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SOUTHERN COMPANY

APR 0 5 2012

Docket No.: 52-025

ND-12-0196
10 CFR 50.90

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

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
Preliminary Amendment Request (PAR): Changes to the Structures and Layout of the Annex Building, Turbine Building, and Radwaste Building (PAR-12-004)

Ladies and Gentlemen:

The U.S. Nuclear Regulatory Commission (NRC) issued the Vogtle Electric Generating Plant (VEGP) Unit 3 combined license (COL) (License No. NPF-91) to Southern Nuclear Operating Company (SNC) on February 10, 2012. By letter ND-12-0195, dated April 4, 2012 (LAR-12-004), SNC requested an amendment to the COLs for VEGP Units 3 and 4 to amend VEGP Units 3 and 4 COLs Appendix C plant-specific material and to depart from VEGP Units 3 and 4 plant-specific Design Control Document (DCD) Tier 1 material. These changes are being made for consistency with the finalized design, as provided in the plant-specific DCD Tier 2 material, including changes to various: (1) Annex Building column line designations; (2) Turbine Building layout details; (3) Turbine Building elevations and associated wall thicknesses; and (4) Radwaste Building layout details. Because many of the elements that are subject to the Tier 2 departures are also addressed in DCD Tier 1 (and reflected in Appendix C of the VEGP Units 3 and 4 COLs), plant-specific departures are also proposed to the corresponding material in DCD Tier 1 and the VEGP Units 3 and 4 COLs, Appendix C. Therefore, in accordance with the provisions of 10 CFR 52.63(b)(1), an exemption from elements of the design as certified in the 10 CFR Part 52, Appendix D, design certification rule is also requested for the plant-specific Tier 1 material departures.

VEGP Unit 3 construction activities associated with the installation of forms and Q-decking for the Turbine Building floor slab on El. 100'-0" in the vicinity of the doorway to Room 20303 (between Column Line 17 and Column Lines L.5 to R) are expected to commence in late October 2012. To allow construction activities to proceed in accordance with the current integrated schedule, SNC hereby submits a Preliminary Amendment Request (PAR), PAR-12-004. In order to avoid unnecessary construction delays during the NRC's evaluation of the related license amendment request (LAR), the determination of whether the NRC has any objection to SNC proceeding with the installation and testing of the proposed plant change or modification identified in the PAR/LAR is requested to be provided by September 30, 2012. Delayed determination regarding this PAR

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would result in a delay in the construction of the Turbine Building floor slab and subsequent construction activities that are dependent upon the completion of this activity.

The requested revisions are necessary to support changes that reflect the evolution and advancement of systems and building design identified during design finalization of the turbine, annex, and radwaste buildings. The description, technical evaluation, regulatory evaluation, and proposed markups depicting the requested changes to the COLs and the plant-specific DCD text, tables, and figures are contained in enclosures to the License Amendment Request letter. To facilitate the staff's review of this activity, the proposed markups depicting the requested changes to the plant-specific DCD Tier 1 text, tables, and figures are contained in Enclosures 2 and 3 to this letter. In addition, conforming changes to Tier 2 text, tables, and figures are also provided for context. Enclosure 2 provides markups of material that is publicly available. Enclosure 3 contains Security-Related Information, and accordingly SNC requests that this enclosure be withheld from public disclosure under 10 CFR 2.390(d). This PAR has been developed in accordance with guidance provided in Interim Staff Guidance on Changes during Construction Under 10 CFR Part 52, COL-ISG-25 [ML111530026], and corresponds accurately and technically with the above-mentioned LAR-12-004. The technical scope of this PAR is consistent with the technical scope of the LAR.

This letter does not contain any NRC commitments. Should you have any questions, please contact Mr. Wesley A. Sparkman at (205) 992-5061.

Mr. C. R. Pierce states that he is the Regulatory Affairs Director 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

C. R. Pierce

CRP/NH/dmw

Sworn to and subscribed before me this 5th *day of* April, *2012*

Notary Public: Dana Marie Williams

My commission expires: 12/01/2014

NOTARY PUBLIC STATE OF ALABAMA AT LARGE
MY COMMISSION EXPIRES: Dec 1, 2014
BONDED THRU NOTARY PUBLIC UNDERWRITERS

Enclosure 1: Vogtle Electric Generating Plant (VEGP) Unit 3 – Preliminary Amendment Request Regarding Changes to the Structures and Layout of the Annex Building, Turbine Building, and Radwaste Building (PAR-12-004)
Enclosure 2: Vogtle Electric Generating Plant (VEGP) Unit 3 – Licensing Basis Documents – Proposed Changes (Publicly Available Information)
Enclosure 3: Vogtle Electric Generating Plant (VEGP) Unit 3 – Licensing Basis Documents – Proposed Changes (Withheld Information)

cc: Southern Nuclear Operating Company
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Mr. J. A. Miller, Executive Vice President, Nuclear Development
Mr. D. A. Bost, Chief Nuclear Officer (w/o enclosure)
Mr. B. L. Ivey, VP, Regulatory Affairs
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File AR.01.02.06

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Mr. J. D. Fuller, Senior Resident Inspector of VEGP 3 & 4

State of Georgia
Mr. J. H. Turner, Environmental Protection Division Director

Georgia Power Company
Mr. B. H. Whitley, Nuclear Development Director

Oglethorpe Power Corporation
Mr. M. W. Price, Executive Vice President and Chief Operating Officer (w/o enclosure 3)
Mr. K. T. Haynes, Director of Contracts and Regulatory Oversight (w/o enclosure 3)

Municipal Electric Authority of Georgia
Mr. J. E. Fuller, Senior Vice President, Chief Financial Officer (w/o enclosure 3)
Mr. S. M. Jackson, Vice President, Power Supply (w/o enclosure 3)

Dalton Utilities
Mr. D. Cope, President and Chief Executive Officer (w/o enclosure 3)

Bechtel Power Corporation
Mr. J. S. Prebula, Project Engineer (w/o enclosure)
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Southern Nuclear Operating Company

ND-12-0196

Enclosure 1

Vogtle Electric Generating Plant (VEGP) Unit 3

Preliminary Amendment Request Regarding Changes to the Structures and Layout of the Annex Building, Turbine Building, and Radwaste Building (PAR-12-004)

Pursuant to 10 CFR 50.90, Southern Nuclear Operating Company (SNC) has requested an amendment to Combined License Nos. NPF-91 and NPF-92 for Vogtle Electric Generating Plant (VEGP) Units 3 and 4, respectively. VEGP Unit 3 construction activities associated with the License Amendment Request (LAR) are expected to commence in late October 2012. To allow construction activities to proceed in accordance with the current integrated schedule, SNC hereby submits a Preliminary Amendment Request (PAR), PAR-12-004.

SNC requests the determination of whether the NRC has any objection to proceeding with the installation and testing of the proposed plant change or modification identified in the PAR/LAR to be provided by September 30, 2012.

