirements of these regulations are complied with through the implementation of appropriate technical specifications and health physics procedures pertaining to records of surveys, radiation monitoring, and waste disposal. The retention periods specified for such records are also provided for in these specifications and procedures (FSAR chapter 12).

<u>Regulation (10 CFR)</u>	<u>Application to VEGP</u>
20.402	VEGP has established an appropriate inventory and control program to ensure strict accountability for licensed radioactive materials. Reports of theft or loss of licensed material are required by reference to the regulations of 10 CFR in the Technical Specifications.
20.403	Notifications of incidents as described in this regulation are ensured by the requirements of the Technical Specifications, the VEGP health physics program, and appropriate plant procedures, which also provide for the necessary assessments to determine the occurrence of such incidents.
20.405	Reports of overexposures to radiation and the occurrence of excessive levels and concentrations, as required by this regulation, are provided for by reference in the Technical Specifications and in appropriate health physics procedures.
20.407	The personnel monitoring report required by this regulation is expressly provided for by the Technical Specifications. Appropriate health physics procedures establish the data base from which this report is generated (FSAR chapter 12).
20.408	The report of radiation exposure required by this regulation upon termination of an individual's employment or work assignment is generated through the provisions of the health physics procedure.
20.409	The notification and reporting requirements of this regulation, and those referred to by it, are satisfied by the provisions of the health physics procedure.
20.501	This regulation provides for the granting of exemptions from 10 CFR 20 regulations, provided such exemptions are authorized by law and will not result in undue hazard to life or property. It does not impose independent obligations on licensees.
20.502	This regulation describes the means by which the Commission may impose upon any licensee requirements which are in addition to the regulations of Part 20. It does not impose independent obligations on licensees.
20.601	This regulation describes the remedies which the Commission may obtain in order to enforce its regulations and sets forth those penalties or punishments which may be imposed for violations of its rules. It does not impose any independent obligations on licensees.

## APPLICATION to 10 CFR 50 to VEGP

<u>Regulation</u> <u>(10 CFR)</u>	<u>Application to VEGP</u>
50.1	This regulation states the purpose of the Part 50 regulations and does not impose any independent obligations on licensees.
50.2	This regulation defines various terms and does not impose independent obligations on licensees.
50.3	This regulation governs the interpretation of the regulations by the NRC and does not impose independent obligations on licensees.
50.4	This regulation gives the address, number of copies, and form of communications to the NRC. The VEGP complies with the requirements of this regulation in its correspondence with the NRC. This regulation does not impose independent obligations on licensees.
50.7	This regulation addresses the issue of employee's rights and prohibits discrimination against an employee for engaging in certain protected activities. The regulation also states that the licensee must post form NRC-3, "Notice to Employees," on the premises. The licensee has complied and continues to comply with the requirements of this regulation.
50.8	This regulation specifies the information collection requirements of the Paperwork Reduction Act. It does not impose independent obligations on licensees.
50.9	This regulation requires that information provided to the NRC or required by the NRC to be maintained by the applicant be accurate in all material aspects. Notification of significant implication for public health and safety or common defense and security must be made to the Regional Office within two working days. This requirement is not applicable to information which is provided to the NRC by other reporting or updating requirements. GPC will notify the NRC as required by this regulation should such information be discovered.
50.10 50.11	These regulations specify the types of activities that may not be undertaken without a license from the NRC. GPC does not propose to conduct any such activities at VEGP without an NRC license.
50.12	This regulation provides for the granting of exemptions from 10 CFR 50 regulations, provided such exemptions are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. It does not impose independent obligations on licensees.

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- 50.13 This regulation says that a license applicant need not design against acts of war. It imposes no independent obligations on licensees.
- 50.20 These regulations describe the types of licenses that the  
50.21 NRC issues. They do not address the substantive requirements  
50.22 that an applicant must satisfy to qualify for such licenses.  
50.23
- 50.30 This regulation sets down procedural requirements for the filing of license applications, such as the number of copies of the application that must be provided the NRC. GPC has substantially complied with the procedural requirements in effect at the time when filing its license application and the amendments to it. In particular, 10 CFR 50.30(f) requires that a license application must be accompanied by an Environmental Report required pursuant to 10 CFR 51. GPC submitted an Environmental Report for VEGP Units 1 and 2.
- 50.31 These regulations merely permit more efficient organization  
50.32 of the license application and impose no independent obligations on licensees.
- 50.33 This regulation requires the license application to contain certain general information, such as an identification of the applicant, information about the applicant's financial qualifications, and a list of regulatory agencies with jurisdiction over the applicant's rates and services. This information was provided in the VEGP operating license application. The regulation also requires submittal of radiological emergency response plans of state and local governmental entities that are wholly or partially within the plume exposure pathway Emergency Planning Zone. This material was submitted to the NRC. A scheduler exemption to 10 CFR 50.33(k), decommissioning report as described in 10 CFR 50.75, was requested and is further discussed in the 10 CFR 50.75 portion of this attachment.
- 50.33a This regulation requires applicants for construction permits to submit information required for antitrust review. The antitrust review required by the Atomic Energy Act of 1954, as amended, was performed at the construction permit stage.
- 50.34(a) This regulation governs the contents of the Preliminary Safety Analysis Report and is relevant to the construction permit stage rather than the operating license stage.

