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ND-22-0419
10 CFR 50.59
10 CFR 52 App. D

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

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4
Report of 10 CFR 50.59 Changes, Tests, and Experiments and
10 CFR 52 Appendix D Departure Report

Ladies and Gentlemen:

This submission is made with regard to the Vogtle Electric Generating Plant (VEGP) Units 3 and 4, Combined License (COL) numbers NPF-91 and NPF-92, respectively, in accordance with the reporting requirements of 10 CFR 50.59(d)(2) and 10 CFR 52, Appendix D, paragraphs X.B.1 and X.B.3.b.

Enclosure 1 provides the report containing a brief description of any changes, tests, and experiments, including a summary of the evaluation of each, as required by 10 CFR 50.59(d)(2), for the period of November 12, 2021 through May 11, 2022.

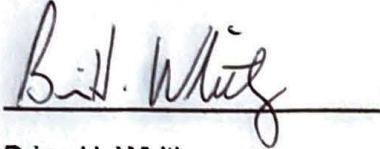
Enclosure 2 provides the report containing a brief description of any plant-specific departures, including a summary of the evaluation of each, as required by 10 CFR 52, Appendix D, paragraphs X.B.1 and X.B.3.b, for the period of November 12, 2021 through May 11, 2022.

For the period of November 12, 2021 through May 11, 2022, there were no changes made to Tier 2* information pursuant to the exemption in License Condition 2.D.(13)(a).

This letter makes no regulatory commitments. This letter has been reviewed and determined not to contain security-related information.

If you have questions, please contact Ms. Amy Chamberlain at 205-992-6361.

Respectfully submitted,

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

Brian H. Whitley
Regulatory Affairs Director
Southern Nuclear Operating Company

- Enclosures:
- 1) VEGP Units 3 and 4, 10 CFR 50.59 Report of Changes, Tests, or Experiments for the Period of November 12, 2021 through May 11, 2022
 - 2) VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of November 12, 2021 through May 11, 2022

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Southern Nuclear Operating Company

ND-22-0419

Enclosure 1

VEGP Units 3 and 4

**10 CFR 50.59 Report of Changes, Tests, or Experiments
for the Period of November 12, 2021 through May 11, 2022**

(This Enclosure consists of 2 pages, including this cover page)

ND-22-0419

Enclosure 1

VEGP Units 3 and 4, 10 CFR 50.59 Report of Changes, Tests, or Experiments for the Period of November 12, 2021 through May 11, 2022

Change Number: LDCR-2022-005

Title: Fire Protection - Miscellaneous

Brief Description of the Changes, Tests and Experiments:

The fire protection program control of transient combustibles was revised to allow a fire watch to be established for unattended combustible packing material in addition to attending the material or storing it in approved containers.

Summary of the Evaluation:

This change did not result in more than a minimal increase in the frequency of occurrence of an accident, likelihood of the occurrence of a malfunction of a structure, system or component (SSC) important to safety, consequences of an accident or malfunction; create the possibility of an accident of a different type or malfunction with a different result; result in a design basis limit for a fission product barrier being exceeded or altered; or result in a departure from a method of evaluation.

The 10 CFR 50.59 evaluation determined that NRC approval was not required prior to implementing this change.

Southern Nuclear Operating Company

ND-22-0419

Enclosure 2

VEGP Units 3 and 4

**10 CFR 52, Appendix D Departure Report
for the Period of November 12, 2021 through May 11, 2022**

(This Enclosure consists of 16 pages, including this cover page)

ND-22-0419

Enclosure 2

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of
November 12, 2021 through May 11, 2022

Departure Number: LDCR-2020-044

License Amendment: Yes ☐ No ☒

Exemption: Yes ☐ No ☒

Unit 3 Amendment No.: N/A

Unit 4 Amendment No.: N/A

Departure Title: UFSAR Chapter 19 Revision: Site-Specific PRA Update

Brief Description of the Plant-Specific Departure:

This departure revised the description of the Probabilistic Risk Assessment (PRA) to reflect the updated and upgraded site-specific PRA.