PAR Request Number:	Station Name:	Unit Number(s):	PAR Request Date:
PAR – 12-004	**VEGP**	☒ **3** ☐ **4**	April 4, 2012

1. NRC PAR Notification Requested Date (see Block 9 for basis): September 30, 2012

2. License Amendment Request References (as applicable):

☒ **LAR submittal date and SNC Correspondence Number:** April 4, 2012 / ND-12-0195

☐ **Expected LAR submittal date:** _____

3. Brief Description of Proposed Change:

Revise the VEGP Units 3 and 4 plant-specific Design Control Document (DCD) Tier 2 material by changing various: (1) Annex Building column line designations; (2) Turbine Building layout details; (3) Turbine Building elevations and associated wall thicknesses; and (4) Radwaste Building layout details. The departure from AP1000 generic Design Control Document (DCD) Tier 1 information also involves similar changes to the VEGP Units 3 and 4 COLs, COL Appendix C Section 3.3, Figures 3.3-11A, 3.3-11B, 3.3-12, and 3.3-13, and Tables 3.3-1, 3.3-6, and 3.5-5 and is supported by corresponding changes to Tier 2 text, tables, and figures.

4. Reason for License Amendment Request:

During the detailed design finalization of the Annex Building, Turbine Building, and Radwaste Building, departures from AP1000 generic DCD Tier 2 information were determined necessary to finalize the layout of space envelopes, orientations, locations and/or piping runs that comprise these structures. This activity requires exemption from the generic DCD Tier 1 text, tables, and figures that support the COL Appendix C ITAAC to allow an accurate reflection of the proposed departures from the associated Tier 2 material.

5. Is Exemption Request Required? ☒ **Yes** ☐ **No**

If Yes, Briefly Describe the Reason for the Exemption. Many of the elements that are subject to the proposed Tier 2 departures are also provided in the plant-specific DCD Tier 1 design description text, tables, and figures. Therefore, to maintain conformance

between the plant-specific design as described in Tier 2 and the design as verified by the plant-specific Tier 1 ITAAC, plant-specific departures are proposed to the corresponding material in DCD Tier 1.

6. Identify Applicable Precedents:

None identified.

7. Preliminary Assessment of Significant Hazards Consideration [10 CFR 50.92(c)]:

The proposed changes would revise the Combined License (COL) Nos. NPF-91 and NPF-92 for Vogtle Electric Generating Plant (VEGP) Units 3 and 4, respectively, in regard to the AP1000 structures and layout by: (1) Removing extraneous Column Line designations in the Annex Building; (2) Modifying certain aspects of the Turbine Building layout; (3) Increasing elevations and wall thickness in the First Bay; and (4) Modifying certain aspects of the Radwaste Building layout. The departure from AP1000 generic DCD Tier 1 information also involves changes to COL Appendix C Section 3.3, Figures 3.3-11A, 3.3-11B, 3.3-12, and 3.3-13, and Tables 3.3-1, 3.3-6, and 3.5-5.

An evaluation to determine whether or not a significant hazards consideration is involved with the proposed amendment was completed by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

No physical design change is being made as a result of removal of the Annex Building column line numbers from Tier 1 figures or the corresponding figures included in the COL. This change removes extraneous detail that is unnecessary detail for Tier 1 figures and the corresponding figures included in the COL. Consequently, there is no change to any structures, systems, and components (SSCs), to any plant operations, or to any design function or analysis that verifies the capability of an SSC to perform a design function. This change would not affect any of the previously evaluated accident analyses in the plant-specific Design Control Document (DCD) or Final Safety Analysis Report (FSAR). Consequently, there is no change in the probability or consequences of an accident previously evaluated.

The Turbine Building changes to re-orient the double door from room 20303, add a new column line indicator to the arrangement drawing, move two column line indicators from the top to the bottom of that drawing, and designate one of the moved column line indicators for the southeast wall of the Turbine Building do not involve any accident-initiating components or faults nor do they involve a safety-related accident mitigation function. The Turbine Building layout changes do not adversely affect the Fire Protection Analysis in Appendix 9A of the plant-specific DCD. Furthermore, the 3-hour fire rating for the double door and the wall in which the double door is located is not changed as a result of relocating the double door. Therefore, no accident probability or radiological consequence is affected by this departure.

The Turbine Building is a nonsafety-related structure that houses the main turbine generator and the power conversion cycle equipment and auxiliaries. There is no safety-related equipment in the Turbine Building. The change to the elevation and thickness of the Turbine Building First Bay walls is in response to a beneficial change which provides more space for piping, pipe supports and other equipment between floors at three different elevations of the Turbine Building. Accessibility for repair and maintenance is improved. The maximum wall elevation change provides the required space for steam venting and the wall thickness change maintains the Seismic Category II design for the First Bay walls. Consequently, there is no adverse change to any SSCs, to any plant operations, or to any design function or analysis that verifies the capability of an SSC to perform a design function. This change does not affect any of the previously evaluated accident analyses in the plant-specific DCD or UFSAR. The Turbine Building elevation changes do not adversely affect the Fire Protection Analysis in Appendix 9A of the plant-specific DCD. Consequently, this departure involves no change in the probability or consequences of an accident previously evaluated.

The changes to the Radwaste Building to add shielded bunkers for storage of moderate level waste, combine the Waste Accumulation room and Packaged Waste Storage room for ease of operability, and add additional shielding to the Waste Monitor tanks will provide additional shielding to allow storage of moderate level radioactive waste and maintain portions of the building as radiation Zone I areas. The Radwaste Building is a non-seismic building, which contains no safety-related SSCs. There is no adverse change to the function of the Radwaste Building and the operations conducted therein as a result of this departure. The Radwaste Building layout changes do not adversely affect the Fire Protection Analysis in Appendix 9A of the plant-specific DCD. Consequently, there is no adverse functional change to any SSCs, any plant operations, or any design function or analysis that verifies the capability of an SSC to perform a design function. This change would not affect any of the previously evaluated accident analyses in the plant-specific DCD or UFSAR. Consequently, there is no change in the probability or consequences of an accident previously evaluated.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. **Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?**

Response: No

There is no physical design change being made as a result of removal of the Annex Building column line numbers. This change removes unnecessary detail from Tier 1 figures and the corresponding figures included in the COL. No safety-related equipment or fission product barrier is involved. Therefore, the departure does not allow for a new fission product release path, result in a new fission product barrier failure mode, or create a new sequence of events that would result in significant fuel cladding failures, and thus, does not create the possibility of a new or different kind of accident.

The Turbine Building changes to re-orient the double door from room 20303, add a

new column line indicator to the general arrangement drawing, move two column line indicators from the top to the bottom of the general arrangement drawing, and designate one of the moved column line indicators for the southeast wall of the Turbine Building do not involve any accident initiating components or faults, or safety-related accident mitigation functions. No safety-related equipment or fission product barrier is involved. Therefore, the departure does not allow for a new fission product release path, result in a new fission product barrier failure mode, or create a new sequence of events that would result in significant fuel cladding failures, and thus, does not create the possibility of a new or different kind of accident.

The Turbine Building is a nonsafety-related structure that houses the main turbine generator and the power conversion cycle equipment and auxiliaries and contains no safety-related equipment. The change to the elevation and thickness of the Turbine Building First Bay walls is in response to a beneficial change that provides more space for piping, pipe supports and other equipment between floors at three different elevations of the Turbine Building and improves accessibility for repair and maintenance. The maximum wall elevation change provides the required space for steam venting and the wall thickness change maintains Seismic Category II design for the First Bay walls. No safety-related equipment or fission product barrier is involved. Therefore, the departure does not allow for a new fission product release path, result in a new fission product barrier failure mode, or create a new sequence of events that would result in significant fuel cladding failures, and thus, does not create the possibility of a new or different kind of accident.