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50.34(b)

An FSAR has been prepared and submitted, which addresses in the chapters indicated the information required:

- (1) Site evaluation factors - chapter 2.
- (2) Structures, systems, and components - chapters 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 15.
- (3) Radioactive effluents and radiation protection - chapters 11 and 12.
- (4) Design and performance evaluation - emergency core cooling system (ECCS) performance is discussed and shown to meet the requirements of 10 CFR 50.46 in chapters 6 and 15.
- (5) Results of research programs - chapter 1.
- (6)
  - (i) Organizational structure - chapter 13.
  - (ii) Managerial and administrative controls - chapter 13 and 17. Chapter 17 discusses compliance with the quality assurance requirements of Appendix B.
  - (iii) Plans for preoperational testing and initial operations - chapter 14.
  - (iv) Plans for conduct of normal operations - chapters 13 and 17. Surveillance and periodic testing are specified in the Technical Specifications.
  - (v) Plans for coping with emergencies (Emergency Plan) - chapters 13 and the VEGP Emergency Plan.
  - (vi) Technical Specifications (prepared in conjunction with the staff) - chapter 16 and the VEGP Technical Specifications.
  - (vii) Potential hazards - chapter 3.
- (7) Technical qualifications - chapter 13.
- (8) Operator requalification program - chapter 13.
- (9) Pressurized thermal shock - chapter 5 section 5.3 and responses to Q730.1 and Q251.1.

50.34(c)

A physical Security Plan has been prepared and submitted to the NRC.

<u>Regulation (10 CFR)</u>	<u>Application to VEGP</u>
50.34(d)	A safeguards Contingency Plan has been prepared.
50.34(e)	This regulation requires applicant to protect plans and other related safeguards information against unauthorized disclosure in accordance with the requirements of Section 73.21 as appropriate. It does not impose independent obligations on licensees.
50.34(f)	This regulation addresses additional TMI-related requirements for plants whose construction permit or manufacturing license application was pending February 16, 1982 and does not apply to the VEGP.
50.34(g)	Applicants for construction permits, operating licenses and PSAR or FSAR approval must evaluate their conformance with the Standard Review Plan revision effective six months prior to the application docket date and identify all differences. Where such a difference exists, the evaluation shall discuss how the alternate proposed provides an acceptable method of compliance with the SRP criteria. This information, with appropriate cross references, is discussed in FSAR Section 1.8.
50.34a 50.35	These regulations are relevant to the construction permit stage rather than the operating stage.
50.36	Technical Specifications have been prepared in conjunction with the NRC, including items in each of the categories specified, including: <ol style="list-style-type: none"> <li>(1) safety limits and limiting safety settings,</li> <li>(2) limiting conditions for operation,</li> <li>(3) surveillance requirements,</li> <li>(4) design features,</li> <li>(5) administrative controls,</li> <li>(6) initial notification, and</li> <li>(7) written reports.</li> </ol>
50.36a	The Technical Specifications include specifications which require compliance with 10 CFR 50.34a(c) (releases as low as is reasonably achievable) and ensure that the concentrations of radioactive effluents released to unrestricted areas are within the limits specified in 10 CFR 20.106.

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The reporting requirements of 10 CFR 50.36a(a)(2) are also included in these specifications.

- 50.36b This regulation required the NRC to provide an attachment to the license that identifies the obligations of the licensee in the nonaquatic environmental area. This applicant submitted the proposed environmental protection plan (proposed Appendix B) to the NRC on February 28, 1986. The Environmental Protection Plan was issued for Unit 1 on January 16, 1987 and was submitted unchanged as the proposed Unit 2 Environmental Protection Plan on April 5, 1988.
- 50.37 This regulation requires the applicant to agree to limit access to restricted data. GPC's agreement to do so is in the operating license application.
- 50.38 This regulation prohibits the NRC from issuing a license to foreign-controlled entities. GPC's statement that it is not owned, controlled, or dominated by an alien, foreign corporation, or foreign government is in the operating license application for the VEGP.
- 50.39 This regulation provides that applications and related documents may be made available for public inspection. This imposes no direct obligation on applicants and licensees.
- 50.40 This regulation provides considerations to "guide" the Commission in granting licenses as follows:
- 50.40(a) The design and operation of the facility is to provide reasonable assurance that the applicant will comply with NRC regulations, including those in 10 CFR 20, and that the health and safety of the public will not be endangered. The basis for GPC's assurance that the regulations will be met and the public protected is contained in the PSAR and in the license application and the related correspondence over the years. Moreover, the lengthy process by which the plant is designed, constructed, and reviewed, including reviews by GPC's own staff, the NRC staff, the Advisory Committee on Reactor Safeguards (ACRS), and NRC licensing boards, provides a great deal of assurance that the public health and safety will not be endangered.
- 50.40(b) Another consideration is that the applicant be technically and financially qualified. Both GPC's technical qualifications and its financial qualifications were reviewed by the NRC.

