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Operating Company, Inc.
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SOUTHERN COMPANY

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

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4
Request for License Amendment and Exemption:
Tier 1 Editorial and Consistency Changes (LAR-13-017)

Ladies and Gentlemen:

In accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC), the licensee for Vogtle Electric Generating Plant (VEGP) Units 3 and 4, requests an amendment to Combined Licenses (COL) Numbers NPF-91 and NPF-92, for VEGP Units 3 and 4, respectively. This amendment request proposes to depart from certified AP1000 Design Control Document (DCD) Tier 1 material, and to revise the associated material included in Appendix C of each 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, design certification rule is also requested for these plant-specific DCD Tier 1 material departures.

The proposed departures consist of changes to various plant-specific Tier 1 (and COL Appendix C) information to correct editorial errors and achieve consistency with the Updated Final Safety Analysis Report (Tier 2 information).

Enclosure 1 provides the description, technical evaluation, regulatory evaluation (including the Significant Hazards Consideration determination), and environmental considerations for the requested license amendment. Enclosure 2 provides the background and supporting basis for the requested exemption. Enclosure 3 provides markups depicting the requested changes to plant-specific Tier 1 and VEGP Units 3 and 4 COL Appendix C text, tables, and figures.

The changes proposed in this License Amendment Request are consistent in technical content with License Amendment Request LAR 13-25, submitted by South Carolina Electric & Gas Company (SCE&G) on July 2, 2013, as supplemented on September 26, 2013, and accepted by the NRC for review on September 18, 2013.

This letter contains no regulatory commitments.

SNC requests staff approval of the license amendment and associated exemption by November 1, 2014, to allow the installation of piping to equipment and modules on Elevation 135'-3". Delayed approval of this license amendment may result in a delay in this construction activity. SNC expects to implement the proposed amendment (through incorporation into the affected licensing basis documents) within 30 days of approval of the requested changes.

In accordance with 10 CFR 50.91, SNC is notifying the State of Georgia of this LAR by transmitting a copy of this letter and enclosures 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

Amy G. Aughtman

A. G. Aughtman

AGA/NH/kms

Sworn to and subscribed before me this 4th day of November, 2013

Notary Public: Kristin Marie Seibert

My commission expires: August 16, 2016

Enclosures: 1) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 - Request for License Amendment Regarding Tier 1 Editorial and Consistency Changes (LAR-13-017)
2) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Exemption Request Regarding Tier 1 Editorial and Consistency Changes (LAR-13-017)
3) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Proposed Changes to Licensing Basis Documents (LAR-13-017)

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Southern Nuclear Operating Company

Vogtle Electric Generating Plant Units 3 and 4

ND-13-2178

Enclosure 1

Request for License Amendment Regarding Tier 1 Editorial and Consistency Changes (LAR-13-017)

Table of Contents

Pursuant to 10 CFR 50.90, Southern Nuclear Operating Company (SNC) hereby requests an amendment to Combined License (COL) Numbers NPF-91 and NPF-92 for the Vogtle Electric Generating Plant, Units 3 and 4, respectively.

1. Summary Description

The proposed amendment would depart from plant-specific Design Control Document (DCD) by making various non-technical changes to plant-specific Tier 1 information. The proposed changes would correct editorial errors (e.g., typing, clerical, spelling, data entry, wrong tag numbers) and consistency errors (e.g., inconsistencies between design documents and plant-specific Tier 1 information, inconsistencies between UFSAR (Tier 2) and Tier 1 information, and/or inconsistencies between Tier 1 information from different locations within Tier 1). No structure, system, component (SSC), design function or analysis as described in the UFSAR would be affected. The Tier 1 changes also involve proposed changes to corresponding information in Appendix C of the COLs.

This enclosure requests approval of the license amendment necessary to implement the proposed changes to the Tier 1 material, and the corresponding material incorporated into Appendix C of the COL. There are no UFSAR changes associated with these plant-specific Tier 1 changes.

2. Detailed Description and Technical Evaluation

Updated Final Safety Analysis Report (UFSAR) (Tier 2) design descriptions are derived from plant design documents. 10 CFR 52, Appendix D, Section II.D states that Tier 1 design information is "derived from Tier 2 information." However, certain specific examples have been identified in which plant-specific Tier 1 information is not consistent with its associated UFSAR design information. In each of the proposed changes described and evaluated below, the UFSAR design information is correct and consistent with the actual design, therefore the following Tier 1 corrections are proposed to promote consistency. The changes below are considered editorial and consistency corrections. None of the changes result in physical changes to the plant or changes to the original design function of the plant.

