

Southern Nuclear Operating Company  
Vogtle Electric Generating Plant, Units 3 & 4  
COL Application

**COLA Table of Contents**

Part 1 — General and Financial Information

Part 2 — Final Safety Analysis Report

Part 3 — Applicant's Environmental Report - Combined License Stage

Part 4 — Technical Specifications

Part 5 — Emergency Plan

Part 6 — LWA Request

Part 7 — Departures, Exemptions, and Variances

Part 8 — Safeguards/Security Plans

Part 9 — Withheld Information

Part 10 — Proposed License Conditions (Including ITAAC)

Part 11 — Enclosures

**Vogtle Early Site Permit Application**

Overall Table of Contents

---

**Vogtle Electric Generating Plant, Units 3 & 4**

**COL Application**

**Part 7**

**Departures, Exemptions, and Variances**

**Revision 0**

**Vogtle Electric Generating Plant, Units 3 & 4  
COL Application  
Part 7 — Departures, Exemptions, and Variances**

**A. STD and VEGP Departures**

This Departure Report includes deviations in the VEGP COL application FSAR from the information in the AP1000 Design Control Document (DCD), pursuant to 10 CFR Part 52, Appendix D, section VIII and section X.B.1.

The following departures are described and evaluated in detail in this report.

<b><u>Departure Number</u></b>	<b><u>Description</u></b>
VEGP DEP 1.1-1	Administrative departure for organization and numbering for the FSAR sections
VEGP DEP 3.4-1	Alternate Waterproof Membrane
VEGP DEP 9.2-1	Potable Water System (PWS) filtration
VEGP DEP 18.8-1	Emergency Response Facility Locations

Departure number VEGP DEP 18.8-1 is a change to Tier 2\* information in the DCD, and prior NRC approval is required. The change is described and evaluated in the VEGP Units 3 and 4 **ESPA Part 5** (Emergency Plan).

**Vogle Electric Generating Plant, Units 3 & 4**  
**COL Application**  
**Part 7 — Departures, Exemptions, and Variances**

Departure Number: VEGP DEP 1.1-1

Affected DCD/FSAR Sections: 2.1.1, 2.1.4, 2.2.1, 2.2.4, 2.4.1, 2.4.15, 2.5, 2.5.7, 9.2.11, 9.2.12, 9.2.13, 9.5.1.8, 9.5.1.9, 13.1, 13.3.6, 13.5, 13.7, 17.5, 17.6, 17.7, 17.8

Summary of Departure:

This FSAR generally follows the AP1000 DCD organization and numbering. Some organization and numbering differences are adopted where necessary to include additional material, such as additional content identified in Regulatory Guide 1.206.

The VEGP ESPA follows organization and numbering practices enumerated in Review Standard RS-002, Regulatory Guide 1.70, and NUREG-0800 (see ESPA Table 1-2).

Scope/Extent of Departure:

The renumbered sections associated with this departure are identified in the FSAR (at the sections identified above).

Departure Justification:

An administrative departure is established to identify instances where the renumbering of FSAR sections is necessary to effectively include content consistent with Regulatory Guide 1.206, as well as NUREG-0800, Standard Review Plan.

Departure Evaluation:

This Tier 2 departure is an administrative change that affects only section numbering of the indicated FSAR sections. Accordingly, it does not:

1. Result in more than a minimal increase in the frequency of occurrence of an accident previously evaluated in the plant-specific DCD;
2. Result in more than a minimal increase in the likelihood of occurrence of a malfunction of a structure, system, or component (SSC) important to safety and previously evaluated in the plant-specific DCD;
3. Result in more than a minimal increase in the consequences of an accident previously evaluated in the plant-specific DCD;

**Vogtle Electric Generating Plant, Units 3 & 4**  
**COL Application**  
**Part 7 — Departures, Exemptions, and Variances**

4. Result in more than a minimal increase in the consequences of a malfunction of an SSC important to safety previously evaluated in the plant-specific DCD;
5. Create a possibility for an accident of a different type than any evaluated previously in the plant-specific DCD;
6. Create a possibility for a malfunction of an SSC important to safety with a different result than any evaluated previously in the plant-specific DCD;
7. Result in a design basis limit for a fission product barrier as described in the plant-specific DCD being exceeded or altered; or
8. Result in a departure from a method of evaluation described in the plant-specific DCD used in establishing the design bases or in the safety analyses.