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- 50.40(c) Another consideration is that the issuance of the license is not to be inimical to the common defense and security or to the health and safety of the public. The individual showings of compliance with particular regulations contained in this section, as well as the contents of the entire PSAR and related correspondence over the years, plus the lengthy process of design, construction, and review by GPC, its nuclear steam supply system vendor, and the government, provide GPC considerable assurance that the license will not be inimical to the health and safety of the public. As for the common defense and the security, there is considerable assurance that the license will not be inimical in that GPC has a Security Plan for VEGP, that GPC is not controlled by agents of foreign countries, and that GPC has agreed to limit access to restricted data.
- 50.40(d) The final 50.40 "consideration" is that the applicable requirements of Part 51 have been satisfied. Part 51 concerns compliance with the National Environmental Policy Act of 1969. GPC has submitted an Operating License Stage Environmental Report for both Units 1 and 2. The Final Environmental Statement for both Units was published by the NRC in March 1985.
- 50.41 This regulation applies to Class 104 licenses, such as those for devices used in medical therapy. VEGP has not applied for a Class 104 license, and so 50.41 is not applicable.
- 50.42 Section 50.42 provides additional "considerations" to "guide" the Commission in issuing Class 103 licenses. The two considerations are: (1) that the proposed activities will serve a useful purpose proportionate to the quantities of special nuclear material or source material to be utilized and (2) that due account will be taken of the antitrust advice provided by the Attorney General under subsection 105c of the Atomic Energy Act. The "useful purpose" to be served is the production of electric power. The need for the power was determined by the licensing board at the construction permit stage. Although conditions affecting the need for power are constantly changing, GPC periodically makes load projections, and in GPC's judgment the need for VEGP is still substantial. As for the amount of special nuclear material or source material used, there is no reason to believe that their proportion in relation to the power produced is substantially greater than that of other commercial power reactors in this country. As for the antitrust advice of the Attorney General, as noted above, the antitrust review was completed at the construction permit stage.
- 50.43 This regulation imposes certain duties on the NRC and addresses the applicability of the Federal Power Act and the right of other agencies to obtain NRC licenses. It imposes no additional obligations on licensees.

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- 50.44 The VEGP combustible gas control system is described in FSAR subsection 6.2.5. The system is designed to maintain the hydrogen concentration in containment at a safe level following a loss-of-coolant accident (LOCA), without purging the containment atmosphere, as specified in 10 CFR 50.44(e). The requirements of 10 CFR 50.44 are satisfied as described in subsection 6.2.5.
- 50.45 This regulation provides standards for construction permits rather than operating licenses and is therefore not material to this operating license proceeding.
- 50.46 FSAR section 6.3, subsection 15.6, and paragraph 6.2.1.5 describe the emergency core cooling system and the methods used to analyze ECCS performance following a postulated loss-of-coolant accident. LOCA-ECCS analysis for VEGP uses an NRC-approved evaluation model which is in compliance with Appendix K to 10 CFR 50. The analysis provided results in compliance with the criteria of 10 CFR 50.46(b). The resulting limits are reflected in the Technical Specifications.
- 50.47 This regulation requires the applicant to submit a radiological emergency plan for NRC and FEMA review and approval. GPC has submitted an Emergency Plan for the VEGP.
- 50.48 This regulation requires the applicant to submit a fire protection plan that satisfies the requirements of Appendix R and Criterion 3 of Appendix A. GPC has submitted a Fire Protection Evaluation Report to the VEGP. The fire protection design and evaluation report is presented in FSAR subsection 9.5.1 and Appendices 9A and 9B and conforms to CMEB 9.5-1.
- 50.49 Each holder of or each applicant for a license to operate a nuclear power plant shall establish a program for qualifying electric equipment which is (1) safety-related, (2) nonsafety-related electric equipment whose failure could prevent safe operations, or (3) needed for certain post-accident monitoring operations, as specified in Reg. Guide 1.97. The requirements of this regulation have been addressed in the FSAR Section 3.11.
- 50.50 This regulation provides that the NRC will issue a license upon determining that the application meets the standards and requirements of the Atomic Energy Act and the regulations and that the necessary notifications to other agencies or bodies have been duly made. It imposes no direct obligations on licensees.
- 50.51 This regulation specifies the maximum duration of licenses. Compliance will be effected by the Commission's writing the license so as to comply.

