

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

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**VEGP Proposed License Conditions**

**1. ITAAC (Inspections, Tests, Analyses, and Acceptance Criteria):**

There are several ITAAC identified in the COLA. Once incorporated into the COL, the regulations identify the requirements that must be met.

**PROPOSED LICENSE CONDITION:**

The ITAAC identified in the tables in Appendix B are hereby incorporated into this Combined License. After the Commission has made the finding required by 10 CFR 52.103(g), the ITAAC do not constitute regulatory requirements; except for specific ITAAC, which are the subject of a Section 103(a) hearing, their expiration will occur upon final Commission action in such proceeding.

**2. COL HOLDER ITEMS:**

There are several COL information items that can not be resolved prior to issuance of the Combined License. The referenced AP1000 design certification has already justified why each COL Holder item (as identified in the AP1000 DCD Tier 2 Table 1.8-2) can not be resolved before the COL is issued, provides sufficient information on these items to support the NRC licensing decision, and identifies an appropriate implementation milestone. Each COL information item that cannot be resolved completely before the COL is issued is also identified as a COL Holder item in the COLA FSAR Table 1.8-202. Therefore, in accordance with the guidance in Regulatory Guide 1.206, section C.III.4.3, the following License Condition is proposed to address these COL Holder items. Holder items (per DCD Table 1.8-2) that are addressed by the COLA are not included in the proposed condition. These include COL information item numbers 3.11-1, 9.5-6, and 10.1-1.

**PROPOSED LICENSE CONDITION:**

Each COL Holder item identified below shall be completed by the identified implementation milestone through completion of the action therein identified.

SUMMARY OF COMBINED LICENSE INFORMATION HOLDER ITEMS			
COL Item No.	Subject	From DCD Tier 2 Subsection	Implementation Milestone
3.6-1	Pipe Break Hazards Analysis	3.6.4.1	Prior to initial fuel load
<p>After a Combined License is issued, the following activity will be completed by the COL holder:</p> <ol style="list-style-type: none"> <li>1) Combined License holders referencing the AP1000 design will complete the pipe whip restraint design and complete an as-designed pipe break hazards analysis in accordance with the criteria outlined in subsections 3.6.1.3.2 and 3.6.2.5. The as-designed pipe rupture hazard analysis including break locations based on as-designed pipe analysis will be documented in an as-designed Pipe Rupture Hazards Analysis Report.</li> <li>2) A pipe rupture hazard analysis is part of the piping design. It is used to identify postulated break locations and layout changes, support design, whip restraint design, and jet shield design. The final design for these activities will be completed prior to fabrication and</li> </ol>			

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COL Item No.	Subject	From DCD Tier 2 Subsection	Implementation Milestone
installation of the piping and connected components. The as-built reconciliation of the pipe break hazards analysis in accordance with the criteria outlined in subsections 3.6.1.3.2 and 3.6.2.5 will be completed prior to fuel load.			
3.7-3	Seismic Interaction Review	3.7.5.3	Prior to initial fuel load
The seismic interaction review will be updated by the Combined License holder for as-built information. This review is performed in parallel with the seismic margin evaluation. The review is based on as-procured data, as well as the as-constructed condition. The as-built seismic interaction review is not provided with the COL application, but is completed prior to fuel load.			
3.7-4	Reconciliation of Seismic Analyses of Nuclear Island Structures	3.7.5.4	Prior to initial fuel load
The Combined License holder will reconcile the seismic analyses described in subsection 3.7.2 for detail design changes, such as those due to as-procured or as-built changes in component mass, center of gravity, and support configuration based on as-procured equipment information. Deviations are acceptable based on an evaluation consistent with the methods and procedure of Section 3.7 provided the amplitude of the seismic floor response spectra, including the effect due to these deviations, does not exceed the design basis floor response spectra by more than 10 percent. The Combined License holder will complete this reconciliation prior to fuel load.			
3.9-2	Design Specification and Reports	3.9.8.2	Prior to initial fuel load
After a Combined License is issued, the following activities are completed by the COL holder:			
<ol style="list-style-type: none"> <li>1) A Combined License holder referencing the AP1000 design will have available for NRC audit the design specifications and as-designed design reports prepared for major ASME Section III components and ASME Code, Section III piping.</li> <li>2) A Combined License holder referencing the AP1000 design will have available for NRC audit the design specifications prepared for ASME Section III auxiliary components and valves.</li> <li>3) Reconciliation of the as-built piping (verification of the thermal cycling and stratification loading considered in the stress analysis discussed in subsection 3.9.3.1.2) is completed by the COL holder after the construction of the piping systems and prior to fuel load.</li> </ol>			
4.4-2	Confirm Assumptions for Safety Analyses DNBR Limits	4.4.7	Prior to initial fuel load
Combined License applicants referencing the AP1000 certified design will address changes			