This departure resulted in changes to the UFSAR (plant-specific DCD) and the Technical Specifications Bases.

Summary of the Evaluation:

This plant-specific departure and the Technical Specification Bases change activity do not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, has no impact on plant operating procedures or a method of control that adversely affects a design function, does not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, does not represent tests or experiments outside the reference bounds of the design basis, and does not alter the assumptions or results of the ex-vessel severe accident assessment.

This departure and activity do not involve a change to Tier 1 information, Tier 2* information, or the Technical Specifications. A 10 CFR 52 Appendix D, Section VIII screening/simplified evaluation determined that NRC approval was not required prior to implementing these changes.

ND-22-0419

Enclosure 2

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of
November 12, 2021 through May 11, 2022

Departure Number: LDCR-2021-038

License Amendment:

Yes ☐ No ☒

Exemption:

Yes ☐ No ☒

Unit 3 Amendment No.:

N/A

Unit 4 Amendment No.:

N/A

Departure Title: RTD Calibration Testing Description

Brief Description of the Plant-Specific Departure:

This departure clarified that cross-calibration testing of the resistance temperature detectors (RTDs) against the in-core thermocouples to verify the RTD calibration coefficients is performed by collecting temperature data from the protection and safety monitoring system, rather than measuring the resistance of each RTD.

This departure resulted in changes to the UFSAR (plant-specific DCD).

Summary of the Evaluation:

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

This departure did not involve a change to Tier 1 information, Tier 2* information, or the Technical Specifications. A 10 CFR 52 Appendix D, Section VIII screening/simplified evaluation determined that NRC approval was not required prior to implementing this departure.

ND-22-0419

Enclosure 2

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of November 12, 2021 through May 11, 2022

Departure Number: LDCR-2021-041

License Amendment:

Yes ☐ No ☒

Exemption:

Yes ☐ No ☒

Unit 3 Amendment No.:

N/A

Unit 4 Amendment No.:

N/A

Departure Title: RCS Setpoint Values Consistency

Brief Description of the Plant-Specific Departure:

This departure revised the specified reactor coolant system (RCS) pressure setpoints for the low-pressure safeguards actuation, low-pressure alarm, high-pressure alarm, and high-pressure reactor trip. This departure also changed the approximate pressurizer pressure at which pressurizer spray is initiated and the approximate pressurizer pressure that is reached during the boron concentration equalization transient.

This departure resulted in changes to the UFSAR (plant-specific DCD).

Summary of the Evaluation:

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

This departure did not involve a change to Tier 1 information, Tier 2* information, or the Technical Specifications. A 10 CFR 52 Appendix D, Section VIII screening/simplified evaluation determined that NRC approval was not required prior to implementing this departure.

ND-22-0419

Enclosure 2

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of
November 12, 2021 through May 11, 2022

Departure Number: LDCR-2021-042

License Amendment: Yes ☐ No ☒

Exemption: Yes ☐ No ☒

Unit 3 Amendment No.: N/A

Unit 4 Amendment No.: N/A

Departure Title: Relocation of DAS Setpoints from TRM to Setpoint Program

Brief Description of the Plant-Specific Departure:

This departure removed the Diverse Actuation System automatic actuation setpoints from the Technical Requirements Manual (TRM) as the TRM setpoints are duplicates of the required setpoint values maintained in the setpoint program results report. A reference to the setpoint program results report was added to the TRM Bases.

This departure resulted in changes to Tier 2 portions of the TRM.

Summary of the Evaluation:

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

This departure did not involve a change to Tier 1 information, Tier 2* information, or the Technical Specifications. A 10 CFR 52 Appendix D, Section VIII screening/simplified evaluation determined that NRC approval was not required prior to implementing this departure.