(a) Tag Number Updates

UFSAR Table 3.2-3 correctly identifies the Main Control Room (MCR) Emergency Habitability System (VES) Relief Dampers tag numbers as VES-MD-D001A and –D001B, and the tag number for the MCR Air Filtration Line Eductor as VES-PY-N01. In contrast, plant-specific Tier 1 Figure 2.2.5-1 incorrectly identifies the dampers' tag numbers as VES-PY-D001A and D001B, and the eductor's tag number as VES-FY-N01. To resolve these inconsistencies, changes are proposed to update the tag numbers identified in Tier 1 Figure 2.2.5-1 from "VES-PY-D001A" to "VES-MD-D001A," from "VES-PY-D001B" to "VES-MD-D001B," and from "VES-FY-N01" to "VES-PY-N01."

UFSAR Tables 3.7-1 and 3.11-1 correctly identify the Class 1E dc and Uninterruptible Power Supply System (IDS) Division C 250 Vdc Distribution Panel tag number as IDSC-DD-1. In

contrast, plant-specific Tier 1 Table 2.6.3-4 incorrectly identifies the IDS Division C 250 Vdc Distribution Panel tag number as IDSC-DD-2. To resolve this inconsistency, a change is proposed to update the IDS Division C 250 Vdc Distribution Panel tag number in plant-specific Tier 1 Table 2.6.3-4 from "IDSC-DD-2" to "IDSC-DD-1."

UFSAR Subsection 11.5.2.3.3, UFSAR Table 11.5-1 and plant-specific Tier 1 Tables 3.5-3 and 3.5-7, correctly identify plant vent radiation monitors with a final designation of "RE###." In contrast, Tier 1 Tables 3.5-3 and 3.5-7 incorrectly identify a turbine island vent Effluent Radiation Monitor, which is a plant vent radiation monitor, with the tag number "TDS-RY001." To resolve this inconsistency, a change is proposed to correct the tag number for the turbine island vent effluent radiation monitor in Tier 1 Tables 3.5-3 and 3.5-7 from "TDS-RY001" to "TDS-RE001."

These changes do not involve a technical (design, analysis, function or qualification) change, (i.e., there is no change to an associated calculation, design parameter or design requirement.)

(b) Diverse Actuation System Update

UFSAR Figure 7.2-1 (Sheet 20) for Diverse Actuation System (DAS) logic automatic actuations and UFSAR Figure 7.2-1 (Sheet 21) for DAS manual actuations correctly do not show a Passive Core Cooling System (PXS) function being controlled by the DAS. In contrast, plant-specific Tier 1 Table 2.2.3-1 indicates two PXS valves (PXS-PL-V117A and V117B) as being controlled by the DAS. UFSAR and PXS design documents show that these valves are not controlled by DAS. The DAS is not needed to control these motor-operated valves (MOVs), because they are in their fail-safe position during normal plant operation. The valves do not perform any active (automatic or manual) safety-related function. To resolve this inaccuracy, a change is proposed to update the "Control PMS/DAS" entries in Tier 1 Table 2.2.3-1 from "Yes/Yes" to "Yes/No." Because these MOVs are in their fail-safe positions during normal operations and are not modified by this activity, no safety function is adversely affected. This change does not involve a technical (design, analysis, function or qualification) change.

The purpose of DAS, as stated in the AP1000 NRC Final Safety Evaluation Report (FSER) , NUREG-1793, is consistent with the above requested plant-specific Tier 1 changes. FSER Section 7.1.5, Instrumentation & Control System Architecture states, "The diverse actuation system (DAS) provides a backup to the PMS (safety monitoring system) for some specific diverse automatic or manual actuation." Because subject valves are not required to have any change of state during or following an accident, there is no automatic or manual actuation for DAS to perform. Therefore, the proposed change to indicate the inapplicability of DAS for the two PXS valves, PXS-PL-V117A and V117B, is consistent with the AP1000 FSER.

(c) Containment Atmosphere Radiation Monitor (PSS) Identified Function Update

UFSAR Subsection 11.5.2.3.1 correctly refers to Containment Atmosphere Radiation Monitor, RE027, as a "particulate" monitor. In contrast, PSS-RE027 is labeled as a "gaseous" monitor in plant-specific Tier 1 Tables 3.5-1 and 3.5-7. To resolve this inconsistency, a change is proposed to update Tier 1 Tables 3.5-1 and 3.5-7 to identify that

PSS-RE027 as a “particulate” monitor. Tier 1 Tables 3.5-1 and 3.5-7 identify the gaseous monitoring function as being provided by monitor PSS-RE026. The proposed change to Tier 1 Tables 3.5-1 and 3.5-7 provides consistency between the Tier 1 and 2 design commitments for gaseous and particulate. These changes do not involve a technical (design, analysis, function or qualification) change.

The AP1000 FSER, NUREG-1793, Supplement 2, Section 23.F.3 also refers to RE027 as a “particulate” radiation monitor, thus the proposed plant-specific Tier 1 change is consistent with the AP1000 FSER.