This Tier 2 departure does not affect resolution of an ex-vessel severe accident design feature identified in the plant-specific DCD.

Therefore, this departure has no safety significance.

**Vogtle Electric Generating Plant, Units 3 & 4**  
**COL Application**  
**Part 7 — Departures, Exemptions, and Variances**

Departure Number: VEGP DEP 3.4-1

Affected DCD/FSAR Sections: 3.4.1, DCD Figures 3.4-1, 3.4-2 and 3.4-3

Summary of Departure:

DCD Subsection 3.4.1.1.1 describes protection of seismic Category I structures from external flooding. The DCD indicates that this protection is provided by a waterproofing system that is provided by the introduction of a cementitious crystalline waterproofing additive to the mud mat and to the retention wall. The configuration of this waterproofing is shown in DCD Figure 3.4-3. Alternate waterproofing approaches for mechanically stabilized earth (MSE) and step back configurations using high density polyethylene (HDPE) double-sided textured waterproof membrane are described and presented in DCD Figures 3.4-1 and 3.4-2.

For Vogtle Electric Generating Plant (VEGP) Units 3 and 4 an additional alternate waterproofing system is presented as a departure from the DCD design options. This alternate waterproofing system is discussed in the Early Site Permit Application (ESPA), Site Safety Analysis Report (SSAR), [Subsections 2.5.4.5.7 and 3.8.5](#). The proposed configuration is also shown in [ESPA SSAR Figure 2.5.4-17](#), and a qualification program that includes testing to satisfy the waterproof membrane ITAAC is discussed in [ESPA SSAR Subsection 3.8.5](#).

Scope/Extent of Departure:

This departure is identified in [FSAR Subsection 3.4.1.1.1](#).

Departure Justification:

The proposed membrane will provide a level of waterproofing for the below grade portions of seismic Category I structures that is consistent with the level of waterproofing provided by the DCD design.

The specific material for the waterproof membrane has not been selected. However, as discussed in [ESPA SSAR Subsection 3.8.5](#), the membrane selected will be subject to a qualification program that will address, among other things:

- Physical properties, including surface and texture
- Environmental aging
- Surface finish requirements
- Installation procedures

**Vogle Electric Generating Plant, Units 3 & 4**  
**COL Application**  
**Part 7 — Departures, Exemptions, and Variances**

Site specific ITAAC is provided in Part 10 to confirm the configuration of the waterproof membrane and the mudmats above and below the membrane. The selected waterproof system installation methodology is established as part of the procurement specification and is developed by the manufacturer. If a spray-applied elastomeric waterproofing membrane system is selected, the application method will be established through manufacturer testing to meet the design specification. Post installation testing will determine the continuity of the surface and validation of the required coating thickness through a combination of visual inspection of the film and dielectric testing during and following application.

Based upon these requirements, it is concluded that the installed waterproof membrane will provide a level of protection from external flooding that is consistent with that of the existing DCD design alternatives.

Therefore, this change does not adversely affect any safety-related structure, system, or component (SSC), or conflict with applicable regulatory guidance.