The changes to the Radwaste Building to add shielded bunkers for storage of moderate level waste, combine the Waste Accumulation room and Packaged Waste Storage room for ease of operability, and add additional shielding to the Waste Monitor tanks will provide additional shielding to allow storage of moderate level radioactive waste and maintain portions of the building as radiation Zone I areas. The Radwaste Building is a non-seismic building, which contains no safety-related SSCs. There is no adverse change to the function of the Radwaste Building and the operations conducted therein as a result of this departure. No safety-related equipment or fission product barrier is involved. Therefore, the departure does not allow for a new fission product release path, result in a new fission product barrier failure mode, or create a new sequence of events that would result in significant fuel cladding failures, and thus, does not create the possibility of a new or different kind of accident.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

4.1.3 Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No

No physical design change is being made as a result of removal of the Annex Building column line numbers. This change removes unnecessary detail from Tier 1 figures and the corresponding figures included in the COL. No safety-related equipment or function is affected by this change. No safety analysis or design basis acceptance limit/criterion is challenged or exceeded by the change, and thus, no

margin of safety is reduced.

The Turbine Building changes to re-orient the double door from room 20303, add a new column line indicator to the general arrangement drawing, move two column line indicators from the top to the bottom of the general arrangement drawing, and designate one of the moved column line indicators for the southeast wall of the Turbine Building do not involve any accident initiating components or faults or safety-related accident mitigation functions. No safety-related equipment or function is affected by this change. No safety analysis or design basis acceptance limit/criterion is challenged or exceeded by the change, and thus, no margin of safety is reduced.

The Turbine Building is a nonsafety-related structure that houses the main turbine generator and the power conversion cycle equipment and auxiliaries and contains no safety-related equipment. The change to the elevation and thickness of the Turbine Building First Bay walls is in response to a beneficial change that provides more space for piping, pipe supports and other equipment between floors at three different elevations of the Turbine Building and improves accessibility for repair and maintenance. The maximum First Bay wall elevation change provides the required space for steam venting and the thickness change maintains the Seismic Category II design of the First Bay walls. No safety-related equipment or function is affected by this change. No safety analysis or design basis acceptance limit/criterion is challenged or exceeded by the change, and thus, no margin of safety is reduced.

The changes to the Radwaste Building to add shielded bunkers for storage of moderate level waste, combine the Waste Accumulation room and Packaged Waste Storage room for ease of operability, and add additional shielding to the Waste Monitor tanks, will provide additional shielding to allow storage of moderate level radioactive waste and maintain portions of the building as radiation Zone I areas. The Radwaste Building is a non-seismic building, which contains no safety-related SSCs. There is no adverse change to the function of the Radwaste Building and the operations conducted therein as a result of this departure. No safety-related equipment or function is affected by this change. No safety analysis or design basis acceptance limit/criterion is challenged or exceeded by the change, and thus, no margin of safety is reduced.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, it is concluded that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

8. Preliminary Assessment of Categorical Exclusion from Environmental Review [10 CFR 51.22]:

SNC requests an amendment to the VEGP Units 3 and 4 Combined Licenses to allow departures from various elements of the certification information in Tier 1 of the generic AP1000 DCD and an amendment to the corresponding elements in Appendix C of the VEGP Units 3 and 4 Combined Licenses. The Tier 1 elements for which a departure is requested include ITAAC and the supporting information specified in the text, tables, and figures referenced in each individual ITAAC. The Tier 1 departure includes changes, clarifications, and editorial corrections to detailed information that supports existing ITAAC, such as changes

to room names, floor elevations and concrete wall thicknesses, column line designations, and similar supporting information. The proposed departure from AP1000 generic DCD Tier 1 material reflects corresponding departures from Tier 2 material that will change various: (1) Annex Building column line designations; (2) Turbine Building layout details; (3) Turbine Building elevations and associated wall thicknesses; and (4) Radwaste Building layout details.

SNC has determined that the proposed departure would require an amendment from the VEGP Units 3 and 4 COLs; however, SNC evaluation of the proposed amendment has determined that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.25(c)(9), in that:

(i) There is no significant hazards consideration.

As documented in Section 4.1 of the associated license amendment request (LAR-12-004), Significant Hazards Consideration, an evaluation was completed to determine whether or not a significant hazards consideration is involved by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment." The Significant Hazards Consideration determined that (1) the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated; (2) the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated; and (3) the proposed amendment does not involve a significant reduction in a margin of safety. Therefore, it is concluded that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of "no significant hazards consideration" is justified.

(ii) There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

The proposed changes to features of the annex building, turbine building, and radwaste building structures and layout include raising the elevation of the Turbine Building First Bay roof and increasing the thickness of underlying walls, removing and relocating walls and doorways, removing and revising column line designations, adding bunkers for the segregation of moderate level waste and low level waste, and eliminating a duplicate area radiation monitor. The changes to the Annex Building and Turbine Building affect features of the building structures that are unrelated to any aspects of plant operation that would introduce any changes to effluent types (e.g., effluents containing chemicals or biocides, sanitary system effluents, and other effluents) or affect any plant radiological or non-radiological effluent release quantities. The changes to the Radwaste Building configuration affect the storage locations of low and medium activity waste, but do not change any assumptions related to waste input streams or discharge quantities. Furthermore, these structures and layout changes do not diminish the functionality of any design or operational features that are credited with controlling the release of effluents during plant operation. Therefore, it is concluded that the proposed amendment does not involve a significant change in the types or a significant increase in the amounts of any effluents that may be released offsite.

(iii) There is no significant increase in individual or cumulative occupational radiation exposure.

The proposed changes to the structure and layout of the Annex Building and Turbine Building only affect areas of the plant that contain non-radioactive plant systems. Consequently, these changes have no impact on individual or cumulative occupational radiation exposure. The Radwaste Building changes allow segregation of moderate activity radwaste from the remainder of the waste, thereby reducing operational exposure while workers handle low level waste. The addition of a partial labyrinth wall in the Radwaste Building and the modification to the configuration of the access doorway to the Monitor Tanks room through the Waste Accumulation room will result in a reduction in the radiation levels in the Monitor Tanks room and the adjacent HVAC equipment room. Furthermore, dose rates in adjacent areas to the Radwaste Building, including the outdoor radiation area south of the Waste Accumulation room and Monitor Tanks room and on the roof, are still maintained As Low As is Reasonably Achievable (ALARA). The single detector in the Waste Accumulation room will have a local readout, an audible alarm, and visual alarm for the monitored area that will continue to alert personnel to increasing exposure rates in the area; thereby protecting workers from elevated radiation levels in this room. Consequently, the proposed changes to the Radwaste Building structure and layout are not expected to increase individual or cumulative occupational radiation exposure. Therefore, it is concluded that the proposed amendment does not involve a significant increase in individual or cumulative occupational radiation exposure.

Based on the above review of the proposed amendment, SNC has determined that the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in the individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental impact statement or environmental assessment of the proposed amendment is not required.

9. Impact of Change on Installation and Testing Schedules:

LAR-12-004 supports the relocation of a doorway to Room 20303 on El. 100'-0" of the Turbine Building to allow for relocation of an intermediate column. Installation of the forms for the floor slab that includes room 20303 is estimated to commence by October 30, 2012. Delayed approval of this licensing action would result in a delay in the setting of these forms and subsequent construction activities that are dependent upon the completion of this work.

No testing is impacted by the change to these structural modules.