(d) Passive Core Cooling System Accumulator Name Update

UFSAR Subsection 9A.3.1.1.4 correctly refers to “Passive core cooling system valve/accumulator room B.” In plant-specific Tier 1 Table 3.3-6, ITAAC Item 5.c, the Design Commitment and Inspections, Tests, Analyses and Acceptance Criteria columns correctly refer to a “PXS valve/accumulator” in five locations. However, the Acceptance Criteria for PXS Valve/Accumulator Room B (11207) incorrectly refers to "PXS/Accumulator." To resolve this inconsistency, a change is proposed to update the name for the Room B accumulator to read “PXS Valve/Accumulator.” This change does not involve a technical (design, analysis, function or qualification) change.

(e) Inspections, Tests, Analyses Subject Clarification

Plant-specific Tier 1 Table 2.7.1-2 (which refers to [piping] lines) and Table 2.7.1-4, ITAAC Item 2.b, Design Commitment and Acceptance Criteria columns correctly address “piping.” However, the Table 2.7.1-4 Inspections, Tests, Analyses column addresses the "components." To resolve this inconsistency, a change is proposed to update the Table 2.7.1-4, Item 2.b, Inspections, Tests, Analyses column to address “piping” rather than “components.” This change does not involve a technical (design, analysis, function or qualification) change.

(f) Clarifications to Identify Open Raceways

Consistent with the plant design, UFSAR Subsection 8.3.2.4.2 states “For configurations involving an enclosed raceway and an open raceway, the minimum vertical separation is 1 inch if the enclosed raceway is below the open raceway.” This spatial separation criterion is correctly reflected in plant-specific Tier 1 Table 3.3-6, ITAAC 7.d), Inspections, Tests, Analyses, Item ii) 4), which states, “For configurations involving an enclosed raceway and an open raceway, the minimum vertical separation is 1 inch if the enclosed raceway is below the open raceway.” However, the texts of three associated Acceptance Criteria are not consistent with the Inspections, Tests, Analyses wording.

- Acceptance Criterion ii.a) Item 4) states “For configurations that involve an enclosed raceway and an open raceway, the minimum vertical separation is 1 inch if the enclosed raceway is below the raceway.” To resolve this inconsistency, a change is proposed to add the word “open” before the last “raceway.”

- Acceptance Criterion ii.b) Item 4) states “For configurations that involve an enclosed raceway, the minimum vertical separation is 1 inch if the enclosed raceway is below the raceway.” To resolve this inconsistency, a change is proposed to clarify this

statement to read “For configurations that involve an enclosed raceway and an open raceway, the minimum vertical separation is 1 inch if the enclosed raceway is below the open raceway.”

- Acceptance Criterion ii.c) Item 4) states “For configurations that involve an enclosed raceway and an open raceway, the minimum vertical separation is 1 inch if the enclosed raceway is below the raceway.” To resolve this inconsistency, a change is proposed to add the word “open” before the last “raceway.”

These changes do not involve a technical (design, analysis, function or qualification) change, i.e., there is no change to an associated calculation, design parameter or design requirement.

(g) Grounding and Lightning Protection System ITAAC Table Spelling Errors

UFSAR Subsections 8.3.1.1.7, Grounding System, and 8.3.1.1.8, Lightning Protection, are the basis for plant-specific Tier 1 Section 2.6.6, Grounding and Lightning Protection System. However, Tier 1 Table 2.6.6-1 ITAAC, Design Commitment 1, item (3) and Acceptance Criterion iv) each refer to “lighting protection” instead of “lightning protection.” To resolve these clerical errors, changes are proposed to update Design Commitment 1, item (3) and Acceptance Criterion iv) to refer to "lightning" rather than "lighting". These changes do not involve a technical (design, analysis, function or qualification) change.

(h) Passive Core Cooling System Table Typing Error

The Passive Core Cooling System (PXS) is addressed in plant-specific Tier 1 Section 2.2.3 and its associated tables. Tier 1 Table 2.2.3-4, ITAAC 8.c), in the Inspections, Tests, Analyses column, Item xii) incorrectly refers to the CMT level sensors with the abbreviation “PSX” instead of “PXS.” To resolve this editorial error, a change is proposed to correct the system identifier in Tier 1 Table 2.2.3-4, ITAAC 8.c) in the Inspections, Tests, Analyses column, Item xii), from “PSX” to “PXS.” This change does not involve a technical (design, analysis, function or qualification) change.

