

May 15, 2020

Docket Nos.: 52-025  
52-026

ND-20-0164

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

Vogtle Electric Generating Plant Units 3 and 4  
Updated Overall Integrated Plan in Response to March 12, 2012 Commission Order  
Modifying Licenses with Regard to Requirements for Mitigation Strategies for  
Beyond-Design-Basis External Events (Order Number EA-12-049)

References:

1. NRC Order Number EA-12-049, *Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events*, dated March 12, 2012
2. SNC Letter ND-13-1702, *Vogtle Electric Generating Plant Units 3 and 4 Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)*, dated August 22, 2013
3. SNC Letter ND-20-0165, *Vogtle Electric Generating Plant – Units 3 and 4 Thirteenth Six-Month Status Report of the Implementation of the Requirements of the Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049)*, dated February 28, 2020
4. Summary of a Public Meeting with Southern Nuclear Operating Company on June 13, 2019 [ML19171A022]

Ladies and Gentlemen:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Order EA-12-049 (Reference 1) to Southern Nuclear Operating Company directing the Vogtle Electric Generating Plant (VEGP) Units 3 and 4 to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. VEGP Unit 3 and 4's Diverse and Flexible Mitigation Capability (FLEX) Overall Integrated Plan (OIP) was submitted to the NRC on August 22, 2013 (Reference 2). SNC submitted the latest required subsequent six-month update February 28, 2020 (Reference 3).

During a Category I public meeting on June 13, 2019 (Reference 4) SNC and the NRC staff discussed SNC's proposed plan for implementation of the Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events and the associated rulemaking for 10 CFR 50.155 at VEGP Units 3 and 4. SNC took an action at this public meeting to consider submitting an OIP update, in a format more similar to a final integrated plan, providing

aspects that are important to document considering the unique features of the AP1000 design. This updated OIP is provided in response to the June 13, 2019 public meeting discussion. No NRC action is requested in response to this submittal.

Enclosure 1 provides the proprietary updated/plant-specific information for the VEGP Units 3 and 4 FLEX OIP. **(Withheld Information)**. The enclosure contains information proprietary to Westinghouse Electric Company LLC ("Westinghouse"), supported by an Affidavit signed by Westinghouse, the owner of the information. The Affidavit sets forth the basis on which the information may be withheld from public disclosure by the Nuclear Regulatory Commission ("Commission") and addresses with specificity the considerations listed in paragraph (b)(4) of Section 2.390 of the Commission's regulations. Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations. Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse Affidavit should reference CAW-20-5030 and should be addressed to Camille T. Zozula, Manager, Infrastructure & Facilities Licensing, Westinghouse Electric Company, 1000 Westinghouse Drive, Suite 165, Cranberry Township, Pennsylvania 16066.

Enclosure 2 provides the non-proprietary updated/plant-specific information for the VEGP Units 3 and 4 FLEX OIP.

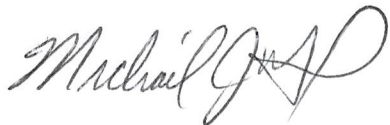
Enclosure 3 provides the Westinghouse Proprietary Information Notice, Copyright Notice and CAW-20-5030, supporting the proprietary nature of information provided in Enclosure 1.

**Enclosure 1 contains information that is considered proprietary and security related; therefore, Enclosure 1 is requested to be withheld from disclosure to the public under 10 CFR 2.390.**

This letter contains no regulatory commitments.

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

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael J. Yox". The signature is stylized with a large, looped "M" and a cursive "Yox".

Michael J. Yox  
Vogtle Units 3 and 4 Regulatory Affairs Director  
Southern Nuclear Operating Company

MJY/KMS/sfr

- Enclosures: 1) Vogtle Electric Generating Plant Units 3 and 4 – Updated Flex Plan Nuclear Regulatory Commission Order EA-12-049 Strategies for Beyond Design Basis External Events (SVP\_SV0\_005765) (Proprietary) **(Withheld Information in accordance with 10 CFR 2.390)**
- 2) Vogtle Electric Generating Plant Units 3 and 4 – Updated Flex Plan Nuclear Regulatory Commission Order EA-12-049 Strategies for Beyond Design Basis External Events (Non-Proprietary)
- 3) Vogtle Electric Generating Plant Units 3 and 4 - CAW-20-5030, Westinghouse Review of Vogtle 3&4 Flex Plan

Cc:

**Southern Nuclear Operating Company/ Georgia Power Company**

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Mr. D. L. McKinney (w/o enclosures)

Mr. M. D. Meier (w/o enclosures)

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