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Docket Nos.: 52-025  
52-026

ND-09-1529

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  
Response to Bellefonte Units 3 and 4 Safety Evaluation Report Confirmatory Item for  
Chapter 12

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. As a result of the NRC's detailed review of the initial AP1000 Reference COL application (Bellefonte Units 3 and 4), the NRC has written a safety evaluation report (SER) with open items for the subject chapter. While the open items for this chapter have been previously addressed, the Chapter 12 confirmatory item identified in the SER for the reference COL is addressed by the enclosures to this letter. VEGP is addressing the confirmatory items identified in the SER in Enclosure 1 to this letter as the new AP1000 Reference COL applicant. Enclosure 2 is provided to address inconsistencies between VEGP and Bellefonte STD-content that exist due to the initial submittals being based on different revision levels of the Nuclear Energy Institute Radiation Protection templates. It was not until after the initial VEGP COL application was submitted that the AP1000 Design Centered Working Group determined that conforming changes resulting from NEI template revisions would be based on the accepted template version.

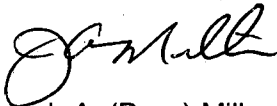
If you have any questions regarding this letter, please contact Mr. Wes Sparkman at (205) 992-5061.

D092  
NR0

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 16<sup>th</sup> day of October, 2009

Notary Public: Dana M. Williams

My commission expires: 12/29/2010



JAM/BJS/dmw

Enclosures:

1. Revisions to R-COLA related to SER with Open Items, Chapter 12
2. Plant-Specific Revisions to Align R-COLA STD-content related to Chapter 12

cc: Southern Nuclear Operating Company

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

Nuclear Regulatory Commission

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Mr. W. E. Cummins, Vice President of Regulatory Affairs and Standardization  
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Mr. S. A. Bradley, Vogtle Project Licensing Manager  
Mr. R. B. Sisk, Manager, AP1000 Licensing and Customer Interface  
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**Southern Nuclear Operating Company**

**ND-09-1529**

**Enclosure 1**

**Revisions to R-COLA related to SER with Open Items**

**Chapter 12**

**Confirmatory Item**

**CI 12.01-01**

**Revisions**

**See following pages**

**eRAI Tracking No. 0866 – 12.5-1**

**NuStart Qb Tracking No. 3524**

**NRC SER CI Number 12.01-01:**

The BLN FSAR states that COL information item, STD COL 12.1-1 is addressed in NEI 07-08, and Appendix 12AA of the BLN COL FSAR, which references NEI 07-03. The staff has reviewed the current version of NEI 07-03 and NEI 07-08 with respect to compliance with RG 1.8. The NEI 07-03 template states that the Radiation Protection Manager, Radiation Protection Technicians, and Radiation Protection Supervisory and Technical Staff will be trained and qualified in accordance with the guidance of RG 1.8. In a letter dated March 18, 2009 (ML090510379), the NRC accepted NEI 07-03, Revision 7. Specifically, the NRC staff indicated that for COL applications, NEI 07-03, Revision 7 provides an acceptable template for assuring that the RPP meets the applicable NRC regulations and guidance. Since the BLN COL FSAR has not yet adopted the approved version of the NEI template, this is identified as **Confirmatory Item 12.1-1**.

**SNC Response:**

By letter dated May 21, 2009, the Nuclear Energy Institute submitted to the NRC the accepted version of their report NEI 07-03A, Generic FSAR Template Guidance for Radiation Protection Program Description. The R-COLA will be revised in a future amendment to incorporate this accepted report as shown in the Application Revisions section below.

This response is expected to be STANDARD for the S-COLAs.

**Associated VEGP COL Application Revisions:**

1. COLA Part 2, FSAR Chapter 1, Table 1.6-201 as revised by TVA R-COLA letter dated May 11, 2009, Update of NEI 06-13 References, will be revised from:

Author / Report Number	Title	Revision	FSAR Section	Document Transmittal	ADAMS Accession Number
NEI 07-03	Generic FSAR Template Guidance for Radiation Protection Program Description	5	Appendix 12AA	March 2008	ML080860403
NEI 06-13A <sup>(b)</sup>	Template for an Industry Training Program Description	2	13.2	March 2009	ML090910554
NEI 07-02A <sup>(a)</sup>	Generic FSAR Template Guidance for Maintenance Rule Program Description for Plants Licensed Under 10 CFR Part 52	0	17.6	March 2008	ML080910149