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COL Item No.	Subject	From DCD Tier 2 Subsection	Implementation Milestone
<p>to the reference design of the fuel, burnable absorber rods, rod cluster control assemblies, or initial core design from that presented in the DCD.</p> <p>Following selection of the actual plant operating instrumentation and calculation of the instrumentation uncertainties of the operating plant parameters as discussed in subsection 7.1.6, Combined License applicants will calculate the design limit DNBR values using the RDTP with these instrumentation uncertainties and confirm that either the design limit DNBR values as described in Section 4.4 remain valid, or that the safety analysis minimum DNBR bounds the new design limit DNBR values plus DNBR penalties, such as rod bow penalty.</p>			
5.3-1	Reactor Vessel Pressure – Temperature Limit Curves	5.3.6.1	Prior to initial fuel load
<p>The pressure-temp. curves shown in Figures 5.3-2 and 5.3-3 are generic curves for AP1000 reactor vessel design, and they are the limiting curves based on copper and nickel material composition. However, for a specific AP1000, these curves will be plotted based on material composition of copper and nickel. Use of plant-specific curves will be addressed by the Combined License holder during procurement and fabrication of the reactor vessel. As noted in the bases to Technical Specification 3.4.14, use of plant-specific curves requires evaluation of the LTOP system. This includes an evaluation of the setpoint pressure for the RNS relief valve by the Combined License holder to determine if the setpoint pressure needs to be changed based on the plant-specific pressure-temperature curves. The development of the plant-specific curves and evaluation of the setpoint pressure are required prior to fuel load.</p>			
5.3-4	Reactor Vessel Materials Properties Verification	5.3.6.4.1	Prior to initial fuel load
<p>The Combined License holder will complete prior to fuel load verification of plant-specific belt line material properties consistent with the requirements in subsection 5.3.3.1 and Tables 5.3-1 and 5.3-3. The verification will include a pressurized thermal shock evaluation based on as-procured reactor vessel material data and the projected neutron fluence for the plant design objective of 60 years. This evaluation report will be submitted for NRC staff review.</p>			
6.3-2	Verification of Water Sources for Long-Term Recirculation Cooling Following a LOCA	6.3.8.2	Prior to initial fuel load
<p>After a Combined License is issued, the following activities are completed by the COL holder: The combined license holder referencing the AP1000 design will provide an assessment of the acceptability of the screen performance by performing testing and analysis of the screens. Downstream effects will be assessed to confirm the coolability of the core.</p>			
10.2-1	Turbine Maintenance and Inspection	10.2.6	Prior to initial fuel load
<p>The Combined License holder will submit to the NRC staff for review prior to fuel load, and then implement a turbine maintenance and inspection program. The program will be</p>			