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(10 CFR)

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- 50.52 This regulation provides for the combining in a single license of a number of activities. It imposes no independent obligation on the licensee.
- 50.53 This regulation provides that licenses are not to be issued for activities that are not under or within the jurisdiction of the United States. The operation of VEGP will be within the United States and subject to the jurisdiction of the United States, as is evident from the description of the facility in the operating license application.
- 50.54 This regulation specifies certain conditions that are incorporated in every license issues. Compliance is effected simply by including these conditions in the license when it is issued. This regulation imposes no independent obligations on the licensee.
- 50.55 This regulation addresses conditions of construction permits, not operating licenses, and so it is not relevant at this point.
- 50.55a(a)(1) Various chapters of the FSAR discuss design, fabrication, erection, construction, testing, and inspection of safety-related equipment. For example, chapter 14 provides information on testing of safety-related systems. Chapter 17 provides information concerning the quality assurance program that was utilized. As a further example of a specific system, chapter 5, section 5.2, Integrity of the Reactor Coolant System Boundary, discusses the design of the reactor coolant system.
- 50.55a(a)(2) These paragraphs are general paragraphs leading into paragraphs (b), (c), (d), (e), and (g) of this section and provides for alternative requirements.
- 50.55a(a)(3)
- 50.55a(b)(1) These paragraphs provide guidance concerning the approved Edition and Addenda of Sections III and XI of the ASME B&PV Code.
- 50.55a(b)(2)
- 50.55a(d) These paragraphs provide guidance concerning Quality Group B and C components. The design and fabrication of these components were carried out in accordance with the appropriate ASME Code for plants whose construction permit was issued prior to May 14, 1984. Specific information can be found in chapters 3 and 5 of the FSAR.
- 50.55a(e)
- 50.55a(g) Inservice inspection (ISI) requirements are delineated in this part and are specified in the Technical Specifications, paragraph 4.0.5. The ISI program is discussed in FSAR subsections 3.9.6 and 5.2.4 and in section 6.6.

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(10 CFR)

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- 50.55a(h) As discussed in chapter 7, the protection systems meet IEEE 279-1981.
- 50.56 This regulation provides that the Commission will, in the absence of good cause shown to the contrary, issue an operating license upon completion of the construction of a facility in compliance with the terms and conditions of the construction permit. This imposes no independent obligations on the applicant.
- 50.57(a) This regulation requires the Commission to make certain findings before the issuance of an operating license. Specifically, the findings are:
- (1) Construction of the facility has been substantially completed in conformity with the construction permit and the application as amended. Conformation of the facility to the NRC rules and regulations and the Act, as implemented by the regulations, has been demonstrated by the application.
  - (2) The Technical Specifications and resulting operating procedures provide assurance that the unit will operate in conformity with the application as amended and with the rules and regulations.
  - (3) The application demonstrates that the facility can be operated without endangering the health and safety of the public and in compliance with the regulations, as noted above.
  - (4) The application demonstrates that GPC is technically and financially qualified to operate the unit.
  - (5) The applicable provisions of 10 CFR 140 have been satisfied.
  - (6) The approved Security Plan ensures that special nuclear material is being appropriately safeguarded. The application demonstrates that the operation of the unit will not be inimical to the health and safety of the public.

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- 50.57(b) The license, as issued, will contain appropriate conditions to ensure that items of construction or modification are completed on a schedule acceptable to the Commission.
- 50.57(c) This regulation provides for a low power testing license and does not impose independent obligations on the applicant for full power operation.
- 50.58 This regulation provides for the review and report of the Advisory Committee on Reactor Safeguards. The ACRS has reviewed the operating license application for VEGP in accordance with its usual practice.
- 50.59 This regulation provides for the licensing of certain changes, tests, and experiments at a licensed facility. All modifications to the licensed plant that involve an unreviewed safety question will require prior Commission approval.
- 50.60 All light water nuclear power reactors must meet the fracture toughness and material surveillance program requirements for the reactor coolant pressure boundary set forth in Appendix G and H except when (1) the requirements of 10 CFR 50.12 are met and (2) the proposed alternative would provide an adequate level of quality and safety. Information to demonstrate compliance with this regulation can be found in the FSAR Chapter 5 and the Technical Specifications.
- 50.61 This regulation governs the fracture toughness requirements for protection against pressurized thermal shock events. VEGP meets the screening criteria set forth in this regulation as documented in the VEGP response to Q730.1, Q251.1 and Section 5.3 of the FSAR.
- 50.62 Each pressurized water reactor (PWR) must have equipment from sensor output to final actuation device, that is diverse from the reactor trip system, to automatically initiate the auxiliary (or emergency) feedwater system, and initiate a turbine trip under conditions indicative of an "Anticipated Transient Without Scram" (ATWS). The design of the Vogtle ATWS was approved by the NRC in correspondence dated October 3, 1988. FSAR documentation was provided in Amendment 39 and installation has been completed on both Units 1 and 2.
- 50.63 This regulation requires the licensee to address the issue of station blackout. The required information as defined in this regulation is to be provided to the NRC by 270 days after the date of license issuance. The VEGP will provide the Unit 2 information within the time required. As discussed in the FSAR response to Q730.1 and Appendix C to the Vogtle SEE, NUREG-1137, this issue can be addressed as a post licensing item without undue risk to the health and safety of the public.