(i) Deleting Non-ASME Code Section III Lines from an ASME Code Section III Table

Plant-specific Tier 1 Table 2.3.10-2 lists the liquid radwaste system (WLS) piping that is designed and constructed in accordance with ASME Code Section III requirements. Table 2.3.10-2 includes lines WLS-PL-L020, WSL-PL-L077 [sic], WLS-PL-L078, and WLS-PL-L079 as ASME-III Code lines. Per UFSAR Section 3.2.2, these four lines do not meet the criteria to be classified as safety-related Class A, B or C (NRC Quality Groups A, B and C, respectively) and supplied as ASME Code Section III. None of the lines performs a safety-related function or is required to remain functional following the initiation of an accident. Design documentation indicates the four lines are nominal pressure rated as Class 150, ASME B16.5, design code ASME B31.1, and NRC Quality Group D. The design documentation is consistent with UFSAR Subsection 3.2.2.6, which specifies that nonsafety-related Class D lines are to be supplied to typical industry standards such as B31.1. The ASME Code classifications for these four WLS piping lines are not provided in the UFSAR. Furthermore, these four lines are not identified in the list of WLS lines in Tier 1 Table 2.2.1-2 as ASME Code Section III lines. Therefore, Tier 1 Table 2.2.1-2 is consistent with the design documentation. To maintain consistency with both the design documentation and

the Tier 1 Table 2.2.1-2 information, it is proposed that the four lines be removed from Tier 1 Table 2.3.10-2.

(j) Clarifying the Scope of an ITAAC Line Item

For the AP1000, there is no credible spent fuel transport scenario that could drop a spent fuel assembly over the new fuel rack. UFSAR Subsection 9.1.1.2.1, Item C. states "Because the likelihood of a new fuel assembly being dropped into the new fuel pit and onto the new fuel racks is minimal, it is unnecessary to evaluate drop scenarios for the new fuel storage rack." Therefore, it is unnecessary to analyze whether the new fuel storage racks can withstand the impact of either a dropped new fuel assembly or a dropped spent fuel assembly. This is supported by plant-specific Tier 1 Table 2.1.1-1, Design Commitment Item 7, which only requires design basis [analysis for] dropped spent fuel assembly accidents over the spent fuel racks." However, in both the Inspections, Tests, Analyses and Acceptance Criteria columns for the associated ITAAC, ITAAC Item 7.iv, the wording refers to an analysis of the "new and spent fuel" storage racks under design basis dropped spent fuel assembly loads. Because it is unnecessary to evaluate, there is no analysis for a spent fuel drop on the new fuel rack. Therefore, to align the ITAAC with the associated Design Commitment and the UFSAR, it is proposed that the ITAAC wording of both statements for ITAAC Item 7.iv be clarified to remove the words "new and" before each portion of the statement regarding the spent fuel storage racks.

(k) Editorial change to correct the title of a document in a Design Description

The complete title of report APP-OCS-GEH-520 is "AP1000 Plant Startup Human Factors Engineering Design Verification Plan." However, in plant-specific Tier 1 Section 3.2, Item 1.e) this title reads "AP1000 Plant Startup Human Factors Engineering Verification Plan." Thus, the current plant-specific Tier 1 version is missing the word "Design." Therefore, it is proposed that in Tier 1 Section 3.2, Item 1.e), the title of report APP-OCS-GEH-520 be updated by inserting "Design" before "Verification." This change does not involve a technical (design, analysis, function or qualification) change, i.e., there is no change to an associated calculation, design parameter or design requirement.

Note: There is no UFSAR change associated with any of the above plant-specific Tier 1 changes.

This departure is an editorial and consistency "cleanup" of the plant-specific Tier 1 material, and would make no technical change (i.e., existing design is unaffected), and would facilitate consistency between UFSAR (Tier 2) and Tier 1 design descriptions, tables and figures. No structure, system, component (SSC), design function or analysis as described in the UFSAR would be affected. No defense-in-depth safety function would be affected. No plant-specific ITAAC line item would be technically changed.

The requested changes only involve correcting editorial, clerical and consistency errors, making nomenclature updates, updating equipment identifications (e.g., tag numbers), deleting unnecessary entries (which originally should not have been included) in plant-specific Tier 1 tables, and making clarifications. Therefore, no design function as described in the UFSAR would be affected.

The plant-specific Tier 1 information is the design information and functions subject to verification by the Tier 1 ITAAC closure process. The requested changes would neither adversely affect the ability to meet design criteria or functions, nor involve a decrease in the safety provided by the associated systems. Tier 1 information and ITAAC would continue to adequately validate their corresponding UFSAR design commitments because these are editorial and consistency changes.

The proposed changes do not affect a feature used for the prevention or mitigation of accidents or their safety / design analyses. The proposed changes do not affect any SSC accident initiator or initiating sequence of events. The proposed changes do not affect any safety-related SSC or function used to mitigate an accident.

The proposed changes do not involve a change to a fission product barrier. The proposed changes cannot result in a new failure mode, malfunction or sequence of events that could affect safety. The proposed changes would 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.

The proposed changes do not affect any safety-related equipment, design code limit, safety-related function, safety-related design analysis, safety analysis input or result, or design or safety margin. Therefore, no safety analysis or design basis acceptance limit or criterion would be challenged or exceeded.