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consistent with the maintenance and inspection program plan activities and inspection intervals identified in subsection 10.2.3.6. The Combined License holder will have available plant-specific turbine rotor test data and calculated toughness curves that support the material property assumptions in the turbine rotor analysis after the fabrication of the turbine and prior to fuel load.			
14.4-2	Test Specifics and Procedures	14.4.2	Prior to initial fuel load
NOTE –addressed by proposed License Condition #6.			
14.4-4	Review and Evaluation of Test Results	14.4.4	Prior to initial fuel load
The Combined License holder is responsible for review and evaluation of individual test results as well as final review of overall test results and for review of selected milestones or hold points within the test phases. Test exceptions or results which do not meet acceptance criteria are identified to the affected and responsible design organizations, and corrective actions and retests, as required, are performed.			
14.4-6	First-Plant-Only and Three-Plant-Only Tests	14.4.6	Prior to initial fuel load
The COL holder for the first plant and the first three plants will perform the tests listed in subsection 14.2.5. For subsequent plants, either tests listed in subsection 14.2.5 shall be performed, or the COL applicant shall provide a justification that the results of the first-plant-only tests or first-three-plant tests are applicable to the subsequent plant. The Combined License holder will perform the tests or provide the information defined above prior to fuel load.			
19.59.10-1	As-Built SSC HCLPF Comparison to Seismic Margin Evaluation	19.59.10.5	Prior to initial fuel load
<p>The Combined License holder referencing the AP1000 certified design will review differences between the as-built plant and the design used as the basis for the AP1000 seismic margins analysis prior to fuel load. A verification walkdown will be performed with the purpose of identifying differences between the as-built plant and the design. Any differences will be evaluated to determine if there is a significant adverse effect on the seismic margins analysis results. Spacial interactions are addressed by COL information item 3.7-3. Details of the process will be developed by the Combined License holder.</p> <p>The Combined License holder referencing the AP1000 certified design should compare the as-built SSC HCLPFs to those assumed in the AP1000 seismic margin evaluation prior to fuel load. Deviations from the HCLPF values or assumptions in the seismic margin evaluation due to the as-built configuration and final analysis should be evaluated to determine if vulnerabilities have been introduced. The requirements to which the equipment is to be purchased are included in the equipment specifications. Specifically, the equipment specifications include:</p>			

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COL Item No.	Subject	From DCD Tier 2 Subsection	Implementation Milestone
<p>1. Specific minimum seismic requirements consistent with those used to define the Table 19.55-1 HCLPF values. This includes the known frequency range used to define the HCLPF by comparing the required response spectrum (RRS) and test response spectrum (TRS). The range of frequency response that is required for the equipment with its structural support is defined.</p> <p>2. Hardware enhancements that were determined in previous test programs and/or analysis programs will be implemented.</p>			
19.59.10-2	Evaluation of As-Built Plant Versus Design in AP1000 PRA and Site-Specific PRA External Events	19.59.10.5	Prior to initial fuel load
<p>The Combined License holder referencing the AP1000 certified design will review differences between the as-built plant and the design used as the basis for the AP1000 PRA and Table 19.59-18 prior to fuel load. If the effects of the differences are shown, by a screening analysis, to potentially result in a significant increase in core damage frequency or large release frequency, the PRA will be updated to reflect these differences.</p>			
19.59.10-3	Internal Fire and Internal Flood Analyses	19.59.10.5	Prior to initial fuel load
<p>The Combined License holder referencing the AP1000 certified design will review differences between the as-built plant and the design used as the basis for the AP1000 internal fire and internal flood analysis prior to fuel load. Differences will be evaluated to determine if there is significant adverse effect on the internal fire and internal flood analysis results.</p>			
19.59.10-5	Equipment Survivability	19.59.10.5	Prior to initial fuel load
<p>The Combined License holder referencing the AP1000 certified design will perform a thermal lag assessment of the as-built equipment required to mitigate severe accidents (hydrogen igniters and containment penetrations) to provide additional assurance that this equipment can perform its severe accident functions during environmental conditions resulting from hydrogen burns associated with severe accidents. This assessment is performed prior to fuel load and is required only for equipment used for severe accident mitigation that has not been tested at severe accident conditions. The Combined License holder will assess the ability of the as-built equipment to perform during severe accident hydrogen burns using the Environment Enveloping method or the Test Based Thermal Analysis method discussed in EPRI NP-4354.</p>			

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**3. OPERATIONAL PROGRAM IMPLEMENTATION:**

The provisions of the regulations address implementation milestones for some operational programs. The NRC will use license conditions to ensure implementation for those operational programs whose implementation is not addressed in the regulations. COLA FSAR Subsection 13.4, Table 13.4-201, identifies several programs required by regulations that must be implemented by a milestone to be identified in a license condition.

**PROPOSED LICENSE CONDITION:**

The licensee shall implement the programs or portions of programs identified in Table 13.4-201 on or before the associated milestones in Table 13.4-201.

