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ND-14-1636
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U.S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4
Response to
Request for Additional Information Related to
License Amendment and Exemption:
Tier 1 Editorial and Consistency Changes (LAR-14-002S1)

Ladies and Gentlemen:

By letter dated July 29, 2014, SNC submitted a request for a license amendment and exemption, SNC correspondence ND-14-0891, to allow various changes to correct editorial errors in Tier 1 and promote consistency with the Updated Final Safety Analysis Report (UFSAR) Tier 2 information. The Nuclear Regulatory Commission (NRC) staff issued Request for Additional Information (RAI) Letter No. 1, also referred to as electronic RAI (eRAI) 7695, and RAI Letter No. 2, also referred to as eRAI 7706, associated with License Amendment Request (LAR) 14-002, via electronic mail dated October 8, 2014 and October 22, 2014 [ADAMS Accession No. ML14281A823 and ML14295A785, respectively]. Enclosure 4 to this letter provides the response to RAI Letter No. 1 and No. 2. Enclosures 1, 2, and 3 were provided with the original submittal of the LAR. The RAI responses include revisions to Enclosure 1 of the LAR.

The supplemental information provided in this letter does not impact the scope or conclusions of the technical evaluation, regulatory evaluation (including the significant hazards consideration determination), or environmental considerations of the original LAR or exemption request. This letter contains no regulatory commitments.

With this letter SNC also requests the date for the staff approval of the license amendment and exemption be revised from January 9, 2015 to February 13, 2015.

In accordance with 10 CFR 50.91, SNC is notifying the State of Georgia of this LAR supplement by transmitting a copy of this letter and enclosure to the designated State Official.

Should you have any questions, please contact Mr. Jason Redd at (205) 992-6435.

Mr. Brian H. Whitley states that: he is the Regulatory Affairs Director of Southern Nuclear Operating Company; he is authorized to execute this oath on behalf of Southern Nuclear Operating Company; and to the best of his knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY


Brian H. Whitley

BHW/WES/ljs

Sworn to and subscribed before me this 5th day of November, 2014

Notary Public: Kristin Marie Seibert

My commission expires: August 16, 2016

Enclosures: 1 - 3 (previously submitted with the original LAR-14-002 in SNC Letter ND-14-0891)



Enclosure 4 Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Response to NRC Request for Additional Information Letter No. 1 and No. 2 Related to LAR-14-002 (LAR-14-002S1)

cc:

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Southern Nuclear Operating Company

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Enclosure 4

**[Note that Enclosures 1, 2, and 3 were provided with the original License
Amendment Request (LAR) LAR-14-002]**

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

Response to NRC Request for Additional Information Letter No. 1 and No. 2

Related to LAR-14-002

(LAR-14-002S1)

(This enclosure contains three pages, including this cover page)

eRAI Tracking No. 7695

Question 1:

In its letter dated July 29, 2014, the licensee for Vogtle Electric Generating Plant (VEGP) Units 3 and 4 submitted License Amendment Request (LAR) 14-002 to request an amendment to the COLs for VEGP Units 3 and 4 to allow various changes to correct editorial errors in Tier 1 and promote consistency with the Updated Final Safety Analysis Report (UFSAR) Tier 2 information. The licensee indicates in the "Summary Description" section that for each COL Appendix C change, an exemption necessary to implement the corresponding change in the plant-specific Tier 1 is also requested. In the "Detailed Description and Technical Evaluation" section, a list of "Proposed COL Appendix C Changes" is provided. For some changes, such as items (t) and (u), both Appendix C and Tier 1 are referenced for corresponding modifications. However, some changes, such as items (d), (f), (i), (l), and (n), only specify that Appendix C will be modified. The specification of Appendix C and Tier 1 modifications for each item in the request should be clarified.

Response to Question 1:

SNC will revise Enclosure 1, "Detailed Description and Technical Evaluation" section items (t) and (u) in the list of "Proposed COL Appendix C Changes" to only request a change to COL Appendix C. The reference to Tier 1 in the context of the proposed change will be removed from the Enclosure 1 License Amendment Request.

The two items are revised to read as follows:

- t) Table 2.3.2-1 – Valve CVS-PL-V092 resides within a harsh environment rated room within the Auxiliary Building, and design documentation and UFSAR (Tier 2) Table 3.11-1 specify that valve CVS-PL-V092 is to be harsh environmentally qualified. However, COL Appendix C and Tier 1 Table 2.3.2-1 states that CVS-PL-V092 is not harsh environmentally qualified. Therefore, it is proposed that COL Appendix C Table 2.3.2-1, the CVS-PL-V092 "Qual. for Harsh Envir." indication be changed from "No" to "Yes."
- u) Table 2.3.2-1 – VEGP Amendment Number 12 (Reference 1) approved changes to various design features of the Chemical and Volume Control System (CVS). As part of the change, valve CVS-PL-V219 was added to the CVS design in COL Appendix C and Tier 1 Table 2.3.2-1 and UFSAR (Tier 2) Table 3.11-1. The valve is to be installed in a harsh environment, thus should be shown in the licensing basis as being qualified for a harsh environment. The valve is identified as qualified for a harsh environment in UFSAR (Tier 2) Table 3.11-1. However COL Appendix C and Tier 1 Table 2.3.2-1 indicate the valve as not being qualified for a harsh environment. Therefore in COL Appendix C Table 2.3.2-1, the CVS-PL-V219 "Qual. for Harsh Envir." indication is proposed to be changed from "No" to "Yes."

eRAI Tracking No. 7706

Question 2:

Vogtle Electric Generating Plant Units 3 and 4 license amendment request LAR-14-002 contains proposed plant-specific Tier 1 changes. Item (b) states that Table 2.2.3-4 Item 6 acceptance criterion incorrectly refers to “RCS” piping instead of the intended “PXS” piping. Therefore an editorial change is requested to replace “RCS” with “PXS”. The staff notes that both RCS and PXS lines appear to be identified in Table 2.2.3-2 as being designed for Leak Before Break.

1. Are only the PXS lines included in the design commitment found in Item 6 of Table 2.2.3-4? If both PXS and RCS lines are included, a proposed change should ensure that this is captured in the acceptance criteria.

Response to Question 2:

The system designators for the piping line numbers in Table 2.2.3-2 are indicative of the piping stress package that the piping line is included in for qualification. Piping stress packages are evaluated anchor to anchor. This does not necessary correlate perfectly with system boundaries in all cases. Table 2.2.3-2 is organized by system description which could include portions of a piping package with a different system designator for this reason.

The ITAAC performance and documentation plans require that the ITAAC be met for all piping in Table 2.2.3-2, not just piping with a PXS system designator. For the purposes of Table 2.2.3-2 (and other similar ITAAC tables), the piping in the table is considered PXS piping since it is included in the PXS ITAACs.

Therefore, both the PXS and RCS lines identified in Table 2.2.3-2 are included in the acceptance criteria for Item 6 of Table 2.2.3-4. Referring only to the PXS in Table 2.2.3-4 Item 6 is appropriate, and no additional change is needed.