

PMVogleCOLPEm Resource

From: Joshi, Ravindra
Sent: Tuesday, June 30, 2009 1:11 PM
To: VogleCOL Resource
Subject: FW: SNC Letter ND-09-0806 transmitting VEGP Units 3 and 4 COLA Supplemental Response to RAI Letter No. 029
Attachments: ND-09-0806 RAI Ltr #29 Supp_Full Copy.pdf

From: Williams, Dana M. [mailto:DANAWILL@SOUTHERNCO.COM]
Sent: Thursday, June 18, 2009 3:54 PM
To: Joshi, Ravindra; Hughes, Brian; Simms, Tanya; Anderson, Brian; Comar, Manny; Notich, Mark; Fringer, John; Cain, Loyd
Subject: SNC Letter ND-09-0806 transmitting VEGP Units 3 and 4 COLA Supplemental Response to RAI Letter No. 029

An electronic copy of Southern Nuclear's letter, ND-09-0806, dated June 18, 2009 is attached. In addition, a hard copy has been transmitted to the NRC Document Control desk via FedEx.

Thank you,

Dana M. Williams

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JUN 18 2009

Docket Nos.: 52-025
52-026

ND-09-0806

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

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4 Combined License Application
Supplemental Response to Request for Additional Information Letter No. 029

Ladies and Gentlemen:

By letter dated March 28, 2008, Southern Nuclear Operating Company (SNC) submitted an application for combined licenses (COLs) for proposed Vogtle Electric Generating Plant (VEGP) Units 3 and 4 to the U.S. Nuclear Regulatory Commission (NRC) for two Westinghouse AP1000 reactor plants, in accordance with 10 CFR Part 52. During the NRC's detailed review of this application, the NRC identified a need for additional emergency planning information required to complete their review of the COL application's Final Safety Analysis Report (FSAR) Section 13.3, "Emergency Planning." By letter dated March 6, 2009, the NRC provided SNC with Request for Additional Information (RAI) Letter No. 029 concerning this information need. This RAI letter contained four RAI questions numbered 13.03-1 through 13.03-4. By letter dated April 3, 2009, SNC provided a response to these RAIs. However, based on a teleconference call with the NRC on May 13, 2009, SNC is supplementing its response to these RAIs to provide a revised Proposed License Condition. In addition, SNC is also providing a clearer site plan figure in the supplemental response. The enclosures to this letter provide SNC's supplemental response to these RAIs. The application revisions indicated in the responses have been incorporated in the COL application update submitted on May 22, 2009. For clarity, the entire response is included with the supplemental information added.

If you have any questions regarding this letter, please contact Mr. Wes Sparkman at (205) 992-5061.

Mr. J. A. (Buzz) Miller states he is an Executive Vice President of Southern Nuclear Operating Company, 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



Joseph A. (Buzz) Miller

Sworn to and subscribed before me this 18th day of June, 2009

Notary Public: Dana M. Williams

My commission expires: 12/29/2010

JAM/BJS/dmw

Enclosures:

1. Supplemental Response to NRC RAI Letter No. 029 on the VEGP Units 3 and 4 COL Application Involving Emergency Planning
2. Revised Site Plan Figure (on Compact Disc)

cc: Southern Nuclear Operating Company

Mr. J. H. Miller, III, President and CEO (w/o enclosures)
Mr. J. T. Gasser, Executive Vice President, Nuclear Operations (w/o enclosures)
Mr. D. H. Jones, Site Vice President – Vogtle 3 and 4 (w/o enclosures)
Mr. T. E. Tynan, Vice President - Vogtle (w/o enclosures)
Mr. M. K. Smith, Technical Support Director
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Mr. C. R. Pierce, Vogtle Development Licensing Manager
Mr. M. J. Ajluni, Nuclear Licensing Manager
Mr. W. A. Sparkman, COL Project Engineer
Document Services RTYPE: AR01.1053
File AR.01.02.06

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Mr. J. L. Whiteman, Principal Engineer, Licensing & Customer Interface

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Mr. R. J. Grumbir
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Mr. N. Haggerty
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Southern Nuclear Operating Company