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- 50.64 This regulation applies to highly enriched uranium non-power reactors and is not applicable to the VEGP.
- 50.70 When the Commission has assigned resident inspectors to VEGP, GPC has provided office space in accordance with the requirements of this section. GPC permits access to the station to NRC inspectors in accordance with 10 CFR 50.70(b)(3).
- 50.71 Records are and will be maintained in accordance with the requirements of sections (a) through (e) of this regulation and the license. Section (e) requires that the FSAR be updated within 24 months after the issuance of a operating license and annually thereafter. An exemption to 10 CFR 50.71(e)(3)(i) was granted by the NRC, March 21, 1988, which allows the first update to be deferred until one year following issuance of a full power operating license for Unit 2.
- 50.72 Notification of significant events to the NRC will be made in accordance with the requirements in this regulation.
- 50.73 This regulation requires the licensee to submit a Licensee Event Report (LER) within 30 days for any type of event specified in this regulation regardless of the plant power mode or the significance of the structure, system, or component that initiated the event. VEGP shall comply with this regulation.
- 50.74 Notification of change in licensed operator or senior operator will be made in accordance with the requirements of this regulation.
- 50.75 This regulation establishes requirements as to how reasonable assurance will be provided that funds will be available for decommissioning. GPC has requested a schedule/or extension to this regulation by letter dated December 13, 1988. The required information will be provided for both Units 1 and 2 on or before July 26, 1990.
- 50.78 Installation information may be obtained upon Commission request to allow verification by the International Atomic Energy Agency and, if necessary, to implement the US/IAEA Safeguards Agreement.
- 50.80 This regulation provides that licenses may not be transferred without NRC consent. No application for transfer of a license is presently involved in the VEGP proceeding. The formation of a nuclear operating company is contemplated, however, any license transfer will be effected in compliance with this regulation.

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- 50.81 This regulation permits the creation of mortgages, pledges, and liens on licensed facilities, subject to certain provisions. GPC licensed facilities are not mortgaged, pledged, or otherwise encumbered as those terms are used in this regulation.
- 50.82 This regulation provides for the termination of licenses. It does not apply to VEGP because GPC has not requested the termination of a license.
- 50.90 This regulation governs applications for amendments to licenses. Future requests for license amendments will be made in accordance with these requirements.
- 50.91 This regulation provides guidance to the NRC in issuing license amendments.
- 50.92 This regulation addresses amendments to construction permits and operating licenses and does not impose independent obligations on the licensees at the operating license application stage.
- 50.100 These regulations govern the revocation, suspension, and  
50.101 modification of licenses by the Commission under unusual  
50.102 circumstances. No such circumstances are present in the  
50.103 VEGP proceeding, and these regulations are not applicable.
- 50.109 This regulation specifies the conditions under which the NRC may require the backfitting of a facility. This regulation imposes no independent obligations on a licensee unless the NRC proposes a backfitting requirement.
- 50.110 This regulation governs enforcement of the Atomic Energy Act, the Energy Reorganization Act of 1974, and the NRC's regulations and orders. No enforcement action is at issue in the VEGP proceeding, and so this regulation is not applicable.
- Appendix A Appendix A provides general design criteria for nuclear power plants. The application of each criterion to VEGP is discussed in FSAR section 3.1.
- Appendix B Chapter 17 of the FSAR describes in detail the provisions of the quality assurance program which has been implemented to meet applicable requirements of Appendix B.
- Appendix C This appendix provides a guide for establishing the applicant's financial qualification. GPC's financial qualifications were fully litigated before the ASLB during the construction permit stage and satisfied the burden of providing that it has reasonable assurance of having the funds it needs to operate the facility.
- Appendix E This appendix specifies requirements for Emergency Plans. An Emergency Plan has been prepared for VEGP which meets these requirements.