Departure Evaluation:

This Tier 2 departure does not adversely impact the below grade portions for seismic Category I structures. Accordingly, it does not:

1. Result in more than a minimal increase in the frequency of occurrence of an accident previously evaluated in the plant-specific DCD;
2. Result in more than a minimal increase in the likelihood of occurrence of a malfunction of a structure, system, or component (SSC) important to safety and previously evaluated in the plant-specific DCD;
3. Result in more than a minimal increase in the consequences of an accident previously evaluated in the plant-specific DCD;
4. Result in more than a minimal increase in the consequences of a malfunction of an SSC important to safety previously evaluated in the plant-specific DCD;
5. Create a possibility for an accident of a different type than any evaluated previously in the plant-specific DCD;
6. Create a possibility for a malfunction of an SSC important to safety with a different result than any evaluated previously in the plant-specific DCD;
7. Result in a design basis limit for a fission product barrier as described in the plant-specific DCD being exceeded or altered; or

**Vogtle Electric Generating Plant, Units 3 & 4**  
**COL Application**  
**Part 7 — Departures, Exemptions, and Variances**

8. Result in a departure from a method of evaluation described in the plant-specific DCD used in establishing the design bases or in the safety analyses.

This Tier 2 departure does not affect resolution of an ex-vessel severe accident design feature identified in the plant-specific DCD.

Therefore, this departure has no safety significance.

**Vogle Electric Generating Plant, Units 3 & 4**  
**COL Application**  
**Part 7 — Departures, Exemptions, and Variances**

Departure Number: VEGP DEP 9.2-1

Affected DCD/FSAR Sections: 9.2.5.3

Summary of Departure:

The DCD states that filtered water is supplied from a site-specific water source for the potable water system (PWS). At Vogle, the PWS is supplied by the well water subsystem of the Raw Water System (RWS). Filtration of the PWS source is not required.

Scope/Extent of Departure:

This departure is identified in **FSAR Section 9.2**.

Departure Justification:

The source water for the PWS is from plant deep wells, similar to the source water for Unit 1 and 2. Based on Unit 1 and 2 plant experience, the well water quality is such that no additional filtration is required. The PWS source meets applicable Georgia Environmental Protection Division standards for safe drinking water. This departure does not adversely affect any safety-related system, nor does it conflict with applicable regulatory guidance.

Departure Evaluation:

This Tier 2 departure is associated with a non safety-related system. It results in suitable drinking water and does not adversely impact the potable water system. Accordingly, it does not:

1. Result in more than a minimal increase in the frequency of occurrence of an accident previously evaluated in the plant-specific DCD;
2. Result in more than a minimal increase in the likelihood of occurrence of a malfunction of a structure, system, or component (SSC) important to safety and previously evaluated in the plant-specific DCD;
3. Result in more than a minimal increase in the consequences of an accident previously evaluated in the plant-specific DCD;
4. Result in more than a minimal increase in the consequences of a malfunction of an SSC important to safety previously evaluated in the plant-specific DCD;
5. Create a possibility for an accident of a different type than any evaluated previously in the plant-specific DCD;

**Vogtle Electric Generating Plant, Units 3 & 4**  
**COL Application**  
**Part 7 — Departures, Exemptions, and Variances**

6. Create a possibility for a malfunction of an SSC important to safety with a different result than any evaluated previously in the plant-specific DCD;
7. Result in a design basis limit for a fission product barrier as described in the plant-specific DCD being exceeded or altered; or
8. Result in a departure from a method of evaluation described in the plant-specific DCD used in establishing the design bases or in the safety analyses.

This Tier 2 departure does not affect resolution of an ex-vessel severe accident design feature identified in the plant-specific DCD.

Therefore, this departure has no safety significance.

**Vogle Electric Generating Plant, Units 3 & 4**  
**COL Application**  
**Part 7 — Departures, Exemptions, and Variances**

Departure Number: VEGP DEP 18.8-1

Affected DCD/FSAR Sections: 1.2, 9A, 12.3, 12.5.2.2, 13.3.8, 18.8.3.5, and 18.8.3.6

Summary of Departure:

At VEGP, the Technical Support Center (TSC) is not located in the control support area (CSA) as identified in **DCD Subsection 18.8.3.5**; the TSC location is as described in the **ESPA Part 5** (Emergency Plan).