ND-22-0419

Enclosure 2

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of
November 12, 2021 through May 11, 2022

Departure Number: LDCR-2021-046

License Amendment:

Yes ☐ No ☒

Exemption:

Yes ☐ No ☒

Unit 3 Amendment No.:

N/A

Unit 4 Amendment No.:

N/A

Departure Title: Office Area HVAC Subsystem Humidifier

Brief Description of the Plant-Specific Departure:

This departure removed the requirement to provide a minimum space relative humidity for the areas serviced by the office area handling units, thus removing the need for a humidifier in the system serving that area.

This departure resulted in changes to the UFSAR (plant-specific DCD).

Summary of the Evaluation:

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

This departure did not involve a change to Tier 1 information, Tier 2* information, or the Technical Specifications. A 10 CFR 52 Appendix D, Section VIII screening/simplified evaluation determined that NRC approval was not required prior to implementing this departure.

ND-22-0419

Enclosure 2

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of
November 12, 2021 through May 11, 2022

Departure Number: LDCR-2021-049

License Amendment: Yes ☐ No ☒

Exemption: Yes ☐ No ☒

Unit 3 Amendment No.: N/A

Unit 4 Amendment No.: N/A

Departure Title: Adding Missing Notes to the Annex Normal Operation/Shutdown
Radiation Zone Drawings

Brief Description of the Plant-Specific Departure:

This departure provided three annex building rooms with a note explaining that while the rooms are typically Zone I, they may temporarily reach Zone II locally as a result of transient sources in the room(s) located below.

This departure resulted in changes to the UFSAR (plant-specific DCD).

Summary of the Evaluation:

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

This departure did not involve a change to Tier 1 information, Tier 2* information, or the Technical Specifications. A 10 CFR 52 Appendix D, Section VIII screening/simplified evaluation determined that NRC approval was not required prior to implementing this departure.

ND-22-0419

Enclosure 2

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of
November 12, 2021 through May 11, 2022

Departure Number: LDCR-2021-053

License Amendment:

Yes ☐ No ☒

Exemption:

Yes ☐ No ☒

Unit 3 Amendment No.:

N/A

Unit 4 Amendment No.:

N/A

Departure Title: WLS Degasifier Purge Addition

Brief Description of the Plant-Specific Departure:

This departure added a continuous purge line, including a degasifier vacuum purge pump, to the liquid radwaste system (WLS) degasifier column. The departure also describes that the degasifier vacuum purge pump is stopped upon indication of a fire in the charcoal delay beds. The departure also revised the description of the plant conformance with Regulatory Guide (RG) 1.112, Revision 0-R, to specify that plant-specific adsorption coefficients are used instead of the generic adsorption coefficients defined in NUREG-0017, Revision 1.

This departure resulted in changes to the UFSAR (plant-specific DCD).

Summary of the Evaluation:

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

This departure did not involve a change to Tier 1 information, Tier 2* information, or the Technical Specifications. A 10 CFR 52 Appendix D, Section VIII screening/simplified evaluation determined that NRC approval was not required prior to implementing this departure.

ND-22-0419

Enclosure 2

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of
November 12, 2021 through May 11, 2022

Departure Number: LDCR-2022-004

License Amendment:

Yes ☐ No ☒

Exemption:

Yes ☐ No ☒

Unit 3 Amendment No.:

N/A

Unit 4 Amendment No.:

N/A

Departure Title: PCS Recirculation Pump Modification

Brief Description of the Plant-Specific Departure:

This departure changed the nominal design total differential head of the passive containment cooling system (PCS) recirculation pump. This departure also revised the post-72 hours nominal load requirements for the PCS recirculation pumps and ancillary generator fuel tank heater.

This departure resulted in changes to the UFSAR (plant-specific DCD).

Summary of the Evaluation:

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

This departure did not involve a change to Tier 1 information, Tier 2* information, or the Technical Specifications. A 10 CFR 52 Appendix D, Section VIII screening/simplified evaluation determined that NRC approval was not required prior to implementing this departure.