**To read:**

Author / Report Number <sup>(a)</sup>	Title	Revision	FSAR Section	Document Transmittal	ADAMS Accession Number
NEI 07-03A	Generic FSAR Template Guidance for Radiation Protection Program Description	0	Appendix 12AA	May 2009	ML091490684
NEI 06-13A	Technical Report on a Template for an Industry Training Program Description	2	13.2	March 2009	ML090910554

NEI 07-02A      Generic FSAR Template Guidance      0      17.6      March 2008      ML080910149  
for Maintenance Rule Program  
Description for Plants Licensed  
Under 10 CFR Part 52

2. COLA Part 2, FSAR Chapter 1, Section 1.6, Table 1.6-201, footnote a) as revised by, and footnote b) as added by, TVA R-COLA letter dated May 11, 2009, Update of NEI 06-13 References, will be revised from:

- a) NEI 07-02A Revision 0 includes the approved Revision 3 template, the NRC safety evaluation, and corresponding responses to the NRC Request for Additional Information. Only the approved template is incorporated by reference. The rest of the document is referenced but not incorporated into the FSAR.
- b) NEI 06-13A Revision 2 includes the approved Revision 1 template, the NRC safety evaluation, and corresponding responses to the NRC Request for Additional Information. Only the approved template is incorporated by reference. The rest of the document is referenced but not incorporated into the FSAR.

To read (Note that footnote b) is entirely deleted):

- a) The NRC-accepted NEI documents identified by the A in the document number include the accepted template, the NRC safety evaluation, and corresponding responses to the NRC Requests for Additional Information. Only the accepted template is incorporated by reference. The remainder of the document is referenced but not incorporated into the FSAR.

3. COLA Part 2, FSAR Chapter 1, Table 1.9-201, Regulatory Guide 1.8 will be revised from:

1.8	Qualification and Training of Personnel for Nuclear Power Plants (Rev. 3, May 2000)	12.1 (NEI 07-08) Appendix 12AA Appendix 12AA (NEI 07-03) 13.1.1.4 13.1.3.1 13.2 (NEI 06-13A) 16 (TS 5.3.1)
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To read:

1.8	Qualification and Training of Personnel for Nuclear Power Plants (Rev. 3, May 2000)	12.1 (NEI 07-08) Appendix 12AA Appendix 12AA (NEI 07-03A) 13.1.1.4 13.1.3.1 13.2 (NEI 06-13A) 16 (TS 5.3.1)
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4. COLA Part 2, FSAR Chapter 1, Table 1.9-201, Regulatory Guide 1.97, will be revised from:

1.97	Criteria For Accident Monitoring Instrumentation For Nuclear Power Plants (Rev. 4, June 2006)	Appendix 12AA (NEI 07-03) 16 (TS bases 3.3.3)
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To read:

1.97	Criteria For Accident Monitoring Instrumentation For Nuclear Power Plants (Rev. 4, June 2006)	Not referenced
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1.97	Criteria For Accident Monitoring Instrumentation For Nuclear Power Plants (Rev. 3, May 1983)	Appendix 12AA 16 (TS Bases 3.3.3)
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5. COLA Part 2, FSAR Chapter 1, Table 1.9-201, Regulatory Guide 1.206, FSAR cross-reference column entry, will be revised to add "Appendix 12AA (NEI 07-03A)"
  