ND-09-0806

Enclosure 1

Supplemental Response to NRC RAI Letter No. 029

on the

VEGP Units 3 and 4 COL Application

Involving

Emergency Planning

FSAR Section 13.3, Emergency Planning

eRAI Tracking No. 2087

NRC RAI Number 13.03-1:

[Basis: 10 CFR 52.79(a)(21), 10 CFR 52.79(b)(8), Section IV.E of Appendix E to 10 CFR Part 50]

COLA Application (COLA) Part 7, "Departures, Exemptions, and Variances," Revision 0, states in Section A, "STD and VEGP Departures" (page 1), that "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)." ESPA Part 5, "Emergency Plan" (Revision 4, March 2008, page H-1), states (in part) in Section H.1.1, "Technical Support Center (TSC)," that "[t]he TSC will be located in the lower level of an administration building sited between the Unit 2 and 3 power blocks within the VEGP Site protected area as shown on Figure ii." Figure ii, "Vogtle Electric Generating Plant Site Plan," is provided on page x of Part 5.

Figure ii, which shows the entire VEGP site on a very small figure, does not allow the identification of the TSC's specific location in regard to other significant site features. Figure 13.3-2, "VEGP Site Map," in the Vogtle ESP application (Part 2, Revision 0, August 2006, page 13.3-12) is somewhat clearer, yet also does not show the TSC's detailed location in relation to other major site structures and security boundaries.

Please provide a readable figure(s) (and description, if appropriate) that clearly shows the proposed TSC location in relation to the site's significant features and structures, including Units 1 through 4 power blocks, and major security barriers/boundaries and checkpoints. In addition, provide the TSC's approximate distance (in feet/meters) from the site's vital areas.

SNC Response:

The location of the TSC is shown on the revised "Vogtle Electric Generating Plant Site Plan" (see Enclosure 2), which will be provided as a replacement Emergency Plan Figure ii in a future COLA revision. The TSC will be located in the lower level of the Communication Support Center. The Communication Support Center is located adjacent to the Maintenance Building and near the Engineering and Administration Building. This complex of buildings is located within the Protected Area between the Unit 2 and Unit 3 power blocks. Please note that the grid lines on the revised figure are at 1000 ft. intervals. The distance from the TSC to the Unit 4 control room is about 1700 ft., and the distance to the Unit 3 control room is about 1000 ft. It is estimated that the walking distance from the TSC to the Unit 4 control room will be about 2500 ft. and 1800 ft. to the Unit 3 control room. A delay fence is located between the TSC and the Units 3 and 4 power blocks. Entrance through the delay fence will be through a card keyed gate. Motorized vehicles will be available for transport of personnel between the TSC and Units 3 and 4 vital areas.

Associated VEGP COL Application Revisions:

The following changes will be made in a future revision to the VEGP Units 3 and 4 COLA:

- Revise the first sentence of Part 5 of the COLA to read:

"Part 5 of the referenced ESP application is incorporated by reference with the following supplements."

- Add the following supplements after the first paragraph:

"Replace Preface page xiii, Figure ii, Vogtle Electric Generating Plant Site Plan, with the attached Preface Figure ii.

"Revise the second sentence of the first paragraph of Subsection V2H.1, Emergency Facilities, of Annex 2 of the ESP Emergency Plan to read:

'The OSCs are located in each unit's Control Support Area (CSA) which is adjacent to the passage from the annex building to the nuclear island control room.'

Add the following sentence to the end of the second paragraph of Subsection H.1.1, Technical Support Center (TSC) of the ESP Emergency Plan:

'Motorized vehicles are provided to facilitate the movement of personnel between the TSC and the Site's Control Rooms.'"

NRC RAI Number 13.03-2:

[Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(8), Section IV.E of Appendix E to 10 CFR Part 50]

VEGP DEP 18.8-1 (FSAR page 1.8-2) states in part that the Operations Support Center (OSC) location is as described in the Emergency Plan. Section V2 H.1, "Emergency Facilities," of ESP application Part 5, "Emergency Plan," states that "[t]he OSCs are located on the second floor of the Annex building adjacent to the Unit 3 and 4 Control Rooms." DCD Subsection 18.8.3.6 states that the OSC location is shown in (withheld) Figure 1.2-18, "Annex Building General Arrangement Plan at Elevation 100'-0" & 107'-2" (emphasis added). Further, COL application Part 7 Departure Number DEP 18.8-1 (page 9) states in part (under Departure Justification) the following:

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.