Additionally, the Operations Support Center (OSC) is also being moved from the location identified in **DCD Subsections 12.5.2.2** and **18.8.3.6** and as identified on DCD figures in Subsections 1.2 and 12.3, and Appendix 9A. The OSC location is as described in **ESPA Part 5**.

Scope/Extent of Departure:

This departure is identified in **FSAR Subsection 18.8.3.5** and **18.8.3.6**. Additionally, this departure is identified on **FSAR Figures 1.1-202, 9A-201, 12.3-201, 12.3-202, and 12.3-203**. These figures replace DCD Figures 1.2-18, 9A-3 (Sheet 1 of 3), 12.3-1 (Sheet 11 of 16), 12.3-2 (Sheet 11 of 15), and 12.3-3 (Sheet 11 of 16).

Departure Justification:

The referenced DCD states “The TSC is located in the control support area (CSA).” This is not the case for VEGP. The TSC location is moved to a central location such that a single TSC can serve both VEGP Units 3 and 4 as identified in the Emergency Plan. The referenced DCD also states “The ALARA briefing and operational support center is located off the main corridor immediately beyond the main entry to the annex building” and indicates that the OSC location is identified on Figure 1.2-18. At VEGP Units 3 and 4, the OSC is located in the Unit 3 and 4 control support areas, vacated by relocating the unit TSCs to a common site TSC, to better utilize the available space.

Departure Evaluation:

- I. Relocation of the OSC — This Tier 2 departure is for a non safety-related system, and the alternate location of the OSC meets applicable requirements. Relocating the OSC does not adversely affect its function and, therefore, this departure does not:
  1. Result in more than a minimal increase in the frequency of occurrence of an accident previously evaluated in the plant-specific DCD;

**Vogtle Electric Generating Plant, Units 3 & 4**  
**COL Application**  
**Part 7 — Departures, Exemptions, and Variances**

2. Result in more than a minimal increase in the likelihood of occurrence of a malfunction of a structure, system, or component (SSC) important to safety and previously evaluated in the plant-specific DCD;
3. Result in more than a minimal increase in the consequences of an accident previously evaluated in the plant-specific DCD;
4. Result in more than a minimal increase in the consequences of a malfunction of an SSC important to safety previously evaluated in the plant-specific DCD;
5. Create a possibility for an accident of a different type than any evaluated previously in the plant-specific DCD;
6. Create a possibility for a malfunction of an SSC important to safety with a different result than any evaluated previously in the plant-specific DCD;
7. Result in a design basis limit for a fission product barrier as described in the plant-specific DCD being exceeded or altered; or
8. Result in a departure from a method of evaluation described in the plant-specific DCD used in establishing the design bases or in the safety analyses.

This Tier 2 departure does not affect resolution of an ex-vessel severe accident design feature identified in the plant-specific DCD.

Therefore, this departure has no safety significance.

- II. Relocation of the TSC — This Tier 2\* departure from DCD Subsection 18.8.3.5 requires prior NRC approval in accordance with 10 CFR 52 Appendix D, Section VIII.B.6.b. The details regarding the proposed TSC location and features are provided in **ESPA Part 5** (Emergency Plan). Approval of the Tier 2\* departure is requested as part of this COLA.

**Vogle Electric Generating Plant, Units 3 & 4**  
**COL Application**  
**Part 7 — Departures, Exemptions, and Variances**

**B. VEGP Exemption Requests**

SNC requires the following exemptions related to:

1. Fitness-for-Duty Program Description
2. Combined License Application Organization and Numbering

Discussion and justifications for each of these requests is provided in the following pages.