6. COLA Part 2, FSAR Chapter 1, Table 1.9-201, Division 8 Regulatory Guides will be revised to read:

8.2	Guide for Administrative Practices in Radiation Monitoring (Rev. 0, February 1973)	12.1 (NEI 07-08) 12.3.4 Appendix 12AA (NEI 07-03A)
8.4	Direct-Reading and Indirect-Reading Pocket Dosimeters (Rev. 0, February 1973)	Appendix 12AA (NEI 07-03A)
8.5	Criticality and Other Interior Evacuation Signals (Rev. 1, March 1981)	Appendix 12AA (NEI 07-03A)
8.6	Standard Test Procedure for Geiger-Muller Counters (Rev. 0, May 1973)	Appendix 12AA (NEI 07-03A)
8.7	Instructions for Recording and Reporting Occupational Radiation Exposure Data (Rev. 2, November 2005)	12.1 (NEI 07-08) Appendix 12AA (NEI 07-03A)
8.8	Information Relevant to Ensuring That Occupational Radiation Exposures at Nuclear Power Stations Will Be as Low as Is Reasonably Achievable (Rev. 3, June 1978)	12.1 (NEI 07-08) 12.3.4 Appendix 12AA Appendix 12AA (NEI 07-03A) 13.1.2
8.9	Acceptable Concepts, Models, Equations, and Assumptions for a Bioassay Program (Rev. 1, July 1993)	12.1 (NEI 07-08) Appendix 12AA (NEI 07-03A)
8.10	Operating Philosophy for Maintaining Occupational Radiation Exposures as Low as Is Reasonably Achievable (Rev. 1-R, May 1977)	12.1 (NEI 07-08) 12.3.4 Appendix 12AA Appendix 12AA (NEI 07-03A) 13.1.2
8.13	Instruction Concerning Prenatal Radiation Exposure (Rev. 3, June 1999)	12.1 (NEI 07-08) Appendix 12AA (NEI 07-03A)
8.15	Acceptable Programs for Respiratory Protection (Rev. 1, October 1999)	12.1 (NEI 07-08) Appendix 12AA (NEI 07-03A)
8.27	Radiation Protection Training for Personnel at Light-Water-Cooled Nuclear Power Plants (Rev. 0, March 1981)	12.1 (NEI 07-08) Appendix 12AA (NEI 07-03A)
8.28	Audible-Alarm Dosimeters (Rev. 0, August 1981)	12.1 (NEI 07-08) Appendix 12AA (NEI 07-03A)
8.29	Instruction Concerning Risks from Occupational Radiation Exposure (Rev. 1, February, 1996)	12.1 (NEI 07-08) Appendix 12AA (NEI 07-03A)



8.34	Monitoring Criteria and Methods To Calculate Occupational Radiation Doses (Rev. 0, July 1992)	12.1 (NEI 07-08) Appendix 12AA (NEI 07-03A)
8.35	Planned Special Exposures (Rev. 0, June 1992)	12.1 (NEI 07-08) Appendix 12AA (NEI 07-03A)
8.36	Radiation Dose to the Embryo/Fetus (Rev. 0, July 1992)	12.1 (NEI 07-08) Appendix 12AA (NEI 07-03A)
8.38	Control of Access to High and Very High Radiation Areas of Nuclear Plants (Rev. 1, May 2006)	12.1 (NEI 07-08) Appendix 12AA Table 12AA-201 Appendix 12AA (NEI 07-03A)

7. COLA Part 2, FSAR Chapter 12, Section 12.3.5.1, will be revised from:

This COL item is addressed in Appendix 12AA.

To read:

This COL item is addressed in Subsection 12.5.4 and Appendix 12AA.

8. COLA Part 2, FSAR Chapter 12, Section 12.5, will be revised to add new text after Section 12.5.2.2 (with an LMA of STD COL 12.3-1) that reads:

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12.5.4 Controlling Access and Stay Time

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Add the following text to the end of DCD Subsection 12.5.4.

STD COL 12.3-1 A closed circuit television system may be installed in high radiation areas to allow remote monitoring of individuals entering high radiation areas by personnel qualified in radiation protection procedures.

9. COLA Part 2, FSAR Chapter 12, Appendix 12AA will be revised in its entirety as shown in Attachment 12.01-01A to this enclosure. The changes include those provided in the response to BLN-RAI-LTR-142 (NRC RAI Number 01-11, ADAMS ML083510576).

10. COLA Part 2, FSAR Chapter 12, Appendix 12AA, add new Table 12AA-201 (with an LMA of STD COL 12.3-1) as shown in Attachment 12.01-01B to this enclosure.

**ASSOCIATED ATTACHMENTS/ENCLOSURES:**

- Attachment 12.01-01A – Composite revision to Part 2, FSAR Chapter 12; Appendix 12AA, including Change No. 5 previously identified in TVA response to BLN-RAI-LTR-142 dated January 27, 2009 (NRC RAI number 1-11)
- Attachment 12.01-01B – Table 12AA-201
- Enclosure 2 – VEGP Additional Plant-Specific changes

**Attachment 12.01-01A**

**Composite Revised FSAR Appendix 12AA  
(5 pages including this cover)**

**Attachment 12.01-01A to ND-09-1529**  
**COL Application**  
**Part 2 - FSAR**

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Add the following Appendix after Section 12.5 of the DCD.