10. Impact of Change on ITAAC:

The ITAAC related to Nuclear Island (NI) structures are specified in Section 3.3 of Appendix C to the VEGP Unit 3 COL. The following ITAAC are directly impacted by this license amendment/exemption request:

- ITAAC No. 3.3.00.04c (783) – This ITAAC addresses the walls of the packaged waste storage room in the Radwaste Building. This plant-specific departure merges the packaged waste storage room and the waste accumulation room, thereby eliminating the packaged waste storage room. Therefore, ITAAC No. 3.3.00.04c is no longer applicable, and is deleted by this departure.
- ITAAC No. 3.3.00.06b (788) – This ITAAC addresses the volume of the packaged waste storage room (50352). Because the packaged waste storage room is being eliminated by this plant-specific departure, this ITAAC is revised by changing the room to the waste accumulation room (50351). Additionally, the minimum volume of this room is changed from 1293 cubic feet to 1417 cubic feet to reflect the maximum expected annual radwaste for the AP1000.

The following ITAAC are indirectly impacted by this license amendment/exemption request:

- ITAAC 3.3.00.01 (759): This ITAAC addresses the physical arrangement of the nuclear island structures and the annex building and verifies conformance with the Design Description of Appendix C Section 3.3 and Figures 3.3-1 through 3.3-14. This plant-specific departure will revise the Design Commitments 4.c) and 6.b) in Section 3.3, and Tier 1 Figures 3.3-11A, 3.3-11B, 3.3-12, and 3.3-13; therefore, the performance of ITAAC 3.3.00.01 will be indirectly impacted by the proposed license amendment/exemption request.
- ITAAC 3.3.00.02a.ii.f (769): This ITAAC addresses the concrete thicknesses of the turbine building sections and verifies conformance of the sections defined in Table 3.3-1. This plant-specific departure will revise the thickness of two Turbine Building walls identified in Table 3.3-1 ("Wall adjacent to Column Line I.2" and "Wall adjacent to Column Line R"), adds a new column line 11.02 to indicate the centerline of the First Bay southwest wall, and uses the existing column line 11.05 to indicate the centerline of the First Bay southeast wall. Therefore, the performance of ITAAC 3.3.00.02a.ii.f will be indirectly impacted by the proposed license amendment/exemption request.

The ITAAC related to radiation monitors is specified in Section 3.5 of Appendix C to the VEGP Unit 3 COL. The following ITAAC is indirectly impacted by this license amendment/exemption request:

- ITAAC 3.5.00.08 (833): This ITAAC addresses the existence of area radiation monitors in Table 3.5-5. This plant-specific departure will revise Tier 1 Table 3.5-5 by removing the note regarding the use of multiple detectors for the Liquid and Gaseous Radwaste Area monitor. Therefore, the performance of ITAAC 3.3.00.02a.ii.f will be indirectly impacted by the proposed license amendment/exemption request.

11. Additional Information:

None.

Southern Nuclear Operating Company

ND-12-0196

Enclosure 2

Vogtle Electric Generating Plant (VEGP) Unit 3

Licensing Basis Documents - Proposed Changes
(Publicly Available Information)

Tier 1, Section 3.3, Design Commitments 4.c) and 6.b)

"Buildings"

(Note that this change is also incorporated into the Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Combined Licenses (COLs) Appendix C, Inspections, Tests, Analyses, and Acceptance Criteria)

[DCD Tier 1, pg. 3.3-3]

4. c) Deleted. ~~The walls on the outside of the packaged waste storage room in the radwaste building provide shielding from stored waste.~~

* * *

6. b) The radwaste building waste accumulation ~~packaged waste storage~~ room has a volume greater than or equal to 1417 ~~1293~~ cubic feet.

[VEGP Unit 3 COL, Appendix C, pg. C-410]

4. c) Deleted. ~~The walls on the outside of the packaged waste storage room in the radwaste building provide shielding from stored waste.~~

* * *

6. b) The radwaste building waste accumulation ~~packaged waste storage~~ room has a volume greater than or equal to 1417 ~~1293~~ cubic feet.

[VEGP Unit 4 COL, Appendix C, pg. C-410]

4. c) Deleted. ~~The walls on the outside of the packaged waste storage room in the radwaste building provide shielding from stored waste.~~

* * *

6. b) The radwaste building waste accumulation ~~packaged waste storage~~ room has a volume greater than or equal to 1417 ~~1293~~ cubic feet.

{128}

Tier 1, Table 3.3-1

"Definition of Wall Thicknesses for Nuclear Island Buildings, Turbine Building, and Annex Building"

(This change is also incorporated into VEGP Unit 3 and Unit 4 COLs, Appendix C)

[DCD Tier 1, pg. 3.3-12]

Wall or Section Description	Column Lines	Floor Elevation or Elevation Range	Concrete Thickness	Applicable Radiation Shielding Wall (Yes/No)
Wall adjacent to Column Line I.2	From Col. Line 11.05 to 11.2	From 100'-0" to 1694'-0"	32'-0"	No
Wall along Column Line 11.2	From near I.2 to near Col. Line R	From 100'-0" to 1694'-0"	2'-0"	No
Wall adjacent to Column Line R	From Col. Line 11.2 to Col. Line 11.02 ~~11.05~~	From 100'-0" to 1694'-0"	32'-0"	No
Wall along Column Line 11.02~~11.05~~	From near Col. Line R to Col. Line Q	From 100'-0" to 1694'-0"	2'-0"	No
Wall along Column Line 11.05	From Col. Line K.4 to near Col. Line I.2	From 100'-0" to 1694'-0"	2'-0"	No

[VEGP Unit 3 COL, Appendix C, pg. C-419]

Wall or Section Description	Column Lines	Floor Elevation or Elevation Range	Concrete Thickness	Applicable Radiation Shielding Wall (Yes/No)
Wall adjacent to Column Line I.2	From Col. Line 11.05 to 11.2	From 100'-0" to 1694'-0"	32'-0"	No
Wall along Column Line 11.2	From near I.2 to near Col. Line R	From 100'-0" to 1694'-0"	2'-0"	No
Wall adjacent to Column Line R	From Col. Line 11.2 to Col. Line 11.02	From 100'-0" to 1694'-0"	32'-0"	No
Wall along Column Line 11.02~~11.05~~	From near Col. Line R to Col. Line Q	From 100'-0" to 1694'-0"	2'-0"	No
Wall along Column Line 11.05	From Col. Line K.4 to near Col. Line I.2	From 100'-0" to 1694'-0"	2'-0"	No

[VEGP Unit 4 COL, Appendix C, pg. C-419]

Wall or Section Description	Column Lines	Floor Elevation or Elevation Range	Concrete Thickness	Applicable Radiation Shielding Wall (Yes/No)
Wall adjacent to Column Line I.2	From Col. Line 11.05 to 11.2	From 100'-0" to 1694'-0"	32'-0"	No
Wall along Column Line 11.2	From near I.2 to near Col. Line R	From 100'-0" to 1694'-0"	2'-0"	No
Wall adjacent to Column Line R	From Col. Line 11.2 to Col. Line 11.02	From 100'-0" to 1694'-0"	32'-0"	No
Wall along Column Line 11.02~~11.05~~	From near Col. Line R to Col. Line Q	From 100'-0" to 1694'-0"	2'-0"	No
Wall along Column Line 11.05	From Col. Line K.4 to near Col. Line I.2	From 100'-0" to 1694'-0"	2'-0"	No