ND-22-0419

Enclosure 2

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of
November 12, 2021 through May 11, 2022

Departure Number: LDCR-2022-006

License Amendment:

Yes ☐ No ☒

Exemption:

Yes ☐ No ☒

Unit 3 Amendment No.:

N/A

Unit 4 Amendment No.:

N/A

Departure Title: Modifications to Room 40404 Air Transfer

Brief Description of the Plant-Specific Departure:

This departure removed the airflow path between the Control Support Area (CSA) and the toilet room serving the CSA and removed this toilet room from the CSA pressure boundary. Additionally, this departure reduced the gross volume of the CSA which resulted in recalculated radiation doses.

This departure resulted in changes to the UFSAR (plant-specific DCD).

Summary of the Evaluation:

This change did not result in a deviation from plant-specific DCD design information such that there was more than a minimal increase in the frequency of occurrence of an accident, likelihood of the occurrence of a malfunction of a structure, system, or component (SSC) important to safety, consequences of an accident or malfunction; create the possibility of an accident of a different type or malfunction with a different result; result in a design basis limit for a fission product barrier being exceeded or altered; result in a departure from a method of evaluation; or result in a substantial increase in the probability of an ex-vessel severe accident previously determined to not be credible such that it would become credible.

This departure did not involve a change to plant-specific Tier 1 information, Tier 2* information, or the Technical Specifications. A 10 CFR 52 Appendix D Section VIII evaluation determined that NRC approval is not required prior to implementing this departure.

ND-22-0419

Enclosure 2

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of
November 12, 2021 through May 11, 2022

Departure Number: LDCR-2022-007

License Amendment:

Yes ☐ No ☒

Exemption:

Yes ☐ No ☒

Unit 3 Amendment No.:

N/A

Unit 4 Amendment No.:

N/A

Departure Title: NFPA 22 FPS Fire Water Tank Compliance

Brief Description of the Plant-Specific Departure:

This departure documented an exception to an NFPA 22 requirement regarding the orientation of the flow discharge from the over-the-top fill line of the fire water storage tanks.

This departure resulted in changes to the UFSAR (plant-specific DCD).

Summary of the Evaluation:

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

This departure did not involve a change to Tier 1 information, Tier 2* information, or the Technical Specifications. A 10 CFR 52 Appendix D, Section VIII screening/simplified evaluation determined that NRC approval was not required prior to implementing this departure.

ND-22-0419

Enclosure 2

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of
November 12, 2021 through May 11, 2022

Departure Number: LDCR-2022-014

License Amendment:

Yes ☐ No ☒

Exemption:

Yes ☐ No ☒

Unit 3 Amendment No.:

N/A

Unit 4 Amendment No.:

N/A

Departure Title: Emergency Boration Nomenclature

Brief Description of the Plant-Specific Departure:

This departure clarified the term “emergency boration” and the appropriate control rod insertion alarm that requires boration.

This departure resulted in changes to the UFSAR (plant-specific DCD) and the Technical Specifications Bases.

Summary of the Evaluation:

This plant-specific departure and the Technical Specification Bases change activity do not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, has no impact on plant operating procedures or a method of control that adversely affects a design function, does not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, does not represent tests or experiments outside the reference bounds of the design basis, and does not alter the assumptions or results of the ex-vessel severe accident assessment.

This departure and activity do not involve a change to Tier 1 information, Tier 2* information, or the Technical Specifications. A 10 CFR 52 Appendix D, Section VIII screening/simplified evaluation determined that NRC approval was not required prior to implementing these changes.

ND-22-0419

Enclosure 2

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of
November 12, 2021 through May 11, 2022

Departure Number: LDCR-2022-017

License Amendment: Yes ☐ No ☒

Exemption: Yes ☐ No ☒

Unit 3 Amendment No.: N/A

Unit 4 Amendment No.: N/A

Departure Title: Diesel Generator Automatic Load Sequencer Timing Clarification

Brief Description of the Plant-Specific Departure:

This departure revised the diesel generator operational testing to reflect changes to the automatic load sequencer logic, sequence internals, and appropriate sequencing.