In AP1000 DCD Revision 16, the TSC has a (Tier 2*) location of the Control Support Area (CSA), which is identified in (withheld) Figure 1.2-19, "Annex Building General Arrangement Plan at Elevation 117'-6" & 126'-3" (emphasis added). Section 13.3 of NUREG-1793 identifies the OSC as located in Room 40318, and the TSC (CSA in DCD Revision 16) as located in Room 40403, adjacent to the passage from the annex building to the nuclear island control room.

Due to the elevation difference between the two figures (identified above for the OSC and TSC), the statement that the OSC is located in the CSA, and references both the OSC and TSC locations as being "adjacent" to the control room, the location of the OSC cannot be determined. For example, is the OSC location being moved from the second floor (100'-0"?) to the former

TSC location (i.e., the CSA) (117'-6"?), or will the OSC remain in a location below the CSA floor level?

Please clarify by describing the specific OSC location for both Units 3 and 4 (e.g., floor level and room number), including the location of the designated backup OSC space in the ALARA briefing room (described in Annex V2 of Part 5, Section V2H.1, "Emergency Facilities," page V2H-1).

SNC Response:

The OSC for Units 3 and 4 will be located in the respective Unit's Control Support Area (CSA) which is located in Room 40403 on Elevation 117' 6". Reference DCD Figure 1.2-19.

Associated VEGP COL Application Revisions:

See application revisions provided in the RAI 13.03-1 response.

NRC RAI Number 13.03-3:

[Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4), Section IV.B of Appendix E to 10 CFR Part 50]

COL application Part 2 (FSAR) Section 13.3.8, "ESP COL ACTION ITEMS," addresses emergency action levels (EALs) in relation to VEGP ESP COL 13.3-1 and 13.3-2. EALs are further discussed in Section D, "Emergency Classification System," of COL application Part 5.

The initial EALs, which are required by 10 CFR 50.47(b)(4) and Section IV.B of Appendix E to 10 CFR Part 50, must be approved by the NRC. The Vogtle combined license (COL) application does not fully address certain aspects of the required EAL scheme. This is because various equipment set points and other information cannot be determined until the as-built information is available; e.g., head corrections, radiation shine, final technical specifications, and equipment calculations and tolerances. The NRC has been evaluating possible options to ensure applicants address the regulations and provide the following:

Option 1 – Submit an entire EAL scheme, which contains all site-specific information, including set points. Until this information is finalized, EALs would remain an open item.

Option 2 – Submit emergency plan Section D, "Emergency Classification System," which addresses the four critical elements of an EAL scheme (listed below). The NRC will determine the acceptability of the EAL scheme.

- Critical Element 1 – Applicant proposes an overview of its emergency action level scheme including defining the four emergency classification levels (i.e., Notification of Unusual Event, Alert, Site Area Emergency, and General Emergency), as stated in NEI 99-01, Revision 5, with a general list of licensee actions at each emergency classification level.
- Critical Element 2 – Applicant proposes to develop the remainder of its EAL scheme by using a specified NRC endorsed guidance document. In the development of its EALs, the proposed EALs should be developed with few or no deviations or differences, other than those attributable to the specific reactor design. NEI 07-01, if endorsed, will be applicable to the AP1000 and ESBWR (passive) reactor designs,

and NEI 99-01 is applicable to all (non-passive) reactor designs. If applicable, EALs related to digital instrumentation and control must be included. The NRC must find in the Safety Evaluation Report that this approach is acceptable for each site.

- Critical Element 3 – Applicant proposes a License Condition (LC) that the applicant will create a fully developed set of EALs in accordance with the specified guidance document. These fully developed EALs must be submitted to the NRC for confirmation at least 180 days prior to fuel load.
- Critical Element 4 – The EALs must be kept in a document controlled by 10 CFR 50.54(q), such as the emergency plan; or a lower tier document, such as the Emergency Plan Implementing Procedures.

Please review the two options provided above, identify which option will be chosen, and provide the detailed EAL information in support of the chosen option. Please identify which option you intend to pursue.