{14, 60}

Tier 1, Table 3.3-6

"Buildings - Inspections, Tests, Analyses, and Acceptance Criteria"

(This change is also incorporated into VEGP Unit 3 and Unit 4 COLs, Appendix C)

[DCD Tier 1, pg. 3.3-21 & 3.3-22]

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
4.c) Deleted. ~~Walls of the packaged waste storage room in the radwaste building except for designed openings or penetrations provide shielding during normal operations.~~	~~Inspection of the as-built radwaste building wall thicknesses will be performed.~~	~~A report exists and concludes that the shield walls of the packaged waste storage room in the radwaste building except for the wall shared with the waste accumulation room and designed openings or penetrations are consistent with the minimum concrete wall thicknesses of 2'.~~
* * *		
6.b) The radwaste building waste accumulation ~~package waste storage~~ room has a volume greater than or equal to 1417 ~~1293~~ cubic feet.	An inspection of the radwaste building waste accumulation ~~package waste storage~~ room (5035~~1~~2) is performed.	The volume of the radwaste building waste accumulation ~~package waste storage~~ room (5035~~1~~2) is greater than or equal to 1417 ~~1293~~ cubic feet.

[VEGP Unit 3 COL, Appendix C, pg. C-428 & C-429]

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
783	3.3.00.04c	4.c) Deleted. ~~Walls of the packaged waste storage room in the radwaste building except for designed openings or penetrations provide shielding during normal operations.~~	~~Inspection of the as-built radwaste building wall thicknesses will be performed.~~	~~A report exists and concludes that the shield walls of the packaged waste storage room in the radwaste building except for the wall shared with the waste accumulation room and designed openings or penetrations are consistent with the minimum concrete wall thicknesses of 2'.~~
* * *				
788	3.3.00.06b	6.b) The radwaste building waste accumulation ~~package waste storage~~ room has a volume greater than or equal to 1417 ~~1293~~ cubic feet.	An inspection of the radwaste building waste accumulation ~~package waste storage~~ room (5035~~1~~2) is performed.	The volume of the radwaste building waste accumulation ~~package waste storage~~ room (5035~~1~~2) is greater than or equal to 1417 ~~1293~~ cubic feet.

[VEGP Unit 4 COL, Appendix C, pg. C-428 & C-429]

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
783	3.3.00.04c	4.c) Deleted. ~~Walls of the packaged waste storage room in the radwaste building except for designed openings or penetrations provide shielding during normal operations.~~	~~Inspection of the as-built radwaste building wall thicknesses will be performed.~~	~~A report exists and concludes that the shield walls of the packaged waste storage room in the radwaste building except for the wall shared with the waste accumulation room and designed openings or penetrations are consistent with the minimum concrete wall thicknesses of 2'.~~
* * *				
788	3.3.00.06b	6.b) The radwaste building waste accumulation ~~package waste storage~~ room has a volume greater than or equal to 1417 ~~1293~~ cubic feet.	An inspection of the radwaste building waste accumulation ~~package waste storage~~ room (5035~~12~~) is performed.	The volume of the radwaste building waste accumulation ~~package waste storage~~ room (5035~~12~~) is greater than or equal to 1417 ~~1293~~ cubic feet.

{128}

Tier 1, Table 3.5-5

"Area Radiation Monitors"

(This change is also incorporated into VEGP Unit 3 and Unit 4 COLs, Appendix C)

[DCD Tier 1, pg. 3.5-4]

Table 3.5-5 Area Radiation Monitors	
Liquid and Gaseous Radwaste Area (1)	RMS-RY014

~~Note:~~

~~1. This monitor includes multiple detectors to monitor the areas of interest.~~

[VEGP Unit 3 COL, Appendix C, pg. C-445]

Table 3.5-5 Area Radiation Monitors	
Liquid and Gaseous Radwaste Area (1)	RMS-RY014

~~Note:~~

~~1. This monitor includes multiple detectors to monitor the areas of interest.~~

[VEGP Unit 4 COL, Appendix C, pg. C-445]

Table 3.5-5 Area Radiation Monitors	
Liquid and Gaseous Radwaste Area (1)	RMS-RY014

~~Note:~~

~~1. This monitor includes multiple detectors to monitor the areas of interest.~~

{128}

Tier 2, Table 3.2-2
"Seismic Classification of Building Structures"
[DCD Tier 2, pg. 3.2-19]

Revise selected table entries, as follows:

Table 3.2-2

SEISMIC CLASSIFICATION OF BUILDING STRUCTURES

Structure	Category (1)
Turbine Building – First bay adjacent to Nuclear Island outlined by Columns I.1 to R_1 ~~and~~ 11.05 to 11.2, and 11.02 to 11.2	C-II

{60}

Tier 2, Section 3.7.2.8.3
"Turbine Building"
[DCD Tier 2, pg. 3.7-18]

Revise the first paragraph, as follows:

The south end of the turbine building is separated from the rest of the turbine building by a 2'-0" thick reinforced concrete wall that provides a robust structure around the first bay. This wall isolates the first bay of the turbine building from the general area of the turbine building and from the adjacent yard area. The main segment of this wall is located on column line 11.2. This wall extends from El.100'-0" basemat to El. 169'-0" ~~the El. 161' 0" operating floor.~~ The first bay of the turbine building is classified as seismic Category II. The other bays are classified as non-seismic. The structure configuration is shown in Figure 3.7.2-20.

{14}

Tier 2, Section 9.4.8

"Radwaste Building HVAC System"

[DCD Tier 2, pg. 9.4-52]

Revise the first paragraph, as follows:

The radwaste building HVAC system serves the radwaste building which includes the clean electrical/mechanical equipment room and the potentially contaminated HVAC equipment room, ~~the packaged waste storage room,~~ the waste accumulation room, and the mobile systems facility.

{128}

Tier 2, Section 9.4.9.2.1.1
"General Area Heating and Ventilation"
[DCD Tier 2, pg. 9.4-58]

Revise the first paragraph, as follows:

Most of the turbine building is supplied by the general area ventilation and heating subsystem. Air is exhausted from the turbine building to the atmosphere by roof exhaust ventilators. The roof exhaust ventilators pull in outside air through wall louvers located at elevations 100'-0", 120'-6", and 141'-3" ~~117'-6", and 135'-3"~~. Wall louvers are located at the operating deck to provide additional air during plant outage operations. The general area heating subsystem uses hot water unit heaters to provide local heating throughout the turbine building. During heating operation, the general area ventilation system is not operated.

{14}

Tier 2, Section 9.4.9.2.1.2

"Electrical Equipment and Personnel Work Area HVAC"

[DCD Tier 2, pg. 9.4-58]

Revise the first and second paragraphs, as follows:

The electrical equipment, south bay equipment, and personnel work area air conditioning subsystem serves electrical equipment areas (switchgear rooms and the electrical equipment room), the south bay equipment (CCS pumps, BDS pumps, and reactor coolant pumps variable frequency drive power converter areas), and personnel work areas (secondary sampling laboratory, office space at elevation 158'-7" and 183' ~~149' and 174'~~). This subsystem is subdivided into three independent HVAC systems, one serving the electrical equipment areas, one serving the south bay equipment, and one serving the personnel work areas.