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- Appendix G Fracture toughness requirements of this appendix and program requirements given in Appendix H form the basis for Technical Specification surveillance requirements dealing with the use of surveillance specimens. Additional information to demonstrate compliance can be found in FSAR chapter 5. Heatup and cooldown limits consistent with the requirements of this appendix are established in the Technical Specifications.
- Appendix H Reactor vessel material surveillance program requirements are delineated in this part. Technical Specifications and operating procedures are established to implement these requirements. Further information is provided in FSAR chapter 5.
- Appendix I This appendix provides numerical guides for design objectives and limiting conditions for operation to meet the criteria ALARA for radioactive material in light-water-cooled nuclear power reactor effluents. Information necessary to demonstrate compliance with Appendix I is provided in FSAR chapters 11 and 12, and the Technical Specifications.
- Appendix J Reactor containment leakage testing for water-cooled power reactors is delineated in this appendix. These requirements are given in the Technical Specifications. Additional information concerning compliance can be found in FSAR chapters 3, 6 and 14. Containment airlocks have been exempted from specific seal leakage test requirements of this appendix, as described in the Technical Specifications.
- Appendix K This appendix specifies features of acceptable ECCS evaluation models. As noted above for 50.46, the analysis of VEGP has been conducted using a model which has been accepted by the Commission staff as meeting the requirements of this appendix.
- Appendix L This appendix covers information requested by the Attorney General for antitrust review of license applications. The antitrust review for VEGP took place at the construction permit stage.
- Appendix M This appendix covers standardization of design and is not applicable to VEGP.
- Appendix N This appendix covers standardization of nuclear power plant designs and is not applicable to VEGP.
- Appendix O This appendix covers standardization of design and is not applicable to VEGP.
- Appendix Q This appendix governs preapplication early review of site suitability issues and is not applicable to the operating license stage of the VEGP.

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## Appendix R

GPC has filed a separate evaluation of the fire protection provisions for VEGP which describes how the fire protection requirements are met. This information is contained in FSAR subsection 9.5.1 and Appendices 9A and 9B and is in conformance with CMEB 9.5.1.

- 51.1 This regulation states the scope of the Part 51 regulations and does not impose any specific obligations on licensees.
- 51.2 This regulation states the purpose of the regulations contained in Subpart A to Part 51 and does not impose any specific obligations on the licensee.
- 51.3 This regulation explains the resolution of conflict between a rule in Subpart A and other subparts or parts of this chapter. No obligations are imposed on the licensee.
- 51.4 This section contains definitions of terms used in Part 51. No obligations are imposed on the licensee. All definitions contained in this section are followed in all appropriate documents.
- 51.5 This regulation governs the interpretation of regulations by the NRC and does not impose any obligations on the licensee.
- 51.6 This section provides for exemptions from Part 51 regulations and does not impose any obligations on the licensee.

Subpart A

- 50.10 This section describes the NRC's obligations towards environmental concerns and the National Environmental Policy Act (NEPA). No obligations are imposed on the licensee.
- 51.12 This section governs the application of Subpart A to ongoing environmental work. No obligations are imposed on the licensee.
- 51.13 This regulation governs the actions to be taken in emergency circumstances by the Commission and does not impose any obligations on the licensee.
- 51.17 This section deals with the NRC submittal of the information collection requirements contained in Part 51 to the Office of Management and Budget. No obligations are imposed on the licensee.
- 51.20 This section lists the types of actions requiring an environmental impact statement (EIS) or a supplement to an EIS. No obligations are imposed on the licensee.

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- 51.21 This regulation deals with the criteria for and identification of licensing and regulatory actions requiring environmental assessments by the NRC and does not impose obligations on this licensee.
- 51.22 This regulation identifies the licensing and regulatory actions eligible for categorical exclusion. No obligations are imposed on the licensee.
- 51.23 This regulation deals with the treatment of environmental impacts of the temporary storage of spent fuel. This regulation does not alter the requirements to consider environmental impacts of spent fuel storage during the term of a reactor operating license or a license for an independent spent fuel storage installation (ISFSI) in a licensing proceeding .
- 51.25 This regulation deals with the NRC's determination to prepare an environmental impact statement or an environmental assessment and the eligibility for categorical exclusions. There are no obligations on the licensee.
- 51.26 This regulation deals with the NRC's obligation to publish a notice of intent and the conduction of the scoping process regarding the environmental impact statement. There are no obligations on the licensee.
- 51.27 This section describes the notice of intent and does not impose any obligations on the licensee.
- 51.28 This section governs the participants in the scoping process and is not an obligation of the licensee.
- 51.29 This regulation describes the scoping process for the EIS and it is not an obligation on the licensee.
- 51.30 This regulation gives a description of an environmental assessment and is not an obligation on the licensee.
- 51.31 This section deals with determinations of the NRC based on the environmental assessment and does not impose obligations on the licensee.
- 51.32 This regulation governs the finding of no significant impact by the NRC and is not an obligation on the licensee.
- 51.33 This regulation governs the issuance of a draft finding of no significant impact in the Federal Register and is not an obligation on the licensee.