SNC Response:

SNC commits to Option 2. SNC's approach to each of the Critical Elements discussed in the NRC's Request for Additional Information is described below:

Critical Element 1 – Emergency Plan Subsection D.1, Classification of Emergencies, provides an overview defining the four emergency classification levels: Notification of Unusual Event, Alert, Site Area Emergency, and General Emergency as defined in NEI 99-01, Rev. 5. Subsection D.1 also provides a general list of applicant actions at each emergency classification level.

Critical Element 2 – SNC will develop the remainder of the site-specific EAL scheme using the NRC-endorsed version of NEI 07-01, Rev. 0. The fully developed site-specific EAL scheme will be included in the Emergency Plan. Accordingly, the current EAL scheme will be removed from Annex V2, Section D of the Emergency Plan in a future revision of the COLA. In addition, Section D of the Emergency Plan will be revised to clarify the basis for the EAL scheme.

Critical Element 3 – SNC proposes the following License Condition related to the creation of a fully developed set of site-specific EALs in accordance with the guidance document discussed above:

PROPOSED LICENSE CONDITION:

“The licensee shall submit a fully developed set of site-specific Emergency Action Levels (EALs) to the NRC in accordance with the NRC-endorsed version of NEI 07-01, Revision 0. These fully developed EALs shall be submitted to the NRC for confirmation at least 180 days prior to initial fuel load.”

This license condition will be added to Part 10 of the COL Application, as described in the Application Revisions section for this response.

Critical Element 4 – As discussed in Critical Element 2, the fully developed site-specific EAL scheme will be incorporated into a future revision to the Emergency Plan. Accordingly, future changes to the EAL scheme will require an evaluation under 10 CFR 50.54(q) to determine if the changes will reduce the effectiveness of the Emergency Plan.

Associated VEGP COLA Application Revisions:

The following changes will be made in a future revision to the VEGP Units 3 and 4 COLA:

- Add the following supplements after the first paragraph of Part 5:

“Revise the last sentence of the fourth paragraph of page x of the Preface to read:

‘It is based on meeting the intent of the guidance contained in NUREG 0654, Revision 1 with the exception of emergency action levels which are based on Nuclear Energy Institute (NEI) 99-01, Revision 4, “Methodology for Development of Emergency Action Levels (EAL),” for Units 1 and 2. EALs for Units 3 and 4 will be based on the NRC endorsed version of NEI 07-01, Revision 0, Methodology for Development of Emergency Action Levels Advanced Passive Light Water Reactors.’

Revise the first sentence of the third paragraph of Subsection D.1 of the Base Plan to read:

‘The SNC classification scheme for Units 1 and 2 is based on Nuclear Energy Institute (NEI) 99-01, Revision 4, “Methodology for Development of Emergency Action Levels (EAL),” January 2003 endorsed by Regulatory Guide 1.101, Revision 4, Emergency Planning and Preparedness for Nuclear Power Reactors. The classification scheme for Units 3 and 4 will be based on the NRC endorsed version of NEI 07-01, Revision 0, Methodology for Development of Emergency Action Levels Advanced Passive Light Water Reactors.’

Revise the second sentence of the second paragraph of Preface page V2-vii of Annex V2 to read:

‘It is based on the guidance contained in NUREG 0654, Revision 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, with the exception of emergency action levels which will be based on the NRC endorsed version of Nuclear Energy Institute (NEI) Guideline NEI 07-01, Revision 0, Methodology for Development of Emergency Action Levels Advanced Passive Light Water Reactors, for Units 3 and 4.’

Revise Subsection V2D.2 of Annex V2 to read:

‘The Initiating Condition Matrix for Modes 1, 2, 3, and 4 for Units 3 and 4 will be shown in Table Annex V2 D-1, and the Initiating Condition Matrix for Modes 5, 6, and de-fueled will be shown in Table Annex V2 D-2.’

