

Prepared for

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ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

Internal Committee Use
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February 18, 1981
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Mr. E. Igne
ACRS
Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Al:

In a letter dated December 1st, 1980 ^{to} ~~from~~ W. E. Ehrensperger concerning the licensing of the A. W. Vogtle Nuclear Plant, Mr. Eisenhower comments "The staff believes that the deletion of the enclosure building appears to represent a significant change in safety margin to the design for which we issued construction permits." Would you please ask the staff what it considers to be the increase in risk, in quantitative terms?

Further in the letter Mr. Eisenhower asks that the request for change in construction permit "should include a cost-benefit analysis that demonstrates that the reduced safety margin would be warranted by the savings in cost associated with deleting the containment enclosure buildings".

Would you please ask the staff:

- (1) The regulatory basis for this request.
- (2) Where one finds described the sort of analysis that would be acceptable.

Sincerely,

W. Kerr
William Kerr

WK/gh

*Vogtle
x-Kerr*

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ENCLOSURE 2

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

DEC 01 1980

Docket Nos. 50-424
and 50-425

Mr. W. E. Ehrensperger
Senior Vice President
Power Supply
Georgia Power Company
P. O. Box 4545
Atlanta, Georgia 30302

Dear Mr. Ehrensperger:

SUBJECT: DELETION OF THE CONTAINMENT ENCLOSURE BUILDING ON THE A. W. VOGTLE
NUCLEAR PLANT

In a letter dated August 21, 1979, Georgia Power Company filed Supplement 6 to its application for Construction Permit and Operating License for the A. W. Vogtle plant. This supplement described a modification to the plant design deleting the containment enclosure building and its safety grade exhaust and recirculation system. The modification replaced the enclosure building with an equipment building extending upward from grade to about one third of the containment building height. The equipment building is not designed to perform a safety function. This supplement also included revised analyses for the radiological consequences of a Loss-of-Coolant Accident, with the calculations not taking credit for the enclosure building. The proposed deletion of the enclosure building and its safety function was previously discussed in a meeting with the NRC staff on August 8, 1979. In that meeting, you requested an expeditious review and prompt decision on the design change.

In a letter dated April 28, 1980, Georgia Power Company advised that the need for a prompt decision on this design change had abated and may be delayed until January 31, 1981; and that the design was proceeding based upon deletion of the enclosure building.

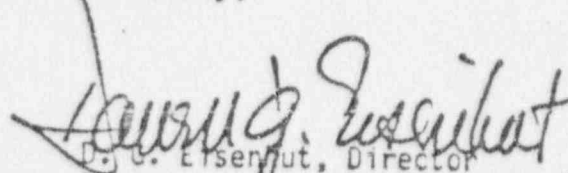
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The staff believes that the deletion of the enclosure building appears to represent a significant change in safety margin to the design for which we issued the construction permits. The change would impact and invalidate the evaluations presented in the Safety Evaluation Report issued March 8, 1974. Therefore, we conclude that the proposed change must be considered under an amendment to the construction permits. If you wish to pursue this matter, please provide a Request for Amendment of Construction Permits. Such a request for amendment should include a cost-benefit analysis that demonstrates that the reduced safety margin would be warranted by the savings in cost associated with deleting the containment enclosure building. Conversely, you may provide us with your basis for concluding that the proposed modification to the enclosure building should not be considered a change in "the proposed design of the facility as described in your application including, but not limited to the principal architectural and engineering criteria for the design" or in "the major features or components incorporated therein for the protection of the health and safety of the public."

Sincerely,



D. C. Eisenhut, Director
Division of Licensing