This license amendment request does not involve a technical (design, analysis, function or qualification) change, thus none of the associated SSCs used to contain, control, channel, monitor, process, or release radioactive or non-radioactive materials is affected. No effluent release path is involved. The proposed changes do not involve changing a type or quantity of an expected effluent. Therefore, no radioactive or non-radioactive material effluent is affected.

Plant radiation zones, controls under 10 CFR 20, and expected amounts and types of radioactive materials are not affected by the proposed changes. Therefore, individual and cumulative radiation exposures would not change.

3. Technical Evaluation

Included in Section 2.

4. Regulatory Evaluation

4.1 Applicable Regulatory Requirements/Criteria

10 CFR 52.98(f) requires NRC approval for any modification to, addition to, or deletion from the terms and conditions of a COL. This activity involves a departure from plant-specific Tier 1 information, and a corresponding change to COL Appendix C, Inspections, Tests, Analyses and Acceptance Criteria information; therefore, this

activity requires a proposed amendment to the COL. Accordingly, NRC approval is required prior to making the plant-specific changes in this license amendment request.

4.2 Precedent

No precedent is identified.

4.3 Significant Hazards Consideration

The proposed change would amend Combined License Nos. NPF-91 and NPF-92 for VEGP Units 3 and 4 by departing from the Combined License Appendix C information. The changes correct editorial errors and promote consistency with the Updated Final Safety Analysis Report Tier 2 information.

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:

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

Response: No

The proposed editorial and consistency Combined License (COL) Appendix C update does not involve a technical change, e.g., there is no design parameter or requirement, calculation, analysis, function or qualification change. No structure, system, component (SSC) design or function would be affected. No design or safety analysis would be affected. The proposed changes do not affect any accident initiating event or component failure, thus the probabilities of the accidents previously evaluated are not affected. No function used to mitigate a radioactive material release and no radioactive material release source term is involved, thus the radiological releases in the accident analyses are not affected.

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

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

Response: No

The proposed editorial and consistency COL Appendix C update would not affect the design or function of any SSC, but will instead provide consistency between the SSC designs and functions currently presented in the Updated Final Safety Analysis Report (UFSAR) and the COL Appendix C information. The proposed (non-technical) changes would not introduce a new failure mode, fault or sequence of events that could result in a radioactive material release.

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

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

Response: No

The proposed editorial and consistency COL Appendix C update is non-technical, thus would not affect any design parameter, function or analysis. There would be no change to an existing design basis, design function, regulatory criterion, or analysis. No safety analysis or design basis acceptance limit/criterion is involved.

Therefore, the proposed amendment 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.

4.4 Conclusions

Based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public. The above evaluations demonstrate that the proposed changes can be accommodated without an increase in the probability or consequences of an accident previously evaluated, without creating the possibility of a new or different kind of accident from any accident previously evaluated, and without a significant reduction in a margin of safety. Having arrived at negative declarations with regard to the criteria of 10 CFR 50.92, this assessment determined that the proposed change does not involve a Significant Hazards Consideration.

5. Environmental Consideration

The proposed change would amend the Combined License (COL) Nos. NPF-91 and NPF-92 for VEGP Units 3 and 4 by departing from the Combined License Appendix C information. The changes correct editorial errors and promote consistency with the Updated Final Safety Analysis Report Tier 2 information.

The Licensee has determined that the anticipated construction and operational effects of the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9), in that:

(i) There is no significant hazards consideration.

As documented in Section 4.3, Significant Hazards Consideration, of this license amendment request, 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 editorial and consistency COL Appendix C update would not affect the design or function of any structure, system, component (SSC), but would instead provide consistency between the SSC designs and functions currently presented in the UFSAR and the COL Appendix C information. The proposed amendment does not involve any design change. The proposed changes are unrelated to any aspect of plant construction or operation that would introduce any change 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. Furthermore, the proposed changes do not affect any effluent release path or 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 clarification and editorial changes do not affect any area of the plant or plant system. Plant radiation zones (in UFSAR Section 12.3) are not affected, and controls under 10 CFR 20 preclude a significant increase in occupational radiation exposure. Therefore, 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, it has been determined that anticipated construction and operational affects of 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 exemption is not required.

6. References

None

Southern Nuclear Operating Company

Vogtle Electric Generating Plant Units 3 and 4

NND-13-2178

Enclosure 2

Exemption Request
Regarding
Tier 1 Editorial and Consistency Changes

(LAR-13-017)

1.0 Purpose

Southern Nuclear Operating Company (SNC) requests a permanent exemption from the provisions of 10 CFR Part 52, Appendix D, Section III.B, "Design Certification Rule for the AP1000 Design, Scope and Contents," to allow a departure from elements of the certification information in Tier 1 of the Generic Design Control Document (DCD). The regulation, 10 CFR Part 52, Appendix D, Section III.B, requires an applicant or licensee referencing Appendix D to 10 CFR Part 52 to incorporate by reference and comply with the requirements of Appendix D, including certification information in DCD Tier 1. The Tier 1 information for which a plant-specific departure and exemption is being requested includes various information specified in Tier 1 tables as well as Tier 1 design description information.