This departure resulted in changes to the UFSAR (plant-specific DCD).

Summary of the Evaluation:

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

This departure did not involve a change to Tier 1 information, Tier 2* information, or the Technical Specifications. A 10 CFR 52 Appendix D, Section VIII screening/simplified evaluation determined that NRC approval was not required prior to implementing this departure.

ND-22-0419

Enclosure 2

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of
November 12, 2021 through May 11, 2022

Departure Number: LDCR-2022-018

License Amendment:

Yes ☐ No ☒

Exemption:

Yes ☐ No ☒

Unit 3 Amendment No.:

N/A

Unit 4 Amendment No.:

N/A

Departure Title: Auxiliary Steam Supply System Capabilities

Brief Description of the Plant-Specific Departure:

This departure revised the design description of the capability and use of the auxiliary steam supply system during the condensate system and feedwater system recirculation and cleanup operation steps and during plant heatup following these steps.

This departure resulted in changes to the UFSAR (plant-specific DCD).

Summary of the Evaluation:

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

This departure did not involve a change to Tier 1 information, Tier 2* information, or the Technical Specifications. A 10 CFR 52 Appendix D, Section VIII screening/simplified evaluation determined that NRC approval was not required prior to implementing this departure.

ND-22-0419

Enclosure 2

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of
November 12, 2021 through May 11, 2022

Departure Number: LDCR-2022-019

License Amendment: Yes ☐ No ☒

Exemption: Yes ☐ No ☒

Unit 3 Amendment No.: N/A

Unit 4 Amendment No.: N/A

Departure Title: UFSAR Table 6.2.3-1 Update for Alternate Containment Leak Rate Type
Tests

Brief Description of the Plant-Specific Departure:

This departure clarified that alternate Type tests can be used for repair and modification activities in accordance with regulatory guidance.

This departure resulted in changes to the UFSAR (plant-specific DCD).

Summary of the Evaluation:

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

This departure did not involve a change to Tier 1 information, Tier 2* information, or the Technical Specifications. A 10 CFR 52 Appendix D, Section VIII screening/simplified evaluation determined that NRC approval was not required prior to implementing this departure.

ND-22-0419

Enclosure 2

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of November 12, 2021 through May 11, 2022

Departure Number: LDCR-2022-020

License Amendment: Yes ☐ No ☒

Exemption: Yes ☐ No ☒

Unit 3 Amendment No.: N/A

Unit 4 Amendment No.: N/A

Departure Title: Safety Classification of ASME Pipe Caps and Plugs

Brief Description of the Plant-Specific Departure:

This departure added a note to the simplified piping and instrumentation diagrams for the normal residual heat removal system, containment leak rate test system, passive core cooling system, main control room habitability system, spent fuel pool cooling system, component cooling water system, central chilled water system, compressed and instrument air system, primary sampling system, chemical and volume control system, containment air filtration system, and fire protection system. The note clarifies that the caps and plugs are nonsafety Class E, ASME B31.1 and can be installed in accordance with the nonsafety requirements.

The departure added a cap to the demineralized water transfer and storage system with a note clarifying that the caps and plugs are nonsafety Class E, ASME B31.1 and can be installed in accordance with the nonsafety requirements.

This departure replaced the quick disconnects with caps or test flanges, and a note was added to clarify that caps and plugs are nonsafety Class E, ASME B31.1 and can be installed in accordance with nonsafety requirements.

This departure resulted in changes to the UFSAR (plant-specific DCD).

Summary of the Evaluation:

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

This departure did not involve a change to Tier 1 information, Tier 2* information, or the Technical Specifications. A 10 CFR 52 Appendix D, Section VIII screening/simplified evaluation determined that NRC approval was not required prior to implementing this departure.