**APPENDIX 12AA RADIATION PROTECTION PROGRAM DESCRIPTION**

STD COL 12.1-1  
STD COL 12.3-1  
STD COL 12.5-1

This appendix incorporates by reference NEI 07-03A, Generic FSAR Template Guidance for Radiation Protection Program Description. See Table 1.6-201. The numbering of NEI 07-03A is revised from 12.5# to 12AA.5# through the document, with the following revisions and additions as indicated by strikethroughs and underlines. Table 13.4-201 provides milestones for radiation protection program implementation.

Revise bullet number 3 of NEI 07-03A Section 12.5 as follows:

3. Prior to initial loading of fuel in the reactor, all of the radiation program functional areas described in Appendix 12AA ~~Section 12.5~~ will be fully implemented, with the exception of the organization, facilities, equipment, instrumentation, and procedures necessary for transferring, transporting or disposing of radioactive materials in accordance with 10 CFR Part 20, Subpart K, and applicable requirements in 10 CFR Part 71. In addition, the position of radiation protection manager (as described in ~~Section 13.1 12.5.2.3~~) will be filled and at least one (1) radiation protection technician for each operating shift, selected, trained, and qualified consistent with the guidance in Regulatory Guide 1.8, will be onsite and on duty when fuel is initially loaded in the reactor, and thereafter, whenever fuel is in the reactor.

Revise the first paragraph of NEI 07-03A Subsection 12.5.2 as follows:

Qualification and training criteria for site personnel are consistent with the guidance in Regulatory Guide 1.8 and are described in FSAR Chapter 13. Specific radiation protection responsibilities for key positions within the plant organization are described in Section 13.1 ~~below~~.

Subsections 12.5.2.1 through 12.5.2.5 of NEI 07-03A are not incorporated into Appendix 12AA.

Subsection 12.5.3.1 of NEI 07-03A is not incorporated into Appendix 12AA. Facilities are described in DCD Subsection 12.5.2.2.

Add the following text after the first paragraph of NEI 07-03A Subsection 12.5.3.3.

If circumstances arise in which NIOSH tested and certified respiratory equipment is not used, compliance with 10 CFR 20.1703(b) and 20.1705 is maintained.

**Attachment 12.01-01A to ND-09-1529**  
**COL Application**  
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The following headings (and associated material) in Subsection 12.5.4.2 of NEI 07-03A are described in DCD Subsection 12.5.3, and are therefore not incorporated into Appendix 12AA:

- Radwaste Handling
  - Spent Fuel Handling
  - Normal Operation
  - Sampling
- 

Add the following text after the second paragraph of NEI 07-03A Subsection 12.5.4.4.

STD COL 12.3-1

Table 12AA-201 identifies plant areas designated as Very High Radiation Areas (VHRAs), lists corresponding plant layout drawings showing the VHRA in DCD Section 12.3, specifies the condition under which the area is designated VHRA, identifies the primary source of the VHRA, and summarizes the frequency of access and reason for access. VHRAs are listed as Radiation Zone IX, which corresponds to a dose rate greater than 500 rad/hr.

In each of the VHRAs, with the exception of the Reactor Vessel Cavity and Delay-Bed / Guard-Bed Compartment, the primary radioactive source is transient (such as fuel passing through the transfer tube), removable (such as resin in the demineralizers), or can be relocated. When the primary source is removed, the dose rate in each of these areas will be less than Zone IX and, in effect, the area will no longer be a VHRA. With planning, the need for human entrance to a VHRA when the primary source is present can be largely or entirely avoided.

In addition to the access control requirements for high radiation areas, the following control measures are implemented to control access to very high radiation areas in which radiation levels could be encountered at 500 rads or more in one hour at one meter from a radiation source or any surface through which the radiation penetrates:

- Sign(s) conspicuously posted stating GRAVE DANGER, VERY HIGH RADIATION AREA.
- Area is locked. Each lock shall have a unique core. The keys shall be administratively controlled by the functional manager in charge of radiation protection as described in Section 13.1.
- Plant Manager's (or designee) approval required for entry.

**Attachment 12.01-01A to ND-09-1529**  
**COL Application**  
**Part 2 - FSAR**

- Radiation Protection personnel shall accompany person(s) making the entry. Radiation Protection personnel shall assess the radiation exposure conditions at the time of the entry.

A verification walk down will be performed with the purpose of verifying barriers to the Very High Radiation Areas in the final design of the facility are consistent with Regulatory Guide 8.38 guidance as part of the implementation of the Radiation Protection and ALARA programs on the schedule identified in Table 13.4-201.

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Revise the third paragraph of NEI 07-03A Subsection 12.5.4.7 as follows.

