



SEP 27 2013

Docket Nos.: 52-025  
52-026

ND-13-2116  
10 CFR 50.90  
10 CFR 52.63

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

Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Units 3 and 4  
Second Supplement to Request for License Amendment and Exemption:  
Liquid Radwaste System Consistency Changes (LAR-13-015S2)

Ladies and Gentlemen:

By letter ND-13-1602, dated August 6, 2013, in accordance with the provisions of 10 CFR 50.90, Southern Nuclear Operating Company (SNC), requested an amendment to the combined licenses (COLs) for Vogtle Electric Generating Plant (VEGP) Units 3 and 4 (License Numbers NPF-91 and NPF-92, respectively). This amendment request proposed to depart from approved Design Control Document (DCD) Tier 2 material that has been previously incorporated into the VEGP Units 3 and 4 Updated Final Safety Analysis Report (UFSAR) and involves associated departures from certified Tier 1 material. The license amendment also requested a revision to the associated material that has been included in Appendix C of the VEGP Units 3 and 4 COLs. Pursuant to 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, AP1000 Design Certification Rule was also requested for the plant-specific DCD Tier 1 material departures. SNC supplemented LAR-13-015 by letter dated September 16, 2013 based on discussions held with the NRC Staff reviewers in a public meeting on September 5, 2013.

This second supplement to LAR-13-015 is provided to address comments provided by the NRC Staff reviewers in a public meeting on September 26, 2013. To address the comments related to Item 3 in LAR-13-015S, Enclosure 4, SNC confirmed the valve type should have been identified as plug valves instead of needle valves and that the system designations for two valves on that same page (Enclosure 4, page 14 of 17) should have been identified as Liquid Radwaste System (WLS) instead of Chemical and Volume Control System (CVS). SNC is also providing additional text in the discussion of the proposed location of the safety classification break relative to the existing safety classification break location in Enclosure 1 of the original LAR. The revised information in Enclosure 5 supplements the information provided in Enclosures 1, 2, 3 and 4 of SNC letters ND-13-1602 and ND-13-1985.

The information provided in Enclosure 5 does not change the scope of the requested license amendment, nor does it change the conclusions in the Technical Evaluation or the conclusions in the Significant Hazards Consideration Determination. This letter contains no regulatory commitments.

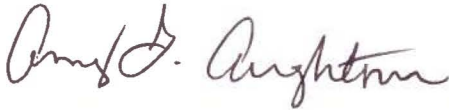
In accordance with 10 CFR 50.91, SNC is notifying the State of Georgia of this LAR supplement by transmitting a copy of this letter and enclosure to the designated State Official.

Should you have any questions, please contact Mr. Brian Meadors at (205) 992-7331.

Ms. Amy G. Aughtman states that she is a Licensing Manager of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and to the best of her knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



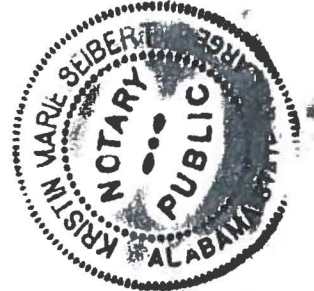
A. G. Aughtman

AGAWES/kms

Sworn to and subscribed before me this 27<sup>th</sup> day of September, 2013

Notary Public: Kristin Marie Seibert

My commission expires: August 16, 2016



Enclosure 5: Vogtle Electric Generating Plant (VEGP) Units 3 and 4, Second Supplement to Request for License Amendment and Exemption Regarding Liquid Radwaste System Consistency Changes (LAR-13-015S2)

cc:

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**Southern Nuclear Operating Company**

**ND-13-2116**

**Enclosure 5**

**Vogtle Electric Generating Plant (VEGP) Units 3 and 4**

**Second Supplement to  
Request for License Amendment and Exemption  
Liquid Radwaste System Regarding Consistency Changes  
(LAR-13-015S2)**

**Notes:**

- **Enclosures 1, 2 & 3 were provided with the original LAR submittal on August 6, 2013**
- **Enclosure 4 was provided with the first supplement to the original LAR on September 16, 2013.**

**(4 pages, including this Cover Page)**

With this supplement, Southern Nuclear Operating Company (SNC) responds to NRC comments provided in a public meeting/call held on September 26, 2013 regarding SNC Letters ND-13-1602 and ND-13-1985, Request for License Amendment and Exemption Regarding Liquid Radwaste System Consistency Changes. SNC confirmed the valve type discussed in Item 3 of Enclosure 4 should have been identified as plug valves instead of needle valves and that the system designations for two valves on that same page (Enclosure 4, page 14 of 17) should have been identified as Liquid Radwaste System (WLS) instead of Chemical and Volume Control System (CVS). SNC is also providing additional text in the discussion of the proposed location of the safety classification break relative to the existing safety classification break location.