Add a Subsection V2D.3, Emergency Action Level Technical Basis, to page V2D-1 of Annex V2 which reads:

‘[Reserved for EAL Technical Basis]’

Delete the content of Tables V2D.2-1, Hot Initiating Conditions Matrix, Modes 1, 2, 3, and 4 and V2D.2-1, Cold Initiating Conditions Matrix, Modes 5, 6 and De-fueled, found on pages V2D-2 and 3, respectively, and replace with:

‘[Reserved for Initiating Condition Matrix]’

- In response to AP1000 R-COLA (BLN) RAI 09.05.01-01, the R-COL and S-COL Applicants have removed the License Condition associated with the fire protection program. Accordingly, COLA Part 10, Proposed License Conditions (Including ITAAC), Proposed License Condition 4, will be revised to read:

“4. Emergency Planning Actions:

Because various equipment set points and other information cannot be determined until as-built information is available, the COL Application does not fully address certain aspects of the EAL scheme. Thus, COL applicants using EAL schemes in accordance with NEI 07-01 are proposing the following license condition.

PROPOSED LICENSE CONDITION:

The licensee shall submit a fully developed set of site-specific Emergency Action Levels (EALs) to the NRC in accordance with the NRC-endorsed version of NEI 07-01, Revision 0. These fully developed EALs shall be submitted to the NRC for confirmation at least 180 days prior to initial fuel load.”

NRC RAI Number 13.03-4:

[Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4), 10 CFR 50.47(b)(8), Sections IV.B and IV.E of Appendix E to 10 CFR Part 50]

On November 12, 2008, the NRC issued the Advanced Safety Evaluation Report (SER) for the VEGP ESP application to Southern Nuclear Operating Company (SNC), and subsequently made the document publicly available. SER Section 13.3, “Emergency Planning” (ADAMS No. ML083150617), identifies seven VEGP ESP permit conditions (2 through 8, listed below), which address emergency planning in support of the proposed VEGP Units 3 and 4. (The NRC is currently reviewing the VEGP ESP application under docket number 52-011.)

As part of its review of the VEGP ESP application under docket number 52-011, on September 14, 2007, the NRC released a Safety Evaluation Report with Open Items (dated August 30, 2007) (ADAMS No. ML071970283). Section 13.3, “Emergency Planning,” of this document identified COL Action Items 13.3-1, 13.3-2 and 13.3-3, which addressed emergency action levels and technical support center (TSC) location. The three COL Action Items were rewritten as seven permit conditions in the Advanced SER.

Please describe the resolution of the VEGP ESP permit conditions, including how each permit condition is met, in relation to the COL application. (For example, permit condition 8 is addressed in [Tier 2*] VEGP DEP 18.8-1, supplemental information VEGP SUP 13.3-3, and VEGP ESP Unit 3 ITAAC 5.1.4; and permit conditions 2 through 7 are addressed in VEGP SUP 13.3-3, and VEGP ESP Units 3 and 4 ITAAC 1.1.2.) Provide any necessary revisions to the COL application to reflect the resolution of all permit conditions.

VEGP ESP Permit Conditions

2. An applicant for a combined license (COL) referencing this early site permit shall revise the EALs for Unit 3 to reflect the final revision of NEI 07-01.

3. An applicant for a combined license (COL) referencing this early site permit shall revise the EALs for Unit 4 to reflect the final revision of NEI 07-01.
4. An applicant for a combined license (COL) referencing this early site permit shall submit a fully developed EAL scheme for Unit 3 that reflects the completed AP1000 design details, subject to allowable ITAAC.
5. An applicant for a combined license (COL) referencing this early site permit shall submit a fully developed EAL scheme for Unit 4 that reflects the completed AP1000 design details, subject to allowable ITAAC.
6. An applicant for a combined license (COL) referencing this early site permit shall complete a fully developed set of EALs for Unit 3, which are based on in-plant conditions and instrumentation in addition to onsite and offsite monitoring, and which have been discussed and agreed on by the applicant or licensee and State and local governmental authorities, and approved by the NRC, and shall include the full set of EALs in the COL application. If the EALs are not fully developed, the COL application shall contain appropriate ITAAC for the fully developed set of EALs for Unit 3.
7. An applicant for a combined license (COL) referencing this early site permit shall complete a fully developed set of EALs for Unit 4, which are based on in-plant conditions and instrumentation in addition to onsite and offsite monitoring, and which have been discussed and agreed on by the applicant or licensee and State and local governmental authorities, and approved by the NRC, and shall include the full set of EALs in the COL application. If the EALs are not fully developed, the COL application shall contain appropriate ITAAC for the fully developed set of EALs for Unit 4.
8. An applicant for a combined license (COL) referencing this early site permit shall resolve the difference between the VEGP Units 3 and 4 common Technical Support Center (TSC), and the TSC location specified in the AP1000 certified design.

