B. L. "Pete" IveyVice President
Nuclear Development Support

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Docket Nos.: 52-025

52-025 52-026 ND-11-0253

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
Information to Address ACRS Questions

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. Following the NRC's detailed review of the initial AP1000 Reference COL application and issuance of an advanced final safety evaluation report (AFSER), the Advisory Committee for Reactor Safeguards (ACRS) also reviewed the application. VEGP is addressing one of the questions from the ACRS members in the enclosure to this letter as the new Reference COL applicant.

If you have any questions regarding this letter, please contact Mr. Wes Sparkman at (205) 992-5061 or Ms. Amy Aughtman at (205) 992-5805.

D092

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Mr. B. L. Ivey states he is a 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

B. L. Ivey

Sworn to and subscribed before me this 8th day of February

Notary Public: <u>Nancy Leuise Henderson</u>

My commission expires: <u>March</u> 23, 2014

BLI/BJS

Enclosure: VEGP Units 3 and 4 COL Application - Information to Address ACRS

Question

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cc: Southern Nuclear Operating Company

- Mr. J. H. Miller, III, President and CEO (w/o enclosure)
- Mr. J. A. Miller, Executive Vice President, Nuclear Development (w/o enclosure)
- 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)
- Mr. T. E. Tynan, Vice President Vogtle (w/o enclosure)
- Mr. M. K. Smith, Technical Support Director (w/o enclosure)
- Mr. D. M. Lloyd, Vogtle 3 & 4 Project Support Director (w/o enclosure)
- Mr. M. J. Ajluni, Nuclear Licensing Director
- Mr. C. R. Pierce, AP1000 Licensing Manager
- Mr. T. C. Moorer, Manager, Environmental Affairs, Chemistry and Rad. Services
- Mr. J. D. Williams, Vogtle 3 & 4 Site Support Manager
- Mr. J. T. Davis, Vogtle 3 & 4 Site Licensing Supervisor
- Mr. W. A. Sparkman, COL Project Engineer
- Ms. A. G. Aughtman, Lead AP1000 Licensing Project Engineer

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Nuclear Regulatory Commission

- Mr. V. M. McCree, Region II Administrator
- Mr. F. M. Akstulewicz, Deputy Director Div. of Safety Systems & Risk Assess. (w/o encl.)
- Mr. R. G. Joshi, Lead Project Manager of New Reactors
- Ms. T. E. Simms, Project Manager of New Reactors
- Mr. B. C. Anderson, Project Manager of New Reactors
- Mr. M. M. Comar, Project Manager of New Reactors
- Ms. S. Goetz, Project Manager of New Reactors
- Mr. J. M. Sebrosky, Project Manager of New Reactors
- Mr. D. C. Habib, Project Manager of New Reactors
- Ms. D. L. McGovern, Project Manager of New Reactors
- Ms. T. L. Spicher, Project Manager of New Reactors
- Ms. M. A. Sutton, Environmental Project Manager
- Mr. M. D. Notich, Environmental Project Manager
- Mr. L. M. Cain, Senior Resident Inspector of VEGP 1 & 2
- Mr, J. D. Fuller, Senior Resident Inspector of VEGP 3 & 4

Georgia Power Company

- Mr. T. W. Yelverton, Nuclear Development Director
- Ms. A. N. Faulk, Nuclear Regulatory Affairs Manager

Oglethorpe Power Corporation

- Mr. M. W. Price, Executive Vice President and Chief Operating Officer
- Mr. K. T. Haynes, Director of Contracts and Regulatory Oversight

Municipal Electric Authority of Georgia

- Mr. J. E. Fuller, Senior Vice President, Chief Financial Officer
- Mr. S. M. Jackson, Vice President, Power Supply

Dalton Utilities

Mr. D. Cope, President and Chief Executive Officer

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Bechtel Power Corporation

Mr. J. S. Prebula, Project Engineer (w/o enclosure)

Mr. R. W. Prunty, Licensing Engineer

Tetra Tech NUS, Inc.

Ms. K. K. Patterson, Project Manager

Shaw Stone & Webster, Inc.