The electrical equipment HVAC system consists of two 50 percent capacity air handling units with a supply fan and a return air fan of about 16,500 scfm each, a ducted supply and return air system, automatic controls, and accessories. The air handling units are located on elevation 158'-7" ~~149' 0"~~ of the turbine building. The temperature of the rooms is maintained by thermostats which control the chilled water control valves for cooling and the integral face/bypass dampers for heating. Outside air is mixed with recirculated air to maintain a positive pressure.

{14}

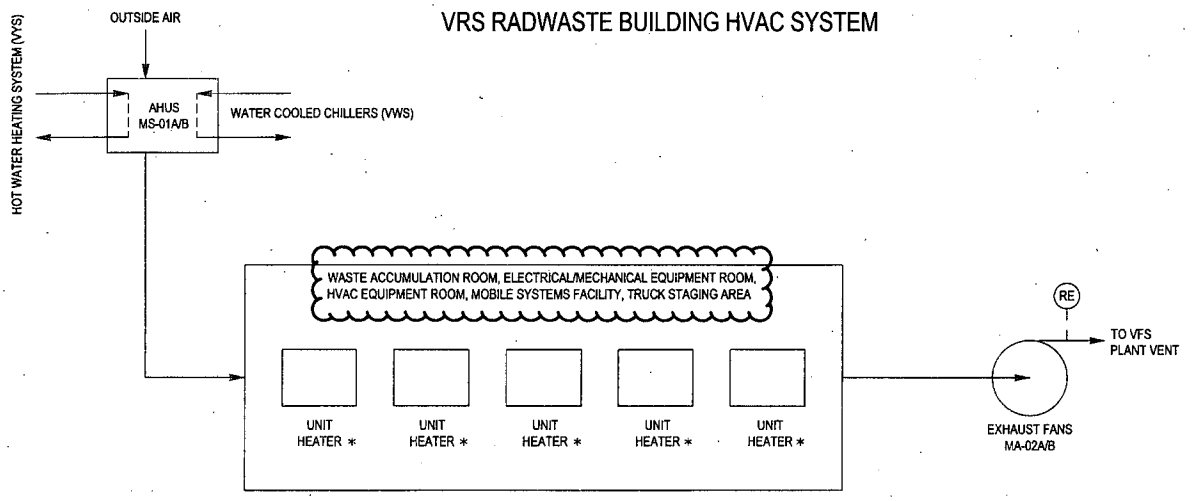

Figure 9.4.8-1

Radwaste Building HVAC System
(REF) VRS 001, 002, 003

Tier 2, Section 9A.3.2.1
"Fire Area 2000 AF 01"
[DCD Tier 2, pg. 9A-85 and 9A-86]

Revise selected text, as follows:

9A.3.2.1 Fire ~~Area~~ 2000 AF 01

* * *

Fire Zone	Room No.	
* * *		
• 2040 AF 20400	20400	Elevation 120'-6" ~~117'-6"~~ general floor area
* * *		
• 2050 AF 20500	20500	Elevation 141'-3" ~~135'-3"~~ general floor area
* * *		
• 2053 AF 20506	20505	Office area at 158' - 7" ~~149' - 0"~~
* * *		
• 2060 AF 20600	20600	Elevation 170'-0" ~~161'-0"~~ general floor area
• 2056~~0~~ AF 205~~6~~00	20505 ~~20603~~	Women's restroom
• 2056~~0~~ AF 205~~6~~00	20504 ~~20604~~	Men's restroom
* * *		
• 2063 AF 20602	20602	Office area/engineering workstation at elevation 183'-1 1/2 " ~~175'-1 1/2 "~~ * * *
• 2070 AF 20750	20750	Upper heater bay

Fire Detection and Suppression Features

* * *

Automatic suppression for the following equipment: the service water pumps, the start-up feedwater pumps and MCCs and control equipment at elevation 141'-3" ~~135'-3" (in the area defined by column 13.1 to 14 and P.1 to O)~~.

{14, 60}

Tier 2, Section 9A.3.2.4
"Fire Area 2009 AF 02"
[DCD Tier 2, pg. 9A-88]

Revise the first paragraph, as follows:

This elevator serving the turbine building from elevation 100'-0" to elevation 170'-0" ~~161'-0"~~ and its machine room are enclosed by fire barrier walls having a minimum rating of 2 hours. These nonstructural walls are metal lined gypsum board. The elevator machine room is above the elevator tower at elevation 196'-3" ~~171'-0"~~. There are no radioactive systems in this fire area.

{14}

Tier 2, Section 9A.3.2.7
"Fire Area 2009 AF 03"
[DCD Tier 2, pg. 9A-89]

Revise the first paragraph, as follows:

This stairwell serves the northwest portion of the turbine building from 158'-7" ~~149'-0"~~ to 196'-3" ~~187'-3"~~. The walls of this enclosure that are exposed to the turbine building interior are constructed with a concrete/steel composite material having a minimum fire rating of 2 hours. The walls of the enclosures that face the yard area would not be exposed to the turbine building interior; therefore, these outside walls are constructed with an exterior siding common to the overall siding used for the turbine building. There are no safety-related components or systems in this fire area that contain radioactive material. There are no systems in this fire area that contain radioactive material. The quantity of combustible materials in the stairwell is negligible, and no fire is postulated in this fire area. A fire protection hose riser is located in the stairwell with NFPA Class I hose connections at intermediate stair landings.

{14}

Tier 2, Section 9A.3.5.1
"Fire Area 5031 AF 01"
[DCD Tier 2, pg. 9A-118 & 9A-119]

Revise selected text, as follows:

9A.3.5.1 Fire Area 5031 AF 01

* * *

Fire Zone	Room No.	
~~• 5031 AF 50352~~	~~50352~~	~~Packaged waste storage room~~

Fire Detection and Suppression Features

- Fire detectors
- Preaction sprinklers (fire zones 5031 AF 50350 and ~~,~~ 50351~~, and 50352~~)
- Hose station(s)
- Portable fire extinguishers

{128}

Tier 2, Table 9A-3 (Sheet 12)

"Fire Protection Summary"

[DCD Tier 2, pg. 9A-155]

Revise selected table entries, as follows:

Table 9A-3 (Sheet 12 of 24)

FIRE PROTECTION SUMMARY

Fire Area/ Zone[1]	Safety Area?[2]	Floor Area Sq Ft	Combust. Material[3]	Fire Sev. Cat.	Amount	Heat Value (Btu)	Comb. Load, Btu/ Sq Ft	Equiv. Dur. (Min)	Boundary Fire Res.[4] (Hours)	Detect. Cap.	Fixed Suppression Capability[5]
2000 AF 01	NO										
2040 AF 20400			CABLE INS	C	87,800	9.0E+08				HEAT	WET PIPE
ELEVATION 120'-6" ~~117'-6"~~			LUBE OIL	E	1450	2.2E+08					SPRINKLERS
GENERAL FLOOR AREA			PLASTIC	D	6500	8.6E+07					HOSE STATION
			VOLATILES	E	180	2.4E+07					
			TRASH	B	1500	1.2E+07					
		42,606	NET CAT.	E	TOTAL	1.2E+09	28,170	21			
* * *											
2050 AF 20500			CABLE INS	C	87000	8.9E+08				HEAT	WET PIPE
ELEVATION 141'-3" ~~135'-3"~~			LUBE OIL	E	5400	8.2E+08					SPRINKLERS
GENERAL FLOOR AREA			PLASTIC	D	6000	7.9E+07					HOSE STATION
			VOLATILES	E	100	1.4E+07					
			HYDROGEN	E	50	7.6E+06					
			TRASH	B	50	3.9E+06					
		378900	NET CAT.	E	TOTAL	1.8E+09	47510	36			