SNC Response to RAIs related to ESP Permit Conditions 2 through 7:

Subsequent to the preparation of the Vogtle ESP and VEGP Units 3 and 4 COL Applications, the NRC modified its regulatory position regarding the submission of EALs in support of COL Applications. The current regulatory position is outlined in RAI 13.3-3 above. SNC is committing to Option Two of the regulatory position. Accordingly, SNC will propose a license condition to address ESP Permit Conditions 2 through 7. A license condition for each unit is not necessary since the proposed license condition will be placed in the license for each unit.

Accordingly VEGP ESP COL Action Items will be revised to reflect that the action items have been converted to ESP Permit Conditions and are addressed as proposed license conditions in Part 10 of the COLA. Part 10 of the COLA will be revised in a future COLA revision.

Associated VEGP COLA Application Revisions:

The following changes will be made in a future revision to the VEGP Units 3 and 4 COLA:

- Revise FSAR Subsection 13.3.8 header to read:
“ESP Permit Conditions”

- Revise FSAR Subsection 13.3.8 COL Action Item VEGP ESP COL 13.3-1 and 13.3-2 to read:

VEGP ESP PC 2, 3,
4, 5, 6 & 7

“SNC will revise and submit the VEGP Units 3 and 4 Emergency Action Levels (EALs) in accordance with License Condition No. 4 identified in Part 10, Proposed License Conditions (Including ITAAC).”

SNC Response to RAI related to ESP Permit Condition 8:

Permit Condition 8 is addressed in FSAR Subsection 18.8.3.5 and Subsection 13.3.8 ESP COL Action Items as VEGP ESP COL 13.3-3. The ESP COL action item number will be re-labeled as VEGP ESP PC 8. These FSAR Subsections refer to the Emergency Plan for the location of the TSC. Section H, Emergency Facilities and Equipment, of the Emergency Plan describes the location of the TSC. The TSC is shown on Emergency Plan Figure ii. A revised site plan figure to replace Figure ii is included in Enclosure 2. The location of the TSC will be confirmed in EP ITAAC 5.1.4.

The TSC will be designed to meet the guidance contained in NUREG 0696, as described in the ESP Emergency Plan with the exception of being located within two minutes of the control room. The guidance contained in NUREG 0696 regarding the location of the TSC within a two minute walking distance from the control room was developed considering the available voice and data communication technology at the time the NUREG was developed (Immediately post TMI). Subsequent to the issuance of NUREG 0696, advances in voice and data communication systems have obviated the need for close proximity of the TSC and the Control Room(s). Advances in voice communication include: Dedicated circuits between the control room and the TSC and phone systems with the ability to use “bridge circuits” and “speaker phones” to conduct teleconferences. Advances in data communications include the installation of the Safety Parameter Display System (SPDS), which is contained in the Qualified Data Processing System (QDPS) for Units 3 and 4. A description of the QDPS is included in the Emergency Plan Annex V2 Subsection V2H.4.3, Process Monitoring.

To compensate for the estimated maximum walking time of 10 minutes between the TSC and the most distant control room (Unit 4), motorized vehicles will be available to expedite the transportation of personnel between the TSC and the site control rooms.

Associated VEGP COLA Application Revisions:

Future changes to the COL Application related to this response are described in the response to RAI 13.3-1 above, and below.

- Revise FSAR Subsection 13.3.8 COL Action Item VEGP ESP COL 13.3-3 to read:

VEGP ESP PC 8

“Location of the Technical Support Center (TSC) is described in the Emergency Plan.”

