



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 19, 2021

Ms. Cheryl A. Gayheart
Regulatory Affairs Director
Southern Nuclear Operating Co., Inc.
3535 Colonnade Parkway
Birmingham, AL 35243

SUBJECT: VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2 –
SUPPLEMENTAL INFORMATION NEEDED FOR ACCEPTANCE OF
REQUESTED LICENSING ACTION RE: LICENSE AMENDMENT REQUEST
TO REVISE TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENT
3.3.5.2 ALLOWABLE VALUES (EPID NO. L-2021-LLA-0054)

Dear Ms. Gayheart:

By letter dated March 30, 2021 (Agencywide Documents and Access Management System Accession No. ML21089A388), Southern Nuclear Operating Company, Inc. (SNC, the licensee) submitted a license amendment request (LAR) for the Vogtle Electric Generating Plant, Units 1 and 2 (Vogtle). The proposed LAR would revise Technical Specification (TS) 3.3.5, "Loss of Power (LOP) Instrumentation," Surveillance Requirement (SR) 3.3.5.2 Allowable Values. The proposed amendment would modify the allowable value (AV) for the loss of voltage (LOV) and degraded voltage (DV) relays.

Specifically, SNC proposes to change the CHANNEL CALIBRATION with setpoint Allowable Value for SR 3.3.5.2 A and B as below:

	Existing AV	Proposed AV
SR 3.3.5.2.A (Loss of Voltage)	≥ 2912 Volts (V)	$\geq \mathbf{2958.2}$ V
SR 3.3.5.2.B (Degraded Voltage)	≥ 3683 V	$\geq \mathbf{3729.2}$ V

The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this LAR. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an application for an amendment to a license (including the technical specifications) or construction permit must fully describe the changes requested, and follow the form prescribed for original applications as applicable. Section 50.34 of 10 CFR addresses the content of technical

information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has completed the acceptance review of the LAR in accordance with Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-109, Revision 2, "Acceptance Review Procedures," dated January 16, 2017 (ADAMS Accession No. ML16144A521), and determined that additional information is needed for the NRC to begin its detailed technical review. Specifically, the proposed LAR does not contain sufficient information for the NRC staff to verify that the proposed LOV and DV relay AVs and their associated time delays are adequate to assure that required protective actions will be initiated before the associated plant process parameter exceeds its analytical limit.

As such, the NRC staff does not have the sufficient technical information to complete its detailed review and make an independent assessment regarding the acceptability of the proposed LAR in terms of regulatory requirements for the protection of public health and safety and the environment. The information needed by the NRC staff was conveyed to SNC via email dated April 8, 2021, during a call on April 19, 2021, and is being followed by this letter.

The NRC staff identified that the following information is needed, within 13 working days from the date of this letter, to begin its detailed technical review:

- The as-found tolerance (AFT) and as-left tolerance (ALT) values of the nominal trip setpoint (NTS) calibrations.
- The potential transformer ratio (for voltage conversion from the transformer's primary winding to secondary winding).
- Verification of (a) the current Analytical Limits (ALs) of the 4.16 kV Engineered Safety Features (ESF) Bus LOP Instrumentation are 2912 V (Loss of Voltage) and 3683 V (Degraded Voltage), and (b) these ALs are not changed in the calculation.

The NRC staff identified the following information as a request of additional information (RAI) which should be provided with the supplemental information requested for acceptance. If this information cannot be provided, please provide a date when it will be available:

- The full model numbers and the vendor (ABB) datasheets of the affected relays, including the relays' applicable pickup and dropout voltages and performance tolerances. Also, discuss whether a harmonic filter will be used, which could affect the repeatability versus temperature range uncertainty.
- The full model numbers and the vendor datasheets of the voltage-to-current module and the analog-to-digital module, including the uncertainty values of these devices.

The NRC staff needs the above information to begin its detailed technical review and perform an independent verification of the allowable values for the LOV and DV relays' trip setpoints.

In order to make the application complete, the NRC staff requests that SNC supplement the application to address the information requested above within working 13 days of the date of this letter.

If the information responsive to the NRC staff's request is not received within 13 working days of the date of this letter, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its activities associated with the application under EPID No. L-2021-LLA-0054. If the application is subsequently accepted for review, you will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

If you have any questions, please contact me at (301) 415-3100 or via email at John.Lamb@nrc.gov.

Sincerely,

/RA/

John G. Lamb, Sr. Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-424 and 50-425

cc: Listserv

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3.3.5.2 ALLOWABLE VALUES (EPID NO. L-2021-LLA-0054) DATED APRIL 19,
2021

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