

Southern Nuclear
Operating Company, Inc.
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MAR 04 2010

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52-026

ND-10-0452

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
Mitigative Strategies Description – Updated Reviewer's Aid

Ladies and Gentlemen:

By letter dated May 29, 2009, Southern Nuclear Operating Company (SNC) submitted changes that will be made to a future revision of the Vogtle Electric Generating Plant (VEGP) Units 3 and 4 combined license application (COLA) to address U.S. Nuclear Regulatory Commission (NRC) requirements in regulation 10 CFR 52.80(d). On June 5, 2009, SNC provided a reviewer's aid to facilitate the NRC's review of the Loss of Large Areas (LOLA) Mitigative Strategies Description (MSD) by using colored text to differentiate between generic, AP1000 standard, and plant-specific text. SNC later supplemented the VEGP Units 3 and 4 MSD in response to NRC requests provided in Request for Additional Information (RAI) Letter No. 042 and subsequent follow-up comments. Several of the RAI responses, which were provided in letters dated October 29, 2009, November 13, 2009, December 23, 2009, and February 5, 2010, included changes to original text that was provided in the May 29, 2009 version of the MSD. This letter provides an update to the June 5th version of the VEGP Units 3 and 4 reviewer's aid that reflects the text revisions that were provided in the four RAI response letters identified above.

The enclosure to this letter provides a discussion of the intended use of the reviewer's aid. **Attachment A to the enclosure provides the updated reviewer's aid for the VEGP 10 CFR 52.80(d) Mitigative Strategies Description, which contains Security-Related Information, and accordingly should be withheld from public disclosure under 10 CFR 2.390(d).**

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

DD92
NRD

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

A handwritten signature in black ink, reading "Charles R. Pierce". The signature is written in a cursive style with a large, stylized "C" and "P".

Charles R. Pierce,
AP1000 Licensing Manager

CRP/BJS/dmw

Enclosure: Loss of Large Areas of the Plant Due to Explosions or Fire, Mitigative Strategies
Description REVIEWER'S AID – March 2010

cc: Southern Nuclear Operating Company

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Mr. J. T. Gasser, Executive Vice President, Nuclear Operations (w/o enclosure)
Mr. D. H. Jones, Site Vice President, Vogtle 3 & 4 (w/o enclosure)
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Document Services RTYPE: AR01.1053
File AR.01.02.06

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Mr. L. M. Cain, Senior Resident Inspector of VEGP (w/o enclosure)

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Mr. K. T. Haynes, Director of Contracts and Regulatory Oversight (w/o enclosure)

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Mr. S. P. Frantz, Morgan Lewis (w/o enclosure)

Mr. P. S. Hastings, NuStart & Duke Energy (w/o enclosure)

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Ms. A. M. Monroe, SCE&G (w/o enclosure)

Mr. T. Beville, DOE/PM (w/o enclosure)

Southern Nuclear Operating Company

ND-10-0452

Enclosure

**Loss of Large Areas of the Plant
Due to Explosions or Fire**

Mitigative Strategies Description

REVIEWER'S AID

March 2010

DISCUSSION OF THE UPDATED VEGP 3 & 4 MITIGATIVE STRATEGIES DESCRIPTION REVIEWER'S AID:

By letter dated May 29, 2009, Southern Nuclear Operating Company (SNC) submitted changes that will be made to a future revision of the Vogtle Electric Generating Plant (VEGP) Units 3 and 4 Combined License (COL) Application to address U.S. Nuclear Regulatory Commission (NRC) requirements in regulation 10 CFR 52.80(d). On June 5, 2009, SNC provided a reviewer's aid to facilitate the NRC's review of the Loss of Large Areas (LOLA) Mitigative Strategies Description (MSD) by using colored text to differentiate between generic, AP1000 standard, and plant-specific text. SNC later supplemented the VEGP Units 3 and 4 MSD in response to NRC requests provided in Request for Additional Information (RAI) Letter No. 042 and subsequent follow-up comments. Several of the RAI responses, which were provided in letters dated October 29, 2009, November 13, 2009, December 23, 2009, and February 5, 2010, included changes to original text that was provided in the May 29, 2009 version of the MSD. This enclosure provides an update to the June 5th version of the VEGP Units 3 and 4 reviewer's aid that reflects the planned text revisions that were provided in the four RAI response letters identified above.

This information will be included in a future revision to the VEGP Units 3 and 4 COL Application. The VEGP Units 3 and 4 LOLA MSD was developed based upon the format and content in a template document that was submitted to the NRC as an attachment to proposed Revision 3, Draft B of the Nuclear Energy Institute (NEI) guidance document, NEI 06-12, B.5.b Phase 2 & 3 Submittal Guideline.

The Mitigative Strategies Description template includes generic text (black font) and non-generic text, which is included in brackets. Generic, black font text is expected to be incorporated verbatim in the site-specific Mitigative Strategies Description documents that are provided by each COL applicant. Applicants are expected to identify variances or deviations that are taken from the template's generic, black font text. Non-generic text includes technology-specific, standard text and site-specific text. The bracketed, technology-specific, standard text is presented in green font text and the bracketed, site-specific text is presented in blue font text.

The VEGP Units 3 & 4 Mitigative Strategies Description document was developed in accordance with the three-colored text approach that was used in the draft NEI template but without indicating the colored text. The June 5th reviewer's aid reflected the appropriate text colors to aid the reviewer in identifying the different contents. The attached reviewer's aid reflects the same text as that in the document that was attached to the May 29, 2009 letter as revised by the RAI responses in SNC's letters dated October 29, 2009, November 13, 2009, December 23, 2009, and February 5, 2010. Revised text is annotated by a vertical revision bar in the right-hand margin. The reviewer's aid text differentiates between generic text (BLACK), AP1000-standard text (GREEN), and SNC/VEGP - specific text (BLUE). Additionally, the cover page has been revised and a watermark added to identify this document as a reviewer's aid, and the revision date has been changed on the cover page. Variances from the NEI template's generic, black font text were identified in an attachment to the May 29, 2009 letter. Additional variances/deviations have been introduced as a result of changes to generic text that were requested by the NRC's RAIs. These variances are not identified specifically in the reviewer's aid; however, they are easily identified as changes to black, generic text from the NEI template. It is further noted that the changes to the template's black text have not been vetted through the industry subject matter experts that developed, reviewed, and approved the NEI 06-12, Rev. 3 template. Consequently, changes to generic black text are presented as AP1000 standard,

green text or SNC/VEGP-specific, blue text, because the industry has not confirmed that this text will be adopted as generic text in the NEI template.

The reviewer's aid is provided to facilitate the NRC's review of the VEGP Units 3 & 4 submittal, as well as the submittals provided by the AP1000 subsequent COL applications (S-COLAs). This reviewer's aid is not provided for staff review, will not be updated or revised to reflect any future changes to the NEI template or the VEGP site-specific document, and will not be included in the VEGP Units 3 and 4 COL Application. **The site-specific document in Attachment A contains Security-Related Information, and accordingly should be withheld from public disclosure under 10 CFR 2.390(d).**

ASSOCIATED ATTACHMENTS/ENCLOSURES:

Attachment A Vogtle Electric Generating Plant, Units 3 and 4; Loss of Large Areas of the Plant due to Explosions or Fire; Mitigative Strategies Description; [Required by 10 CFR 52.80(d)] REVIEWER'S AID (Non-Public Version) (34 pages, including cover page)

NOTE: Attachment A contains Security-Related Information - Withhold Under 10 CFR 2.390(d).