STD COL 12.1-1 As described in Sections 12.1, 12.5.4 Appendix 12AA and 12.5.2-13.1,  
STD COL 12.3-1 management policy is established, and organizational responsibilities and  
STD COL 12.5-1 authorities are assigned to implement an effective program for maintaining occupational radiation exposures ALARA. Procedures are established and implemented that are in accordance with 10 CFR 20.1101 and consistent with the guidance in Regulatory Guides 8.8 and 8.10. Examples of such procedures include the following:

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Add the following text after the last bullet of NEI 07-03A Subsection 12.5.4.8.

STD COL 12.5-1 This subsection adopts NEI 08-08 (Reference 201), which is currently under review by the NRC staff, for discussion of compliance with 10 CFR 20.1406.

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Revise the first paragraph of Subsection 12.5.4.12 of NEI 07-03A to read:

STD COL 12.5-1 The radiation protection program and procedures are established, implemented, maintained, and reviewed consistent with the 10 CFR 20.1101 and the quality assurance criteria described in Part III of the Quality Assurance Program Description described in Section 17.5.

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Add the following Subsection to the information incorporated from NEI 07-03A.

**Attachment 12.01-01A to ND-09-1529  
COL Application  
Part 2 - FSAR**

STD COL 12.3-3    **12AA.5.4.14   Groundwater Monitoring Program**

A groundwater monitoring program beyond the normal radioactive effluent monitoring program is developed. If necessary to support this groundwater monitoring program, design features will be installed during the plant construction process. Areas of the site to be specifically considered in this groundwater monitoring program are (all directions based on plant standard):

- West of the auxiliary building in the area of the fuel transfer canal.
- West and south of the radwaste building.
- East of the auxiliary building rail bay and the radwaste building truck doors

This subsection adopts NEI 08-08 (Reference 201), which is currently under review by the NRC staff, for the Groundwater Monitoring Program description.

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Add the following Subsection to the information incorporated from NEI 07-03A.

STD COL 12.3-4    **12AA.5.4.15   Record of Operational Events of Interest for Decommissioning**

This subsection adopts NEI 08-08 (Reference 201), which is currently under review by the NRC staff, for discussion of recordkeeping practices important to decommissioning.

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Revise the REFERENCES section of NEI 07-03A, Reference 8, as follows:

8. Regulatory Guide 1.97, Revision 3, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident." 4, ~~"Criteria for Accident Monitoring Instrumentation for Nuclear Power Plants."~~

Add the following reference to the NEI 07-03A REFERENCES.

201. NEI 08-08, Generic FSAR Template Guidance for Life Cycle Minimization of Contamination, Revision 0.
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**Attachment 12.01-01B**

**New FSAR Table 12AA-201  
(3 pages including this cover)**

**Table 12AA-201**  
**(Sheet 1 of 2)**  
**Very High Radiation Areas (VHRA)**

<b>Room Number</b>	<b>VHRA Location</b>	<b>DCD Figure 12.3-1, Sheet No.</b>	<b>Primary Source(s)</b>	<b>VHRA Conditional Notes</b>	<b>Frequency of Access to VHRA Areas While VHRA Conditions Exist</b>
11105	Reactor Vessel Cavity	3, 4, 5	Neutron activation of the material in and around the cavity during reactor operations, such as the concrete shield walls and the reactor insulation	Note 1	None Required
12151	Spent Fuel Pool Cooling System / Liquid Radwaste System Demineralizer/ Filter room (Inside Wall)	3	Resin in vessels	Notes 6, 8	None Required
12153	Delay-Bed/ Guard-Bed Compartment	3	Activated carbon holding radioactive gases	Note 10	None required
12371	Filter-Storage Area	6, 7	Spent filter cartridges	Notes 4, 6, 7	None required
12372	Resin Transfer Pump/ Valve Room	6	Spent resin in lines	Note 6	None Required
12373	Spent-Resin Tank Room	6	Spent resin in tanks	Note 6	None Required
12374	Waste Disposal Container Area	6	Spent resin in vault	Note 6	None Required
12463	Cask Loading Pit	6	Spent fuel	Notes 2, 6	None Required
12563	Spent Fuel Pit	5, 6	Spent fuel	Note 6	None Required
<b>Fuel Transfer Areas</b>					
12564	Fuel Transfer Tube	6	Fuel in transit	Notes 2, 5, 9	None Required
11205	Reactor Vessel Nozzle Area	5	Fuel in transit	Notes 2, 3, 9	None Required
11504	Refueling Cavity	6	Fuel in transit	Notes 2, 3, 9	None Required