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- 51.34 This section deals with the NRC's preparation of a finding of no significant impact and is not an obligation on the licensee.
- 51.35 This section deals with the NRC's publication of a finding of no significant impact in the Federal Register and is not an obligation on the licensee.
- 51.40 This section deals with consultation with NRC Staff and is not an obligation on the licensee.
- 51.41 This regulation deals with the possibility that the Commission may require the submittal of environmental information in complying with Section 102 of the National Environmental Policy Act. The NRC has asked for and received such environmental report and amendments and other correspondences from the applicants for a permit, license, etc.
- 51.45 This section deals with the requirement to submit a document entitled "Applicants Environmental Report" as required by Sections 51.50, 51.53, 51.54, 51.60, 51.61, 51.62 or 51.68 as appropriate. Such a report and amendments were submitted.
- 51.50 This regulation deals with the requirements to submit copies of a document entitled "Applicant's Environmental Report - Construction Permit Stage." Such a document was submitted to the NRC by the licensee in August 1972.
- 51.51 This regulation states that every environmental report - construction permit stage submitted after September 1, 1979, must use Table S-3, Table of Uranium Fuel Cycle Environmental Data in 10 CFR Part 51.51(b) as the basis for analysis of the effects of uranium mining and milling. The licensee submitted their construction stage environmental report in August 1972.
- 51.52 This regulation states that the environmental report for construction permit stage for LWRs submitted after February 4, 1975, must contain an analysis of the environmental effects of transportation of fuel and waste. The licensees ER - construction permit stage was submitted in August 1972.
- 51.53 This section deals with the requirement of a licensee to submit a separate document entitled "Supplement to Applicant's Environmental Report - Operating License Stage" as an update to the construction stage ER. Such a report was submitted by the licensee on August 31, 1983, and was accepted by the NRC on November 30, 1983.
- 51.54 This section deals with the requirement for a manufacturer of a nuclear reactor to submit an environmental report for the manufacturing license. This does not impose any obligations on the licensee.

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- 51.55 This regulation governs the number of copies of the ER to be given to the NRC and the number of copies to be retained by the applicant for distribution to parties and boards in the NRC proceeding. Forty-one copies of the ER-operating permit stage were sent to the Director of Nuclear Reactor Regulation and 109 copies were retained by the licensee as required by the regulation. This was done on November 11, 1983, and is so documented in a letter sent to the NRC by the licensee on November 11, 1983.
- 51.60 This regulation deals with the production of an environmental report-materials license and is not an obligation on the licensee.
- 51.61 This regulation deals with the Environmental report-independent fuel storage (ISFSI) license and is not an obligation on the licensee.
- 51.62 This section deals with the requirement for an applicant for issuance for land disposal of radioactive waste pursuant to Part 61 of this chapter to submit an environmental report. This section does not impose any obligations on the licensee.
- 51.66 This regulation deals with the number of copies of the ER to be submitted and does not impose any obligations on the licensee.
- 51.68 This section contains the requirements for petitioners for rulemaking to produce an environmental report entitled "Petitioners Environmental Report" containing information specified in Section 51.45. This regulation does not impose any obligations on the licensee.
- 51.69 This section deals with the number of copies of the environmental report to be submitted and does not impose any obligations on the licensee.
- 51.70 This section contains the requirements for the NRC to produce draft environmental impact statements. There is no obligation on the licensee.
- 51.71 This section describes the contents of the draft environmental impact statement and does not impose any obligations on the licensee.
- 51.72 This regulation describes the conditions for NRC to prepare a supplement to the draft environmental impact statement. There is no obligation for the licensee.
- 51.73 This section deals with the request for comments on draft environmental impact statements and is an obligation on the NRC and not the licensee.