- A. Construction Initiation – The licensee shall implement each operational program identified below prior to initiating construction of nuclear safety or security related structures, systems, or components.
  - A.1 – Fitness for Duty (Construction)
- B. 18 Months Prior to Fuel Load – The licensee shall implement each operational program identified below at least 18 months prior to scheduled date of initial fuel load.
  - B.1 – Reactor Operator Training
- C. Receipt of Materials – The licensee shall implement each operational program identified below prior to initial receipt of byproduct, source, or special nuclear materials onsite (excluding Exempt Quantities as described in 10 CFR 30.18).
  - C.1 – Radiation Protection (applicable portions)
- D. Fuel Receipt – The licensee shall implement each operational program identified below prior to initial receipt of fuel onsite.
  - D.1 – Fire Protection (applicable portions)
  - D.2 – Radiation Protection (applicable portions)
  - D.3 – Security Program (applicable portions)
- E. Construction Testing – The licensee shall implement each operational program identified below prior to initial construction testing.
  - E.1 – Initial Test Program – Construction Testing
- F. Preoperational Testing – The licensee shall implement each operational program identified below prior to initial preoperational testing.
  - F.1 – Initial Test Program – Preoperational Testing
- G. Fuel Loading – The licensee shall implement each operational program identified below prior to initial fuel load.
  - G.1 – Environmental Qualification
  - G.2 – Pre-Service Testing
  - G.3 – Process and Effluent Monitoring and Sampling
  - G.4 – Radiation Protection (applicable portions)
  - G.5 – Motor-Operated Valve Testing
  - G.6 – Fire Protection
  - G.7 – Fitness for Duty (Operations)



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- H. Startup Testing – The licensee shall implement each operational program identified below prior to initial startup testing
  - H.1 – Initial Test Program – Startup Testing
- I. MODE 4 – The licensee shall implement each operational program identified below prior to MODE 4 operation.
  - I.1 – Containment Leakage Rate Testing Program
- J. Initial Criticality – The licensee shall implement each operational program identified below prior to initial criticality.
  - J.1 – Reactor Vessel Material Surveillance
- K. Waste Shipment – The licensee shall implement each operational program identified below prior to initial radioactive waste shipment.
  - K.1 – Radiation Protection

**4. FIRE PROTECTION PROGRAM REVISIONS:**

An implementation license condition approved in the SRM regarding SECY-05-0197 applies to the fire protection program.

**PROPOSED LICENSE CONDITION:**

The licensee shall maintain in effect the provisions of the fire protection program as described in the Final Safety Analysis Report for the facility. The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

**5. SECURITY PROGRAM REVISIONS:**

An implementation license condition approved in the SRM regarding SECY-05-0197 applies to the security program.

**PROPOSED LICENSE CONDITION:**

The licensee shall maintain in effect the provisions of the physical security plan, security personnel training and qualification plan, and safeguards contingency plan, and all amendments made pursuant to the authority of 10 CFR 50.90, 50.54(p), 52.97, and Section VIII of Appendix D to Part 52 when nuclear fuel is onsite, and continuing until all nuclear fuel is permanently removed from the site.

**6. OPERATIONAL PROGRAM READINESS:**

The NRC inspection of operational programs will be the subject of the following license condition in accordance with SECY-05-0197.

**PROPOSED LICENSE CONDITION:**

The licensee shall submit to the appropriate Director of the NRC, a schedule, no later than 12 months after issuance of the COL, that supports planning for and conduct of NRC inspections of operational programs listed in the operational program FSAR Table 13.4-201. The schedule shall be updated every 6 months until 12 months before scheduled fuel loading, and every month thereafter until either the operational programs in the FSAR table have been fully implemented or the plant has been placed in commercial service, whichever comes first.

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**7. VENDOR AE CONSTRUCTOR QUALIFICATIONS:**

COLA FSAR Subsection 1.4.1 indicates that the applicant has not yet identified some of the major participants in the construction of the power plant. Thus, the technical qualifications of the NSSS vendor, architect-engineer, and constructor, and the division of responsibility among them could not be reviewed.

**PROPOSED LICENSE CONDITION:**

Prior to commencement of construction, the licensee shall submit a license amendment request that 1) identifies the NSSS vendor, architect-engineer, and constructor; 2) describes their technical qualifications; and 3) describes the division of responsibility among them.

**8. STARTUP TESTING:**

COLA FSAR Section 14.2 specifies certain startup tests that must be completed after fuel load. Operating licenses typically have included the following condition related to startup testing.