**Table 12AA-201**  
**(Sheet 2 of 2)**  
**Very High Radiation Areas (VHRA)**

Notes

1. VHRA during full power operation; less than 10 Rem/hr 24 hours after plant shutdown.
2. During underwater spent fuel transfer operations, this area can be as high as VHRA.
3. During underwater reactor internals transfers/ storage, this area can be as high as VHRA.
4. During spent resin waste disposal container transfer or loading, this area can be as high as VHRA. The contact dose rate of spent resin containers can be greater than 1000 Rem/hr.
5. Discussion about the Spent Fuel Transfer Canal and Tube Shielding is provided in DCD Subsection 12.3.2.2.9.
6. Source is transient, removable, or can be relocated.
7. VHRA when hatch is removed during spent resin container handling operation.
8. In the event that the room does need to be accessed for maintenance or other reasons, temporary shielding is put in place and the resin is removed from the vessels. These measures reduce exposure rates in the room, such that this room is no longer a VHRA. Remote handling is used for any tasks that require the opening of the access hatch in the ceiling of this room when media is present.
9. These areas have no planned reasons for entry and are only classified as VHRAs during periods of fuel movement. In the event that these rooms do need to be accessed to repair the Fuel-Transfer System, Fuel Transfer Tube Gate Valve, or other components, it is done during a non-fuel movement time. This keeps the dose received by the worker as low as reasonably achievable.
10. Inspection of the equipment in this room, when required, is done using remote viewing equipment. Two plugs between Room 12153 and 12155 contain instruments and the plugs are expected to be removed every 12 to 18 months for performance of maintenance. Administrative procedures are implemented to protect workers pursuant to Regulatory Guide 8.38.

**Southern Nuclear Operating Company**

**ND-09-1529**

**Enclosure 2**

**Plant-Specific Revisions to align R-COLA STD-content related**

**Chapter 12**

**Confirmatory Item**

**CI 12.01-01**

**Revisions**

**See following pages**

**SNC Supplemental Response:**

The Bellefonte R-COLA, Revision 0, was based on Revision 3 of NEI 07-03. The VEGP COLA, Revision 0, was based on Revision 4 of NEI 07-03, thus causing a few deviations in standard content that VEGP elected to identify as site-specific content. This submittal resolves those differences and brings the VEGP and Bellefonte standard content affected by NEI 07-03A into alignment. The changes identified below will be made in a future amendment to incorporate this accepted report as shown in the Application Revisions section below.

This portion of the response is PLANT-SPECIFIC for the VEGP COLA.

**Associated VEGP COL Application Revisions:**

1. COLA Part 2, FSAR Chapter 1, Table 1.9-201, Regulatory Guides 8.4, 8.8, 8.9, 8.10, 8.13, 8.15, 8.27, 8.28, 8.29, 8.34, 8.35, 8.36, and 8.38, will be revised from an LMA of VEGP COL 1.9-1 to an LMA of STD COL 1.9-1.
2. COLA Part 2, FSAR Chapter 1, Table 1.9-201, will be revised to add a separator line after footnote b.
3. COLA Part 2, FSAR Chapter 12, Subsection 12.1.3, will be revised to remove the LMA of VEGP COL 12.1-1 and retain only the LMA of STD COL 12.1-1.
4. COLA Part 2, FSAR Chapter 12, Subsection 12.3.5.1, will be revised to remove the LMA of VEGP COL 12.3-1 and retain only the LMA of STD COL 12.3-1.
5. COLA Part 2, FSAR Chapter 12, Subsection 12.5.5, will be revised from an LMA of VEGP COL 12.5-1 to an LMA of STD COL 12.5-1.
6. COLA Part 2, FSAR Chapter 12, Appendix 12AA, initial paragraph LMAs will be revised from:  
VEGP COL 12.1-1  
VEGP COL 12.3-1  
VEGP COL 12.5-1  
To read:  
STD COL 12.1-1  
STD COL 12.3-1  
STD COL 12.5-1
7. COLA Part 2, FSAR Chapter 12, Appendix 12AA, LMAs associated with change to NEI 07-03A Subsection 12.5.4.7, will be revised from:  
VEGP COL 12.1-1  
VEGP COL 12.3-1  
VEGP COL 12.5-1  
To read:  
STD COL 12.1-1  
STD COL 12.3-1  
STD COL 12.5-1