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- 51.74 This section deals with the distribution of the draft environmental impact statements and is not an obligation on the licensee.
- 51.75 This regulation deals with the obligations on the NRC to issue a draft environmental impact statement relating to the issuance of a construction permit for a production or utilization facility. No obligation is imposed on the licensee.
- 51.76 This section deals with the issuance of a draft environmental impact statement relating to issuance of a license to manufacture a nuclear power reactor. No obligation is imposed on the licensee.
- 51.77 This regulation deals with the distribution of the draft environmental impact statement and is not an obligation on the licensee.
- 51.80 This regulation deals with the obligation on the NRC to prepare a draft environmental impact statement-materials license and is not an obligation on the licensee.
- 51.81 This section deals with the distribution of the draft environmental impact statement and is not an obligation on the licensee.
- 51.85 This section deals with the draft environmental impact statements connected with rulemaking and is not an obligation on the licensee.
- 51.86 This section deals with the distribution of the draft environmental impact statement and is not an obligation on the licensee.
- 51.88 This regulation governs the policy of the NRC to follow 40 CFR 1506.8 regarding the NEPA process for proposals for legislation and is not an obligation on the licensee.
- 51.90 This section states the obligation on the NRC to produce a final environmental impact statement and is not an obligation on the licensee.
- 51.91 This section describes the contents of the final environmental impact statement and is not an obligation on the licensee.
- 51.92 This regulation governs the conditions for the NRC to prepare a supplement to the final environmental impact statement and is not an obligation on the licensee.

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- 51.93 This section governs the distribution of the final environmental impact statement and is not an obligation on the licensee.
- 51.94 This regulation states that obligation of the NRC to consider the final environmental impact statement in the decision making process and is not an obligation on the licensee.
- 51.95 This regulation deals with the preparation of a supplement to the final environmental impact statement by the NRC and is not an obligation on the licensee.
- 51.97 This section deals with the preparation of a final environmental impact statement-materials license and is not an obligation on the licensee.
- 51.100 This regulation deals with the timing of the NRC's actions and is not an obligation on the licensee.
- 51.101 This regulation defines the limitations on NRC actions and is not an obligation on the licensee.
- 51.102 This regulation governs the NRC's obligations to provide a  
51.103 record of decision and is not an obligation on the licensee.
- 51.104 This section deals with the NRC's proceedings using public hearings in connection with the environmental impact statement and it not an obligation on the licensee.
- 51.105 This regulation describes the requirements to conduct public hearings for issuance of construction permits or licenses to manufacture and is not an obligation on the licensee.
- 51.106 This regulation describes the requirements to conduct public hearings for issuance of an operating license and is not an obligation on the licensee.
- 51.116 This regulation relates to the publication of a notice of intent in the Federal Register regarding the environmental impact statement and is not an obligation on the licensee.
- 51.117 This regulation relates to the publication of a notice of availability of a draft environmental impact statement in the Federal Register and is not an obligation on the licensee.
- 51.118 This regulation relates to the publication of a notice of availability of a final environmental impact statement and is not an obligation on the licensee.
- 51.119 This regulation relates to the publication of a finding of no significant impact and is not an obligation on the licensee.

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- 51.120 This section governs the availability of environmental documents for public inspection by the NRC and is not an obligation on the licensee.
- 51.121 This section deals with the status of NEPA actions and is not an obligation of the licensee.
- 51.122 This section deals with the list of interested organizations and groups to be maintained by the NRC and is not an obligation on the licensee.
- 51.123 This section details the charges for environmental documents; distribution to public and distribution to government agencies and is not an obligation on the licensee.
- 51.124 This section deals with the NRC comments on the draft environmental impact statement and is not an obligation on the licensee.
- 51.125 This section describes the official response for review of the NRC's NEPA compliance and is not an obligation on the licensee.
- Appendix A Appendix A to 10 CFR Part 51, Subpart A describes the format for presentation of material in environmental impact statements. It does not impose independent obligations on the licensee.

# Application of 10 CFR 100 to VEGP

- 100.1            This regulation is explanatory and does not impose independent obligations on licensees.
- 100.2            This regulation is explanatory. VEGP is not novel in design and is not unproven as a prototype or pilot plant.
- 100.3            This regulation is explanatory and does not impose independent obligations on licensees.
- 100.8            This regulation specifies the information collection requirements of the Paperwork Reduction Act. It does not impose independent obligations on licensees.
- 100.10           The factors listed related to both the unit design and the site have been provided in the application. Site specifics, including seismology, meteorology, geology, and hydrology, are presented in chapter 2 of the FSAR. The exclusion area, low population zone, and population center distance are provided and described. The FSAR also describes the characteristics of reactor design and operation.
- 100.11           An exclusion area has been established, as described in FSAR section 2.1. The low population zone required by 100.11(a)(2) has been established, as described in FSAR section 2.1. The nearest population center is also discussed in chapter 2.  
  
The FSAR accident analyses, particularly those in chapter 15, demonstrate that offsite doses resulting from postulated accidents would not exceed the criteria in this section of the regulation.
- Appendix A       Appendix A to 10 CFR 100 provides seismic and geologic siting criteria for nuclear power plants. The compliance of the VEGP site with this appendix is discussed in the VEGP Safety Evaluation Report, NUREG-1137.