**PROPOSED LICENSE CONDITION:**

Any changes to the Initial Startup Test Program described in Chapter 14 of the FSAR made in accordance with the provisions of 10 CFR 50.59 or Section VIII of Appendix D to 10 CFR Part 52 shall be reported in accordance with 50.59(d) within one month of such change.

**9. GENERIC TECHNICAL SPECIFICATION AND COMPLETION:**

The GTS contain several bracketed values and Reviewer's notes requiring plant specific values that can not be determined until after the COL is issued.

**PROPOSED LICENSE CONDITION:**

The licensee shall submit license amendments to address the remaining bracketed values as identified below.

- A. GTS 3.1.4 The licensee shall submit a license amendment application following determination of the plant specific rod drop time limit to replace the bracketed value in Surveillance Requirement (SR) 3.1.4.3.
- B.1. GTS 3.3.1 The licensee shall submit a license amendment application following selection of the plant specific instrumentation and completion of a plant-specific setpoint study to replace any unconfirmed values in Table 3.3.1-1 and in Notes 1 and 2 and to remove the Reviewer Note.
- B.2. GTS 3.3.1 The licensee shall submit a license amendment application following the choice of instrumentation and determination of the data availability to support a plant-specific Required Action Completion Times and Surveillance Frequencies.
- C.1. GTS 3.3.2 The licensee shall submit a license amendment application following selection of the plant specific instrumentation and completion of a plant-specific setpoint study to replace any unconfirmed values in Table 3.3.2-1 and to remove the Reviewer Note.
- C.2. GTS 3.3.2 The licensee shall submit a license amendment application following the choice of instrumentation and determination of the data availability to support a plant specific Required Action Completion Times and Frequencies.

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- D. GTS 3.8.1 The licensee shall submit a license amendment application following completion of battery vendor selection and determination of the appropriate currents and charge times to replace the bracketed values in Required Actions A.2 and B.2 and in SR 3.8.1.2.
- E. GTS 3.8.7 The licensee shall submit a license amendment application following completion of battery vendor selection and determination of the appropriate currents to replace the bracketed values in Conditions B and F, Required Action B.2, and SR 3.8.7.1.
- F. GTS 5.5.8 The licensee shall submit a license amendment application following completion of air lock vendor selection and determination of the appropriate leakage limits to replace the bracketed values in Administrative Control 5.5.8.

**10. ENVIRONMENTAL PROTECTION PLAN:**

Operating licenses typically have included the following condition related to environmental testing.

**PROPOSED LICENSE CONDITION:**

The issuance of this COL, subject to the Environmental Protection Plan and the conditions for the protection of the environment set forth herein, is in accordance with the National Environmental Policy Act of 1969, as amended, and with applicable sections of 10 CFR Part 51, “Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions,” as referenced by Subpart C of 10 CFR Part 52, “Early Site Permits; Standard Design Certifications; and Combined Licenses for Nuclear Power Plants,” and all applicable requirements therein have been satisfied.

**Appendix A: Environmental Protection Plan (Nonradiological)**

**1.0 Objectives of the Environmental Protection Plan**

The purpose of the Environmental Protection Plan (EPP) is to provide for protection of nonradiological environmental resources during construction and operation of the nuclear facility. The principal objectives of the EPP are as follows:

- (1) Verify that the facility is operated in an environmentally acceptable manner, as established by the Final Environmental Impact Statement (FEIS) and other NRC environmental impact assessments.
- (2) Coordinate NRC requirements and maintain consistency with other Federal, State and local requirements for environmental protection.
- (3) Keep the NRC informed of the environmental effects of facility construction and operation and of actions taken to control those effects.

Environmental concerns identified in the FEIS which relate to water quality matters are regulated by way of the licensee's NPDES permit.

**2.0 Environmental Protection Issues**

In the FEIS for the Combined License (FES-COL) (NUREG xxxx) dated [month year], the staff considered the environmental impacts associated with the construction and operation of Vogtle Electric Generating Plant (VEGP) Units 3 and 4. Certain environmental issues were identified which required study or license conditions to resolve environmental concerns and to assure adequate protection of the environment.

**2.1 Aquatic Issues**

No specific nonradiological aquatic impact issues were identified by NRC staff in the FEIS.

**2.2 Terrestrial Issues**

No specific nonradiological terrestrial impact issues were identified by NRC staff in the FEIS.