This request for exemption will apply the requirements of 10 CFR Part 52, Appendix D, Section VIII.A.4 to allow departures from generic Tier 1 information due to the following proposed changes to the system and non-system based design descriptions.

- Tier 1 Figure 2.2.5-1
  - Change Main Control Room (MCR) Emergency Habitability System (VES) relief damper tag numbers from VES-PY-D001A to VES-MD-D001A and from VES-PY-D001B to VES-MD-D001B.
  - Change the MCR Air Filtration Line Eductor tag number from VES-FY-N01 to VES-PY-N01.

- Tier 1 Table 2.6.3-4
  - Change distribution panel tag number from IDSC-DD-2 to IDSC-DD-1.

- Tier 1 Table 3.5-3
  - Correct turbine island vent effluent radiation monitor tag from TDS-RY001 to TDS-RE001.

- Tier 1 Table 3.5-7
  - Correct turbine island vent effluent radiation monitor tag from TDS-RY001 to TDS-RE001.

- Tier 1 Table 2.2.3-1
  - Correct entries for valves PXS-PL-V117A and PXS-PL-V117B in Control PMS/DAS from Yes/Yes to Yes/No.

- Tier 1 Table 3.5-1
  - Change entry for the Containment Atmosphere Radiation Monitor, PSS-RE027, from gaseous to particulate.

- Tier 1 Table 3.5-7
  - Change entry for the Containment Atmosphere Radiation Monitor, PSS-RE027, from gaseous to particulate.

- Tier 1 Table 3.3-6, ITAAC item 5.c
  - Revise PXS/Accumulator to PXS Valve/Accumulator in the acceptance criteria column.

- Tier 1 Table 2.7.1-4, ITAAC item 2.b
  - Change “components” to “piping” in the Inspections, Tests, and Analyses column.

- Tier 1 Table 3.3-6, ITAAC item 7.d, acceptance criteria ii.a, item 4
  - Change item 4 to add “open” before last “raceway” to read “For configurations that involve an enclosed raceway and an open raceway, the minimum vertical separation is 1 inch if the enclosed raceway is below the open raceway.”

- Tier 1 Table 3.3-6 ITAAC item 7.d, acceptance criteria ii.b, item 4
  - Change statement from: “For configurations that involve an enclosed raceway, the minmum vertical separation is 1 inch if the enclosed raceway is below the raceway.” to read: “For configurations that involve an enclosed raceway and an open raceway, the minimum vertical separation is 1 inch if the enclosed raceway is below the open raceway.”

- Tier 1 Table 3.3-6 ITAAC item 7.d, acceptance criteria ii.c, item 4
  - Change item 4 to add “open” before last “raceway” to read “For configurations that involve an enclosed raceway and an open raceway, the minimum vertical separation is 1 inch if the enclosed raceway is below the open raceway.”

- Tier 1 Table 2.6.6-1, Design Commitment 1, item (3) and acceptance criterion iv)
  - Change from lighting protection to lightning protection.

- Tier 1 Table 2.2.3-4, ITAAC 8.c
  - Change “PSX” to “PXS” in the Inspections, Tests, Analyses column for item xii.

- Tier 1 Table 2.3.10-2
  - Remove lines WLS-PL-L020, WSL-PL-L077 [sic], WLS-PL-L078 and WLS-PL-L079.

- Tier 1 Table 2.1.1-1, item 7.iv
  - Remove “new and” from the Inspections, Tests, Analyses and Acceptance Criteria columns item iv) description.

- Tier 1 Section 3.2, item 1.e)
  - Correct APP-OCS-GEH-520 document name to read “AP1000 Plant Startup Human Factors Engineering Design Verification Plan.”

This request will provide for the application of the requirements for granting exemptions from design certification information, as specified in 10 CFR Part 52, Appendix D, Section VIII.A.4, 10 CFR §§52.63, 52.7, and 50.12.

2.0 Background

SNC is the holder of Combined License Nos. NPF-91 and NPF-92, which authorizes construction and operation of two Westinghouse Electric Company AP1000 nuclear plants, named Vogtle Electric Generating Plant (VEGP) Units 3 and 4, respectively.

During the detailed design finalization of the systems, departures from the details identified in Tier 1 information were determined necessary to facilitate consistency with the actual design functions of the systems described in the plant-specific DCD Tier 2 information. This activity requests exemption from the generic DCD Tier 1 tables, which supports the associated COL Appendix C ITAAC.

An exemption from elements of the AP1000 certification (Tier 1) design information to allow a departure from the design description and ITAAC is requested.