Mr. B. Davis, Vogtle Project Manager (w/o enclosure)

Mr. J. M. Oddo, Licensing Manager

Westinghouse Electric Company, LLC

Mr. S. D. Rupprecht, Vice President, New Plant Product Services (w/o enclosure)

Mr. R. J. Buechel, Consortium Project Director Vogtle Units 3 & 4 (w/o enclosure)

Mr. R. F. Ziesing, Director, US Licensing, NPP

Mr. S. A. Bradley, Vogtle Project Licensing Manager

Mr. M. A. Melton, Manager, Regulatory Interfaces

Mr. D. A. Lindgren, Principal Engineer, AP1000 Licensing and Customer Interface

NuStart Energy

Mr. R. J. Grumbir

Mr. E. R. Grant

Mr. P. S. Hastings

Mr. B. Hirmanpour

Mr. N. Haggerty

Ms. K. N. Slays

Other NuStart Energy Associates

Ms. M. C. Kray, NuStart

Mr. S. P. Frantz, Morgan Lewis

Mr. J. A. Bailey, TVA

Ms. A. L. Sterdis, TVA

Mr. M. Vidard, EDF

Mr. W. Maher, FP&L

Mr. K. Hughey, Entergy

Mr. N. T. Simms, Duke Energy

Mr. G. A. Zinke, NuStart & Entergy

Mr. R. H. Kitchen, PGN

Ms. A. M. Monroe, SCE&G

Mr. T. Miller, DOE/PM

Southern Nuclear Operating Company

ND-11-0253

Enclosure

VEGP Units 3 and 4 COL Application -

Information to Address ACRS Question

ND-11-0253 Enclosure Information to Address ACRS Question

eRAI Tracking No. 3951
NuStart Qb Tracking No. 4254
Re: NRC SER OI Number 15.00-01:

Information related to COL SER open item 15.00-01 was provided in Southern Nuclear Operating Company (SNC) letter ND-10-2091 dated October 29, 2010. During ACRS review of the R-COLA, there was a question as to whether the applicant had sufficiently committed to complete the required calibrations.

In that letter, the four items from the Safety Evaluation Report for use of the Caldon CheckPlusTM Leading Edge Flow Meter (LEFM) were addressed. Item 4 of the SER requested:

4. Licensees for plant installations where the LEFM was not installed with flow elements calibrated to a site-specific piping configuration (flow profiles and meter factors not representative of the plant-specific installation), should provide additional justification for use. This justification should show either that the meter installation is independent of the plant-specific flow profile for the stated accuracy, or that the installation can be shown to be equivalent to known calibrations and the plant configuration for the specific installation, including the propagation of flow profile effects at higher Reynolds numbers. Additionally, for previously installed and calibrated LEFM, the licensee should confirm that the piping configuration remains bounding for the original LEFM installation and calibration assumptions."

To address the ACRS question regarding the clarity of the commitment, the information provided to address this SER item is revised to read as follows:

4. This application represents construction of a new plant with no previously installed flow metering equipment. The AP1000 main feedwater flow measurement instrumentation, consistent with the use of normalized flow meters, is required to be calibrated at a certified test laboratory in hydraulic model geometry consistent with AP1000 plant design. Prior to installation, the LEFM Check Plus System will be calibrated at a certified facility (e.g., Alden Research Laboratories) with a test model representative of plant piping configurations. Calibration standards will be traceable to National Institute of Standards and Technology standards. After installation in the plant, the LEFM Check Plus System will be tested in accordance with the LEFM Check Plus system commissioning procedure developed by Cameron to confirm that the actual instrument performance is consistent with the assumptions of the uncertainty calculation. Therefore, additional justification for use of the LEFM is not required.

In addition, the material included in FSAR Chapter 15, Subsection 15.0.3.2 will also be revised as shown below in the Application Revisions section.

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

Associated VEGP COL Application Revisions:

COLA Part 2 (Rev. 4), FSAR Chapter 15, Subsection 15.0.3.2, will be revised from:

The plant operating instrumentation selected for feedwater flow measurement is a Caldon [Cameron] LEFM CheckPlusTM System (Reference 201). This selected plant operating instrumentation has documented instrumentation uncertainties to calculate a power calorimetric uncertainty that confirms the 1% uncertainty assumed for the initial reactor power in the safety analysis bounds the calculated calorimetric power measurement uncertainty values. This calculated calorimetric is done in accordance with a previously accepted Westinghouse methodology (Reference 202). Administrative controls implement maintenance and contingency activities related to the power calorimetric instrumentation.

To read:

The plant operating instrumentation selected for feedwater flow measurement is a Caldon [Cameron] LEFM CheckPlus System (Reference 201), which will be calibrated (in a certified laboratory using a piping configuration representative of the plant piping design) prior to installation and will be tested after installation in the plant in accordance the LEFM CheckPlus commissioning procedure. This selected plant operating instrumentation has documented instrumentation uncertainties to calculate a power calorimetric uncertainty that confirms the 1% uncertainty assumed for the initial reactor power in the safety analysis bounds the calculated calorimetric power uncertainty values. The calculated calorimetric is done in accordance with a previously accepted Westinghouse methodology (Reference 202). Administrative controls implement maintenance and contingency activities related to the power calorimetric instrumentation.