**2.3 Issues Related to Maintenance of Transmission Line Corridors**

No specific nonradiological transmission line corridor impact issues were identified by NRC staff in the FEIS.

**2.4 Issues Related to Cultural Resources**

No specific nonradiological cultural resource impact issues were identified by NRC staff in the FEIS.

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2.5 Issues Related to Noise

No specific nonradiological noise impact issues were identified by NRC staff in the FEIS.

2.6 Other Issues

No other specific nonradiological issues were identified by NRC staff in the FEIS.

**3.0 Consistency Requirements**

3.1 Plant Design, Construction, and Operation Activities

The licensee may make changes in station design or operation or perform tests or experiments affecting the environment provided such activities do not involve an unreviewed environmental question and do not involve a change in the EPP\*. Changes in station design or operation or performance of tests or experiments which do not affect the environment are not subject to the requirements of this EPP. Activities governed by Section 3.3 are not subject to the requirements of this section.

Before engaging in additional construction or operational activities which may significantly affect the environment, the licensee shall prepare and record an environmental evaluation of such activity. Activities are excluded from this requirement if all measurable nonradiological environmental effects are confined to the on-site-areas previously disturbed during site preparation and plant construction. When the evaluation indicates that such activity involves an unreviewed environmental question, the licensee shall provide a written evaluation of such activity and obtain prior NRC approval. When such activity involves a change in the EPP, such activity and change to the EPP may be implemented only in accordance with an appropriate license amendment as set forth in Section 5.3 of this EPP.

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns: (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the FES-COL, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board (ASLB); or (2) a significant change in effluents or power level; or (3) a matter, not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include written evaluations which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question or constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0. The licensee shall include as part of the Annual Environmental Operating Report (per Subsection 5.4.1) brief descriptions, analyses, interpretations, and evaluations of such changes, tests and experiments.

\* This provision does not relieve the licensee of the requirements of 10 CFR 50.59.

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3.2 Reporting Related to the NPDES Permit and State Water Quality Certification

Changes to, or renewals of, the NPDES Permits or the State certification shall be reported to the NRC within 30 days following the date the change or renewal is approved. If a permit or certification, in part or in its entirety, is appealed and stayed, the NRC shall be notified within 30 days following the date the stay is granted.

The licensee shall notify the NRC of changes to the effective NPDES Permit proposed by the licensee by providing NRC with a copy of the proposed change at the same time it is submitted to the permitting agency. The licensee shall provide the NRC a copy of the application for renewal of the NPDES Permit at the same time the application is submitted to the permitting agency.

3.3 Changes Required for Compliance with Other Environmental Regulations

Changes in plant design or operation and performance of tests or experiments which are required to achieve compliance with other Federal, State, and local environmental regulations are not subject to the requirements of Section 3.1.

**4.0 Environmental Conditions**

4.1 Unusual or Important Environmental Events

Any occurrence of an unusual or important environmental event that indicates or could result in significant environmental impact causally related to plant construction or operation shall be recorded and reported to the NRC within 24 hours followed by a written report per subsection 5.4.2. The following are examples: excessive bird impaction events; onsite plant or animal disease outbreaks; mortality or unusual occurrence of any species protected by the Endangered Species Act; unusual fish kills or impingement events on intake screens; unusual increase in nuisance organisms or conditions; unanticipated or emergency discharge of wastewater or chemical substances; and damage to vegetation resulting from cooling tower operations.

No routine monitoring programs are required to implement this condition.

4.2 Environmental Monitoring

4.2.1 Aquatic Monitoring

The certifications and permits required under the Clean water Act provide mechanisms for protecting water quality and, indirectly, aquatic biota. The NRC will rely on the decision made by the State of Georgia under the authority of the Clean Water Act for any requirements for aquatic monitoring.

4.2.2 Terrestrial Monitoring

No specific nonradiological terrestrial monitoring requirements were identified by NRC staff in the FEIS.

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4.2.3 Maintenance of Transmission Line Corridors

No specific nonradiological transmission line corridor monitoring requirements were identified by NRC staff in the FEIS.

**5.0 Administrative Procedures**

5.1 Review and Audit

The licensee shall provide for review and audit of compliance with this EPP. The audits shall be conducted independently of the individual or groups responsible for performing the specific activity. A description of the organizational structure utilized to achieve the independent review and audit function and results of the audit activities shall be maintained and made available for inspection.