3.0 Technical Justification of Acceptability

An exemption is requested to depart from AP1000 generic DCD Tier 1 material in regard to the AP1000 by correcting various editorial and consistency issues between Tier 1 and Tier 2 in Tier 1 tables and sections. The proposed exemption would allow a change to the plant-specific Tier 1 ITAAC information consistent with existing plant-specific DCD Tier 2 information.

The proposed changes to the description information presented in plant-specific Tier 1 are at a level of detail that is consistent with the information currently provided therein. The proposed changes neither adversely impact the ability to meet the design functions of the structures, systems, or components (SSCs) nor involve a significant decrease in the level of safety provided by the SSCs. Because the proposed editorial changes are consistent with plant-specific DCD Tier 2 information and the design, the changes do not affect a structure, system or component. The proposed changes to information in plant-specific DCD Tier 1 continue to provide the detail necessary to implement the corresponding ITAAC. Further, application of the current generic certified design information in Tier 1 as required by 10 CFR Part 52, Appendix D, Section III.B, in the particular circumstances discussed in this request would not serve the underlying purpose of the rule since it could be read to be inconsistent with the existing design information provided in Tier 2 of the plant-specific DCD.

4.0 Justification of Exemption

10 CFR 52, Appendix D, Section VIII.A.4 and 10 CFR 52.63(b)(1) govern the issuance of exemptions from elements of the certified design information for AP1000 nuclear power plants. Since SNC has identified changes to the Tier 1 information related to the structures as a result of further design review activities, an exemption to the certified design information in Tier 1 is needed.

10 CFR 52, Appendix D, and 10 CFR 50.12, §52.7, and §52.63 state that the NRC may grant exemptions from the requirements of the regulations provided six conditions are met: 1) the exemption is authorized by law [§50.12(a)(1)]; 2) the exemption will not present an undue risk to

the health and safety of the public [§50.12(a)(1)]; 3) the exemption is consistent with the common defense and security [§50.12(a)(1)]; 4) special circumstances are present [§50.12(a)(2)(ii)]; 5) the special circumstances outweigh any decrease in safety that may result from the reduction in standardization caused by the exemption [§52.63(b)(1)]; and 6) the design change will not result in a significant decrease in the level of safety [Part 52, App. D, VIII.A.4].

The requested exemption to allow changes to the description of the structures satisfies the criteria for granting specific exemptions, as described below.

1. **This exemption is authorized by law**

   The NRC has authority under 10 CFR 52.63, §52.7, and §50.12 to grant exemptions from the requirements of NRC regulations. Specifically, 10 CFR 50.12 and §52.7 state that the NRC may grant exemptions from the requirements of 10 CFR Part 52 upon a proper showing. No law exists that would preclude the changes covered by this exemption request. Additionally, granting of the proposed exemption does not result in a violation of the Atomic Energy Act of 1954, as amended, or the Commission's regulations.

   Accordingly, this requested exemption is "authorized by law," as required by 10 CFR 50.12(a)(1).

2. **This exemption will not present an undue risk to the health and safety of the public**

   The proposed exemption from the requirements of 10 CFR Part 52, Appendix D, Section III.B would allow changes to elements of the plant-specific DCD Tier 1 information, to depart from the AP1000 certified design information. The plant-specific DCD Tier 1 information will reflect the approved licensing basis for VEGP Units 3 and 4, and will maintain a consistent level of detail with that which is currently provided elsewhere in Tier 1 of the DCD. Therefore, the affected ITAAC in Tier 1 of the plant-specific DCD will serve its required purpose.

   These changes will not impact the ability of the structures to perform their design functions. Because the changes will not alter the operation of any plant equipment or systems, these changes do not present an undue risk from existing equipment or systems. These changes do not add any new equipment or system interfaces to the current plant design. The description changes do not introduce any new industrial, chemical, or radiological hazards that would represent a public health or safety risk, nor do they modify or remove any design or operational controls or safeguards that intended to mitigate any existing on-site hazards. Furthermore, the proposed changes would 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. Accordingly, these changes do not present an undue risk from any new equipment or systems.

   Therefore, the requested exemption from 10 CFR Part 52, Appendix D, Section III.B would not present an undue risk to the health and safety of the public.

3. The exemption is consistent with the common defense and security

The exemption from the requirements of 10 CFR Part 52, Appendix D, Section III.B would allow editorial and consistency changes to elements of the plant-specific Tier 1 DCD, thereby departing from the AP1000 certified design information. The proposed exemption will enable performance of the ITAAC associated with these changed elements, by reflecting consistent, clarified description information in the text, tables, and figures that are referenced in these ITAAC. The exemption does not alter or impede the design, function, or operation of any plant structures, systems, and components (SSCs) associated with the facility's physical or cyber security, and therefore does not affect any plant equipment that is necessary to maintain a safe and secure plant status. The proposed exemption has no impact on plant security or safeguards.