**Vogtle Electric Generating Plant, Units 3 & 4  
COL Application  
Part 7 — Departures, Exemptions, and Variances**

**1) Fitness for Duty Program Description (10 CFR Part 26)**

Applicable Regulation(s): 10 CFR 52.79(a)(44)

Specific wording from which a schedule exemption is requested:

(a) The application must contain a final safety analysis report that describes the facility, presents the design bases and the limits on its operation, and presents a safety analysis of the structures, systems, and components of the facility as a whole. The final safety analysis report shall include the following information, at a level of information sufficient to enable the Commission to reach a final conclusion on all safety matters that must be resolved by the Commission before issuance of a combined license:

(44) A description of the fitness-for-duty program required by 10 CFR part 26 and its implementation.

Pursuant to 10 CFR 52.7 and 52.93 (as amended and promulgated effective Sept. 27, 2007), Southern Nuclear Operating Company (SNC) requests a schedule exemption from the requirement of 10 CFR 52.79(a)(44) to provide a “description of the fitness-for-duty program required by 10 CFR part 26 and its implementation” in its application for a combined operating license for the Vogtle Electric Generating Plant (VEGP). SNC proposes to provide the FFD Program description required by 10 CFR 52.79(a)(44) based on the revised 10 CFR Part 26 regulations that are expected to be promulgated and become effective in 2008 since these are the regulations that are expected to be in effect at the time of implementation of the program.

Discussion:

In an April 17, 2007, affirmation session (ADAMS ML071070361), the Commission approved a final rule amending FFD regulations in 10 CFR Part 26 for both the construction and operating phases for a new nuclear plant. The new and revised Part 26 regulations are expected to be promulgated and become effective in 2008. Implementation of a fitness for duty program (for construction and operation) for VEGP Units 3 and 4 is not expected to be required until after 2008. An FFD program description was provided in [ESPA SSAR Section 13.7](#) for the scope of the Limited Work Authorization request.

The construction phase of the Fitness for Duty Program as applied to new plants is not required to be implemented until the commencement of on-site construction of safety or security-related systems, structures and components. SNC will not begin these activities until after the amendments to 10 CFR Part 26 regulations are expected to take effect. The operational phase of the FFD Program is required to be implemented prior to fuel load.

In view of the near-term effectiveness of new FFD regulations, it would be more efficient for both SNC and the NRC to submit the FFD Program description required by 10 CFR 52.79(a)(44) based on the revised Part 26 rules rather than

**Vogle Electric Generating Plant, Units 3 & 4**  
**COL Application**  
**Part 7 — Departures, Exemptions, and Variances**

the rules currently in effect. Accordingly, SNC hereby submits a request for a schedule exemption from current Part 52 regulations pursuant to 10 CFR 52.7, “Specific exemptions,” and 10 CFR 52.93, “Exemptions and variances.”

Granting this request, which is authorized by law, would allow the NRC to conduct its acceptance review of the VEGP COL application based on the revised rules that will become effective in the near future. SNC does not expect the NRC to issue the requested COL until the revised FFD rules take effect. For this and other reasons, granting this exemption request will not present an undue risk to the public health and safety, and is consistent with the common defense and security.

The pending amendments to Part 26 create “special circumstances,” as defined in 10 CFR 50.12 (Specific Exemptions) that warrant granting this exemption. Applying the current Fitness for Duty regulations in reviewing the FFD Program description required by 10 CFR 52.79(a)(44) would not serve, and is not necessary to achieve, the underlying purposes of the rule. Further, the underlying purpose of 10 CFR 52.79(a)(44) can be satisfied by meeting the requirements of the revised FFD regulations that will become effective in the near future.

Moreover, compliance with the current rule would cause undue hardship for SNC and would also be inefficient and burdensome for the NRC staff. That approach would require SNC to prepare, and the NRC to review, information based on Fitness for Duty regulations that will soon be superseded by Part 26 amendments, and then (presumably) complete a similar submittal under the revised FFD rules.

For these reasons, SNC requests approval of the requested schedule exemption from the Part 52 requirements to provide a description (in the FSAR) of the fitness for duty program that meets the current Part 26 Fitness for Duty regulations.