The specifics of the changes to ND-13-1985, Enclosures 4 are provided below.

1. Item 3. Missing Valve Operators (Page 14 of 17)

The SNC Response is revised from:

SNC confirms that pneumatic valve operators should be shown on the two needle valves (i.e., WLS-PL-V055 and WLS-PL-V057) on Tier 2 Figure 11.2-1. These valve operators were inadvertently omitted from the mark-up of Figure 11.2-1 when the valves were changed from plug valves to needle valves in this figure. Because the operators are currently shown on these valves in Figure 11.2-1, and there was no discussion of removing the operators in letter ND-13-1602, the only change required by this response is a revision to Tier 2 Figure 11.2-1 to return the depiction of these operators.

To read:

SNC confirms that pneumatic valve operators should be shown on the two plug valves (i.e., WLS-PL-V055 and WLS-PL-V057) on Tier 2 Figure 11.2-1. These valve operators were inadvertently omitted from the mark-up of Figure 11.2-1 when the valves were changed from diaphragm valves to plug valves in this figure. Because the operators are currently shown on these valves in Figure 11.2-1, and there was no discussion of removing the operators in letter ND-13-1602, the only change required by this response is a revision to Tier 2 Figure 11.2-1 to return the depiction of these operators.

2. Enclosure 3 Licensing Basis Documents-Proposed Changes) Change (Page 14 of 17)

The SNC write up is revised from:

The lower left-hand corner of Figure 11.2-1 is revised to correctly depict pneumatic operators on the two needle valves (CVS-PL-V055 and CVS-PL-V057) in the header between the discharge of the containment sump pumps and the waste holdup tanks, as shown in the revised figure on the next page and the detail on the page following the full revised figure.

2. Continued

To read:

The lower left-hand corner of Figure 11.2-1 is revised to correctly depict pneumatic operators on the two plug valves (WLS-PL-V055 and WLS-PL-V057) in the header between the discharge of the containment sump pumps and the waste holdup tanks, as shown in the revised figure on the next page and the detail on the page following the full revised figure.

The specifics of the changes to ND-13-1602, Enclosure 1 (License Amendment Request) is provided below:

1. Enclosure 1 Section 2.1 PXS and CVS Compartment Drain Hub Classification

The SNC write-up is revised from:

The safety classification break is specifically identified on Figure 11.2-2 (Sheet 1) at the downstream side of the second of two WLS check valves from each of the three compartment drains. The compartment drain hubs are located on the upstream side of the first of the two check valves and since there is no identification of the safety classification break between the drain hubs and the first check valves, the drain hubs could be interpreted as having the same safety classification as the drain piping and check valves. This is not consistent with the intended design in that the compartment drain hubs perform no safety-related function.

To read:

Currently a safety classification break is specifically identified on Figure 11.2-2 (Sheet 1) at the downstream side of the second of two WLS check valves from each of the three compartment drains, however no safety classification break is identified on the upstream side of those same valves. The compartment drain hubs are located on the upstream side of the first of the two check valves and since there is no identification of the safety classification break between the drain hubs and the first check valves, the drain hubs could be interpreted as having the same safety classification as the drain piping and check valves. This is not consistent with the intended design in that the compartment drain hubs perform no safety-related function.

2. Enclosure 1, Section 2.1 PXS and CVS Compartment Drain Hub Classification

The SNC write-up for the Description of Proposed Change in item 1 of Table 1 is revised from:

Add safety class break from AP1000 Class C to Non- Nuclear Safety (NNS) between the CVS and PXS compartment drain hubs and the drain lines by adding the drawing symbol "N/3" to indicate the drain hubs are nonsafety-related while the drain piping to the downstream side of the second check valve remains ASME Section III, Class 3.

To read:

Add safety class break from AP1000 Class C to Non- Nuclear Safety (NNS) between the CVS and PXS compartment drain hubs and the drain lines including two check valves by adding the drawing symbol "N/3" to indicate the drain hubs are nonsafety-related while the drain piping to the downstream side of the second check valve remains ASME Section III, Class 3.

3. Enclosure 1, Section 2.1 PXS and CVS Compartment Drain Hub Classification

The SNC write-up for the Description of Proposed Change in item 4 of Table 1 is revised from:

Indicate safety class break from NNS (AP1000 Class D) to AP1000 Class C (ASME Section III, Class 3) between the CVS and PXS compartment drain hubs and drain lines along with a corresponding note.

To read:

Indicate safety class break from NNS (AP1000 Class D) to AP1000 Class C (ASME Section III, Class 3) between the CVS and PXS compartment drain hubs and drain lines including two check valves along with a corresponding note.