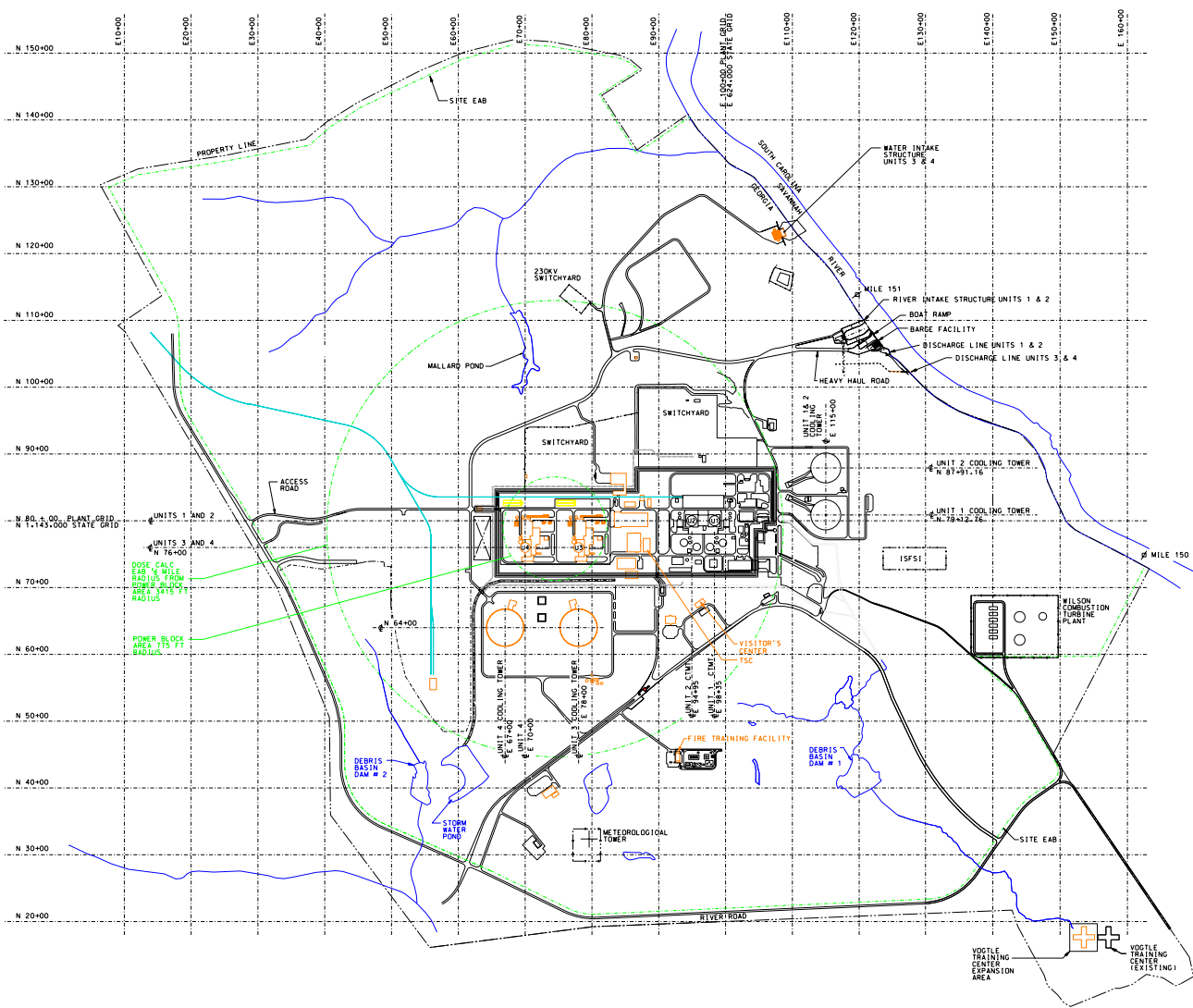
Southern Nuclear Operating Company

ND-09-0806

Enclosure 2

Revised Site Plan Figure

(on Compact Disc)



- GENERAL NOTES**
1. THE GRID SYSTEM SHOWN IS DESIGNATED "PLANT GRID SYSTEM". THE FOLLOWING FACTORS MAY BE APPLIED TO THE STATE GRID SYSTEM.
PLANT NORTH + 1135+000 = STATE NORTH
PLANT EAST + 614+000 = STATE EAST
 2. THE STATE PLANE COORDINATES SHOWN ARE BASED ON GEORGIA EAST (NAD83).
 3. NORMAL OPERATING CASESUS RELEASE FOR UNITS 3 & 4 FROM THE PLANT ARE ATTACHED TO THE SHIELD/CONTAINMENT BUILDING.

LEGEND:

— PROPERTY LINE
--- SITE EAB