**Vogtle Electric Generating Plant, Units 3 & 4  
COL Application  
Part 7 — Departures, Exemptions, and Variances**

**2) Combined License Application Organization and Numbering (Part 52, Appendix D)**

Applicable Regulation(s): 10 CFR Part 52, Appendix D, Section IV.A.2.a

Specific wording from which exemption is requested:

IV. Additional Requirements and Restrictions

A. An applicant for a combined license that wishes to reference this appendix shall, in addition to complying with the requirements of 10 CFR 52.77, 52.78, and 52.79, comply with the following requirements:

1. Incorporate by reference, as part of its application, this appendix.

2. Include, as part of its application:

a. A plant-specific DCD containing the same type of information and using the same organization and numbering as the generic DCD for the AP1000 design, as modified and supplemented by the applicant's exemptions and departures;

Pursuant to 10 CFR 52.7 and 52.93 (as amended and promulgated effective September 27, 2007), Southern Nuclear Operating Company (SNC) requests an exemption from the requirement of 10 CFR 52, Appendix D, Section IV.A.2.a, to include a plant-specific DCD "containing the same type of information and using the same organization and numbering as the generic DCD for the AP1000 design..." While the Vogtle Electric Generating Plant (VEGP) plant-specific DCD (i.e., the FSAR) contains the same type of information and generally follows the same organization and numbering as the generic DCD for the AP1000 design, a limited number of subsections of the FSAR and the referenced Early Site Permit Application, (as identified in departures report item VEGP DEP 1.1-1), do not follow the "same organization and numbering as the generic DCD for the AP1000 design." SNC proposes to provide the VEGP Units 3 and 4 FSAR with some administrative revisions to the organization and numbering of the AP1000 DCD.

Discussion:

The AP1000 Design Control Document (DCD) generally has an organization and numbering format that provides text by subject in general conformance with the Standard Review Plan (SRP) in effect at the time the DCD was written. Generally, COL information items are included at the end of a chapter, section, or subsection. In some cases, such as the DCD Sections 2.1 and 2.2, the section may consist solely of a short description of the topic and the COL information item subsection. This organization and numbering does not allow for the detailed discussion of the topics to be included in a complete FSAR section. As such, it is necessary to include numerous additional subsections to fully address the topics identified in the guidance of Regulatory Guide 1.206 and the applicable SRP. In other cases, the organization and numbering must be modified slightly to allow for inclusion of plant-specific discussions within the appropriate section of the FSAR, such as including an additional water system description in Section 9.2. In these cases, the COL information item discussions are retained at the end of the DCD corresponding chapter, section, or subsection (to maintain the organization), but the numbering may be different.

**Vogtle Electric Generating Plant, Units 3 & 4**  
**COL Application**  
**Part 7 — Departures, Exemptions, and Variances**

These differences are well identified in the FSAR as VEGP DEP 1.1-1 at each location where the organization and numbering departure is taken and are considered to be purely administrative to support a logical construction of the document. Where the departure from the DCD organization and numbering is taken, the revised organization and numbering generally follows the guidance provided in Regulatory Guide 1.206 and the applicable SRP. As such, there are no significant departures from the expected organization and numbering of a typical FSAR, and the information is readily identifiable to facilitate NRC review.

In view of the above, it would be less efficient for both SNC and the NRC to comply with the portion of the regulation of 10 CFR Part 52, Appendix D, Section IV.A.2.a, that requires strict adherence to the “same organization and numbering as the generic DCD for the AP1000 design.” Accordingly, SNC hereby submits a request for an exemption from the regulations of 10 CFR 52, Appendix D, Section IV.A.2.a, pursuant to 10 CFR 52.7, “Specific exemptions,” and 10 CFR 52.93, “Exemptions and variances.”

Granting this request, which is authorized by law, would facilitate the NRC review of the VEGP COL application. For this and other reasons, granting this exemption request will not present an undue risk to the public health and safety, and is consistent with the common defense and security.