{14}

Tier 2, Table 9A-3 (Sheet 13)

"Fire Protection Summary"

[DCD Tier 2, pg. 9A-156]

Revise selected table entries, as follows:

Table 9A-3 (Sheet 13 of 24)

FIRE PROTECTION SUMMARY

Fire Area/ Zone[1]	Safety Area?[2]	Floor Area Sq Ft	Combust. Material[3]	Fire Sev. Cat.	Amount	Heat Value (Btu)	Comb. Load, Btu/ Sq Ft	Equiv. Dur. (Min)	Boundary Fire Res. [4] (Hours)	Detect. Cap.	Fixed Suppression Capability [5]
2053 AF 20506			CABLE INS	C	720	7.2E+06				SMOKE	HOSE STATION
OFFICES AT 158'-7" ~~149'-0"~~			PLASTIC	D	900	1.2E+07					
			TRASH	B	50	4.0E+05					
			CLOTH	B	720	5.7E+06					
			PAPER	C	14000	1.1E+08					
			WOOD	C	1800	1.5E+07					
		3634	NET CAT.	D	TOTAL	1.5E+08	41400	39			
* * *											
2060 AF 20600			CABLE INS	C	1000	1.0E+07				HEAT	WET PIPE[7]
ELEVATION 170'-0" ~~161'-0"~~			LUBE OIL	E	250	3.8E+07					SPRINKLERS
GENERAL FLOOR AREA			PLASTIC	D	2500	3.3E+07					HOSE STATION
			VOLATILES	E	55	7.5E+06					
			TRASH	B	1000	7.7E+06					
		44042	NET CAT.	E	TOTAL	9.6E+07	2200	2			
* * *											

Tier 2, Table 9A-3 (Sheet 14)

"Fire Protection Summary"

[DCD Tier 2, pg. 9A-158]

Revise selected table entries, as follows:

Table 9A-3 (Sheet 14 of 24)

FIRE PROTECTION SUMMARY

Fire Area/ Zone[1]	Safety Area?[2]	Floor Area Sq Ft	Combust. Material[3]	Fire Sev. Cat.	Amount	Heat Value (Btu)	Comb. Load, Btu/ Sq Ft	Equiv. Dur. (Min)	Boundary Fire Res.[4] (Hours)	Detect. Cap.	Fixed Suppression Capability[5]
2151 AF 21581			CABLE INS	C	150	1.6E+06				SMOKE	HOSE STATION
SOUTH BAY 147'-6"			PLASTIC	D	250	3.3E+06					
UPPER VFD			TRASH	B	25	2.0E+05					
EQUIPMENT ROOM		2880	NET CAT.	D	TOTAL:	5.1E+06	1770	2			
2070 AF 20750			CABLE INS	C	500	2.0E+06				SMOKE	HOSE STATION
ELEVATION 228'-9"			LUBE OIL	E	50	7.6E+06					
UPPER HEATER BAY			PLASTIC	D	500	6.6E+06					
			VOLATILES	E	11	1.5E+06					
			TRASH	B	200	1.5E+06					
		8620	NET CAT.	E	TOTAL	1.9E+07	2200	2			
FIRE AREA TOTAL:		194,860 ~~186,240~~	NET CAT.	E	TOTAL	5.8E+09	29,862 ~~31,140~~	22 ~~23~~			

Tier 2, Table 9A-3 (Sheet 22)

"Fire Protection Summary"

[DCD Tier 2, pg. 9A-165]

Revise selected table entries, as follows:

Table 9A-3 (Sheet 22 of 24)

FIRE PROTECTION SUMMARY

Fire Area/ Zone[1]	Safety Area?[2]	Floor Area Sq Ft	Combust. Material[3]	Fire Sev. Cat.	Amount	Heat Value (Btu)	Comb. Load, Btu/ Sq Ft	Equiv. Dur. (Min)	Boundary Fire Res.[4] (Hours)	Detect. Cap.	Fixed Suppression Capability[5]
***											
5031 AF 50350			LUBE OIL	E	70	1.1E+07				HEAT	PREACTION
MOBILE SYSTEMS			LUBRICANT	E	20	4.0E+057					SPRINKLERS
FACILITY			CABLE INS	C	4300	4.4E+07					HOSE STATION
			CLOTH	B	70	5.6E+05					
			PLASTIC	D	250	3.3E+06					
			BATTERIES	A	1	2.0E+05					
			GASOLINE	E	60	7.7E+06					
			WOOD	C	400	3.4E+06					
			RUBBER	D	1400	1.7E+07					
			VOLATILES	E	10	1.4E+06					
			ACETYLENE	E	30	6.5E+05					
		6550 ~~6300~~	NET CAT.	E	TOTAL	8.9E+07	13,588 ~~14000~~	10 ~~11~~			
5031 AF 50351			LUBE OIL	E	300	4.5E+07				HEAT	PREACTION
WASTE ACCUMULATION			CABLE INS	C	2000 ~~1500~~	2.0 ~~1.5~~E+07					SPRINKLERS
ROOM			CLOTH	B	10000	8.0E+07					HOSE STATION
			PAPER	C	2500	1.9E+07					
			TRASH	B	31000	2.4E+08					
			PLASTIC	D	550 ~~500~~	7.3 ~~6.6~~E+06					
			WOOD	C	800 ~~400~~	6.7 ~~3.4~~E+06					
			RUBBER	D	500	6.1E+06					
			VOLATILES	E	10	1.4E+07					
		2310 ~~1500~~	NET CAT.	E	TOTAL	4.3E+08 ~~4.2E+08~~	184000 ~~277000~~	138 ~~208~~			

Tier 2, Table 9A-3 (Sheet 23)

"Fire Protection Summary"

[DCD Tier 2, pg. 9A-166]

Revise selected table entries, as follows:

Table 9A-3 (Sheet 23 of 24)

FIRE PROTECTION SUMMARY

Fire Area/ Zone[1]	Safety Area?[2]	Floor Area Sq Ft	Combust. Material[3]	Fire Sev. Cat.	Amount	Heat Value (Btu)	Comb. Load, Btu/ Sq Ft	Equiv. Dur. (Min)	Boundary Fire Res.[4] (Hours)	Detect. Cap.	Fixed Suppression Capability[5]
~~5031 AF 50352~~			~~CABLE INS~~	~~C~~	~~500~~	~~5.1E+06~~				~~HEAT~~	~~PREACTION~~
~~PACKAGED WASTE~~			~~PLASTIC~~	~~D~~	~~50~~	~~6.6E+05~~					~~SPRINKLERS~~
~~STORAGE ROOM~~			~~WOOD~~	~~C~~	~~400~~	~~3.4E+06~~					~~HOSE STATION~~
		~~810~~	~~NET CAT.~~	~~D~~	~~TOTAL~~	~~9.1E+06~~	~~11000~~	~~8~~			
* * *											
5031 AF 50355			CABLE INS	C	1600	1.6E+07					
MONITOR TANK			VOLATILES	E	40	5.4E+06					
ROOM			LUBE OIL	E	5	7.6E+05					
		~~1210~~ 960	NET CAT.	E	TOTAL	2.3E+07	~~18600~~ 23,958	~~14~~ 18			
FIRE AREA TOTAL:		12483	NET CAT.	E	TOTAL:	6.0E+08	48065 ~~47805~~	36			