5.2 Records Retention

Records and logs relative to the environmental aspects of station construction and operation shall be made and retained in a manner convenient for review and inspection. These records and logs shall be made available to the NRC on request.

Record of modifications to station structures, systems, and components determine to potentially affect the continued protection of the environment shall be retained for the life of the station. All other records and logs relating to this EPP shall be retained for five years or, where applicable, in accordance with the requirements of other agencies.

5.3 Changes in the Environmental Protection Plan

Requests for changes in the EPP shall include an assessment of the environmental impact of the proposed change and a supporting justification. Implementation of such changes in the EPP shall not commence prior to NRC approval of the proposed changes in the form of a permit amendment incorporating the appropriate revision to the EPP.

5.4 Reporting Requirements

5.4.1 Routine Reports

An Annual Environmental Operating report describing the implementation of this EPP for the previous year shall be submitted to the NRC prior to May 1 of each year. The period of the first report shall begin with the date of issuance of the COL for Unit 3, and the initial report for Unit 4 shall be submitted prior to May 1 of the year following the beginning of Unit 4 operation.

The report shall include summaries of the environmental protection activities required by Subsection 4.2 of this EPP (if any) for the report period, including a comparison with related preoperational studies, operational controls (as appropriate), and previous nonradiological environmental monitoring reports, and an assessment of the observed impacts of plant operation on the environment. If harmful effects or evidence of trends toward irreversible damage to the environment are observed, the licensee shall provide a detailed analysis of the data and a proposed course of mitigating action.

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The Annual Environmental Monitoring report shall also include:

- (1) A list of EPP noncompliances and corrective actions taken to remedy them.
- (2) A list of all changes in station design, construction, or operation, tests and experiments made in accordance with Subsection 3.1 which involved a potentially significant unreviewed environmental question.
- (3) A list of nonroutine reports submitted in accordance with Subsection 5.4.2.

In the event that some results are not available by the report date, the report shall be submitted noting and explaining the missing results. The missing results shall be submitted as soon as possible in a supplementary report.

#### 5.4.2 Nonroutine Reports

A written report shall be submitted to the NRC within 30 days of occurrence of a nonroutine event. The report shall: (a) describe, analyze, and evaluate the event, including extent and magnitude of the impact, and plant operating characteristics; (b) describe the probable cause of the event; (c) indicate the action taken to correct the reported event; (d) indicate the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems; and, (e) indicate the agencies notified and their preliminary responses.

Events reportable under this subsection which also require reports to other Federal, State, or local agencies shall be reported in accordance with those reporting requirements in lieu of the requirements of this subsection. The NRC shall be provided with a copy of such a report at the time it is submitted to the other agency.



## **Appendix B. Inspections, Tests, Analyses and Acceptance Criteria**

### AP1000 DCD Tier 1 ITAAC

The Tier 1 information (including the ITAAC) of the referenced DCD is incorporated by reference.

### Physical Security Hardware ITAAC

The physical security related ITAAC are included in the referenced DCD Tier 1 Subsection 2.6.9 as incorporated by reference above.

### Site Specific ITAAC

The following information supplements the information provided in the referenced DCD Tier 1 Section 2.3:

2.3.30 Storm Drain System  
No entry for this system.

2.3.31 Raw Water System  
No entry for this system.

The following information supplements the information provided in the referenced DCD Tier 1 Section 2.5:

2.5.11 Meteorological and Environmental Monitoring System  
No entry for this system.

2.5.12 Closed Circuit TV System  
No Entry for this system.

The following information supplements the information provided in the referenced DCD Tier 1 Section 2.6:

2.6.12 Transmission Switchyard and Offsite Power System  
No entry for this system.

The following non-system based site specific ITAAC are provided:

#### Safety-Related Backfill

The ITAAC identified in ESPA SSAR Subsection 2.5.4.5.5 are incorporated by reference.

#### Waterproof Membrane

The ITAAC identified in ESPA SSAR Subsection 3.8.5 is incorporated by reference.

### Emergency Planning ITAAC

The emergency planning ITAAC included in Annex V2 of Part 5, Emergency Planning, of the referenced ESPA is incorporated by reference.