Moreover, compliance with the current rule would cause undue hardship for SNC and would also be inefficient and burdensome for the NRC staff. That approach would require SNC to prepare, and the NRC to review, information with an organization and numbering that is unfamiliar and inconsistent with the current guidance for format and content of a COL application.

Additionally, compliance with Appendix D, Section IV.A.2.a is not necessary to achieve its underlying purpose. Most of the FSAR conforms to the organization and numbering of the referenced DCD. The exceptions are limited and do not lead to confusion regarding the incorporation of the DCD into the FSAR.

For these reasons, SNC requests approval of the requested exemption from current regulations of 10 CFR 52, Appendix D, Section IV.A.2.a, as identified herein and in the application departures report.

**Vogle Electric Generating Plant, Units 3 & 4  
COL Application  
Part 7 — Departures, Exemptions, and Variances**

**C. VEGP Variances**

SNC requests the following variances in the VEGP COLA FSAR from the VEGP ESPA SSAR:

<u>ESP Variance Number</u>	<u>Description</u>
VEGP VAR 1.6-1	Variance from SSAR Section 1.6: Material Incorporated by Reference
VEGP VAR 1.6-2	Variance from SSAR Section 3.8.5: Foundations
VEGP VAR 1.6-3	Variance from SSAR Chapter 15: Accident Analyses

These requested variances are made pursuant to 10 CFR 52.93. A summary and justification for each of these are provided below.

Variance Number: VEGP VAR 1.6-1

Summary of Variance:

**ESPA SSAR Section 1.6**, Material Incorporated by Reference, is not incorporated by reference into the COLA FSAR.

Justification for Variance:

**Section 1.6** of the ESPA SSAR contains a reference to Revision 15 of the AP1000 DCD and additional Westinghouse technical reports. This information has been superseded by Revision 16 of the AP1000 DCD, Section 1.6, which is incorporated by reference into the VEGP COLA FSAR. Revision 16 of the AP1000 DCD contains the most updated information and is currently under review by the NRC. Therefore, a variance is required to not incorporate **Section 1.6** of the ESPA SSAR because it contains superseded information. The VEGP COLA incorporates by reference the updated information from Section 1.6 of DCD Revision 16.

Variance Number: VEGP VAR 1.6-2

Summary of Variance:

The first two paragraphs of **ESPA SSAR Section 3.8.5**, Foundations, are not incorporated by reference into the COLA FSAR.

**Vogtle Electric Generating Plant, Units 3 & 4**  
**COL Application**  
**Part 7 — Departures, Exemptions, and Variances**

Justification for Variance:

The first two paragraphs of **Section 3.8.5** of the ESPA SSAR contain a reference to Revision 15 of the AP1000 DCD and additional Westinghouse technical reports. This information has been superseded by Section 3.8.5 of the AP1000 DCD, Revision 16, which is incorporated by reference into the VEGP COLA FSAR. Revision 16 of the AP1000 DCD contains the most updated information and is currently under review by the NRC. Therefore, a variance is required to not incorporate the first two paragraphs of **ESPA SSAR Section 3.8.5**. The VEGP COLA incorporates by reference the updated information from Section 3.8.5 of DCD Revision 16.

Variance Number: VEGP VAR 1.6-3

Summary of Variance:

**ESPA SSAR Chapter 15**, Accident Analyses, is not incorporated by reference into the COLA FSAR.

Justification for Variance:

**Chapter 15** of the ESPA SSAR contains accident release information based upon Revision 15 of the AP1000 DCD. This information has been superseded by the associated section of Revision 16 of the AP1000 DCD, which is incorporated by reference into the VEGP COLA FSAR. Revision 16 of the AP1000 DCD contains the most updated information and is currently under review by the NRC. Therefore, a variance is required to not incorporate by reference **ESPA SSAR Chapter 15**.