{128}

Tier 2, Section 11.4.2.1

"Solid Waste Management, System Description, General Description"

[DCD Tier 2, pg. 11.4-4 and 11.4-5]

Revise the seventh paragraph, as follows:

The expected disposal volumes of wet and dry wastes are approximately 547 and 1417 cubic feet per year, respectively as shown in Table 11.4-1. The wet wastes shipping volumes include 510 cubic feet per year of spent ion exchange resins and deep bed filter activated carbon, 20 cubic feet of volume reduced liquid chemical wastes and 17 cubic feet of mixed liquid wastes. The spent resins and activated carbon are initially stored in the spent resin storage tanks located in the rail car bay of the auxiliary building. When a sufficient quantity has accumulated, the resin is sluiced into two 158 cubic feet high-integrity containers in anticipation of transport for offsite disposal. Liquid chemical wastes are reduced in volume and packaged into three 55-gallon drums per year (about 20 cubic feet) and are stored in the waste accumulation ~~packaged waste storage~~ room of the radwaste building. The mixed liquid wastes fill less than three drums per year (about 17 cubic feet per year) and are stored on containment pallets in the waste accumulation room of the radwaste building until shipped offsite for processing.

Revise the 10th and 11th paragraphs, as follows:

The dry solid radwaste includes 1383 cubic feet per year of compactible and non-compactible waste packed into about 14 boxes (90 cubic feet each) and ten drums per year. Drums are used for higher activity compactible and non-compactible wastes. Compactible waste includes HVAC exhaust filter, ground sheets, boot covers, hair nets, etc. Non-compactible waste includes about 60 cubic feet per year of dry activated carbon and other solids such as broken tools and wood. Solid mixed wastes will occupy 7.5 cubic feet per year (one drum). The low activity spent filter cartridges may be compacted to fill about 0.40 drums per year (3 ft^3/year) and are stored in the waste accumulation ~~packaged waste storage~~ room. Compaction is performed by mobile equipment or is performed offsite. High activity filter cartridges fill three drums per year (22.5 cubic feet per year) and are stored in portable processing or storage casks in the rail car of the auxiliary building.

The total volume of packaged radwaste to be stored in the radwaste building waste accumulation ~~packaged waste storage~~ room is 1417 cubic feet per year at the expected rate and 2544 cubic feet per year at the maximum rate. The compactible and non-compactible dry wastes, packaged in drums or steel boxes, are stored with the mixed liquid and mixed solid, volume reduced liquid chemical wastes, and the lower activity filter cartridges. The quantities of packaged liquid radwaste stored in the waste accumulation ~~packaged waste storage~~ room of the radwaste building consist of 20 cubic feet of chemical waste and 17 cubic feet of mixed liquid waste. The available useful storage volume for packaged waste in the waste accumulation ~~packaged waste storage~~ room is approximately 3900 cubic feet (10 feet deep, 30 feet long, and 13 feet high), which accommodates more than one full offsite waste shipment using a tractor-trailer truck. The waste accumulation ~~packaged waste storage~~ room provides storage for more than two years at the expected rate of generation and more than a year at the maximum rate of generation. One four-drum containment pallet provides more than 8 months of storage capacity for the liquid mixed wastes and the volume reduced liquid chemical wastes at the expected rate of generation and more than 4 months at the maximum rate.

Tier 2, Section 11.4.2.3.2

"Spent Filter Processing Operations"

[DCD Tier 2, pg. 11.4-10]

Revise the seventh paragraph of Section 11.4.2.3.2, as follows:

The drum covers are manually installed, and the drums are smear surveyed, decontaminated by wiping, if required, weighed, stacked on pallets, and placed in the waste accumulation ~~packaged waste storage~~ room.

{128}

Tier 2, Section 11.4.2.3.3

"Dry Waste Processing Operations"

[DCD Tier 2, pg. 11.4-10]

Revise the fifth paragraph, as follows:

Moderate-activity wastes (5 mR/hr to 100 mR/hr) are expected to be sorted in a mobile system to remove reusable items such as protective clothing articles and tools, hazardous wastes, and larger noncompressible items. The remaining wastes are normally compacted by mobile equipment. The packaged wastes may be loaded directly onto a truck for shipment or may be stored in the waste accumulation ~~packaged waste storage~~ room until a truck load quantity accumulates.

{128}

Tier 2, Section 11.4.2.5.2
"Radwaste Building"
[DCD Tier 2, pg. 11.4-13]

Revise the first, third, and fourth paragraphs, as follows:

The radwaste building, described in Section 1.2, houses the mobile systems facility and ~~. It also includes~~ the waste accumulation room~~ and the packaged waste storage room~~. These rooms are serviced by the mobile systems facility crane.

In the mobile systems facility, three truck bays provide for mobile or portable processing systems and for waste disposal container shipping and receiving. A shielded pipe trench to each of the truck bays is used to route liquid radwaste supply and return lines from the connections in the shielded pipe pit at the auxiliary building wall. Separate areas are reserved for empty (new) waste disposal container storage, container laydown, and forklift charging. An area is available near the door to the annex building for protective clothing dropoff and frisking.

The waste accumulation room ~~(pre-processing)~~ is divided as needed, using partitions and portable shielding to adjust the storage areas for different waste categories as needed to complement the radioactivity levels and volumes of generated wastes. The accumulation room also contains three 1000 cubic feet (10 feet x 10 feet x 10 feet) bunkers with removable shielding for moderate activity waste. High activity waste will be stored in these bunkers with additional temporary shielding. The accumulation room has lockable doors to minimize unauthorized entry and inadvertent exposure.

~~The packaged waste storage room may be separated into high- and low-activity areas, using portable shielding to minimize exposure while providing operational flexibility. A lockable door is provided to minimize unauthorized entry and radiation exposure.~~

The heating and ventilating system for the radwaste building is described in subsection 9.4.8.

{128}

Tier 2, Table 11.5-2

"Area Radiation Monitor Detector Parameters"

[DCD Tier 2, pg. 11.5-21]

Revise selected table entries, as follows:

Table 11.5-2

AREA RADIATION MONITOR DETECTOR PARAMETERS

Detector	Type	Service	Nominal Range
RMS-JE-RE014~~A~~	γ	Liquid and Gaseous Radwaste Area ~~1~~	1.0E-1 to 1.0E+4 mR/hr
~~RMS-JE-RE014B~~	~~γ~~	~~Liquid and Gaseous Radwaste Area 2~~	~~1.0E-1 to 1.0E+4 mR/hr~~

{128}

Tier 2, Section 12.3.2.2.5

"Radwaste Building Shielding Design"

[DCD Tier 2, pg. 12.3-13]

Revise the first paragraph, as follows:

Shielding is provided as necessary for the waste storage areas in the radwaste building to meet the radiation zone and access requirements. Depending on the equipment in the compartments, the radiation zoning varies from Zone I through IV as shown on the radiation zone drawing of Figure 12.3-1. Temporary partitions and shield walls will be provided, as required, to supplement the three bunkers that have removable shielding, and permanent shield walls surrounding the waste accumulation ~~and packaged waste storage~~ rooms inside the radwaste building.

{128}