Therefore, the requested exemption is consistent with the common defense and security.

4. Special circumstances are present

10 CFR 50.12(a)(2) lists six "special circumstances" for which an exemption may be granted. Pursuant to the regulation, it is necessary for one of these special circumstances to be present in order for the NRC to consider granting an exemption request. The requested exemption meets the special circumstances of 10 CFR 50.12(a)(2)(ii). That subsection defines special circumstances as when "[a]pplication of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule."

The rule under consideration in this request for exemption is 10 CFR Part 52, Appendix D, Section III.B, which requires that a licensee referencing the AP1000 Design Certification Rule (10 CFR Part 52, Appendix D) shall incorporate by reference and comply with the requirements of Appendix D, including Tier 1 information. The VEGP Units 3 and 4 COLs reference the AP1000 Design Certification Rule and incorporate by reference the requirements of 10 CFR Part 52, Appendix D, including Tier 1 information. The underlying purpose of Appendix D, Section III.B is to describe and define the scope and contents of the AP1000 design certification, and to require compliance with the design certification information in Appendix D.

The proposed changes to correct editorial and consistency issues between Tier 1 and Tier 2 maintain the design functions of these systems. This change does not impact the ability of any SSCs to perform their functions or negatively impact safety. Accordingly, this exemption from the certification information will enable the licensee to safely construct and operate the AP1000 facility consistent with the design certified by the NRC in 10 CFR Part 52, Appendix D. Therefore, special circumstances are present, because application of the current generic certified design information in Tier 1 as required by 10 CFR Part 52, Appendix D, Section III.B, in the particular circumstances discussed in this request is not necessary to achieve the underlying purpose of the rule.

5. **The special circumstances outweigh any decrease in safety that may result from the reduction in standardization caused by the exemption**

   Based on the nature of the changes to the plant-specific Tier 1 information and the understanding that these changes support the actual system functions, it is likely that this exemption will be requested by other AP1000 licensees. However, if this is not the case, the special circumstances continue to outweigh any decrease in safety from the reduction in standardization because the design functions of the systems associated with this request will continue to be maintained. This exemption request and the associated marked-up tables and figure demonstrate that there is a minimal change from the generic AP1000 DCD, minimizing the reduction in standardization and consequently the safety impact from the reduction. Therefore, the special circumstances associated with the requested exemption outweigh any decrease in safety that may result from the reduction in standardization caused by the exemption.

6. **The design change will not result in a significant decrease in the level of safety.**

   The exemption revises the plant-specific DCD Tier 1 information by correcting editorial and consistency issues in various systems. The changes for consistency and clarity will not impact the functional capabilities of these components. Because the design changes associated with this exemption request will not modify the design or operation of any systems or equipment, there are no new failure modes introduced by these changes and the level of safety provided by the current SSCs will be unchanged.

   Because the proposed changes to the system and non-system based descriptions will not adversely affect the ability of the SSCs to perform their design functions and the level of safety provided by the SSCs is unchanged, it is concluded that the description changes associated with proposed exemption will not result in a significant decrease in the level of safety.

5.0 Risk Assessment

A risk assessment was not determined to be applicable to address the acceptability of this proposal.

6.0 Precedent Exemptions

None.

7.0 Environmental Consideration

A review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment and the associated exemption does not involve (i) a significant hazards consideration, (ii) a significant change in the types or a significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Specific justification is provided in Section 5 of the corresponding amendment request. Accordingly, the proposed exemption meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed exemption.

8.0 Conclusion

The proposed changes to Tier 1 are necessary to correct information in design descriptions in plant-specific DCD Tier 1. The exemption request meets the requirements of 10 CFR 52.63, 10 CFR 52.7, 10 CFR 50.12, 10 CFR 51.22, and 10 CFR Part 52 Appendix D. Specifically, the exemption request meets the criteria of 10 CFR 50.12(a)(1) in that the request is authorized by law, presents no undue risk to public health and safety, and is consistent with the common defense and security. Furthermore, approval of this request does not result in a significant decrease in the level of safety, presents special circumstances, does not present a significant decrease in safety as a result of a reduction in standardization, and meets the eligibility requirements for categorical exclusion.

9.0 References

None.

Southern Nuclear Operating Company

Vogtle Electric Generating Plant Units 3 and 4

NND-13-2178

Enclosure 3

Proposed Changes to Licensing Basis Documents

(LAR-13-017)

Insertions Denoted by Blue Underline and Deletions by Red Strikethrough

Figure Changes Contained to Red Bubbled Area

(Note that the sheet numbers and the total number of sheets for the marked-up tables provided in this enclosure may be changed by the incorporation of this and other departures. These changes are considered editorial and do not require evaluation in this submittal.)

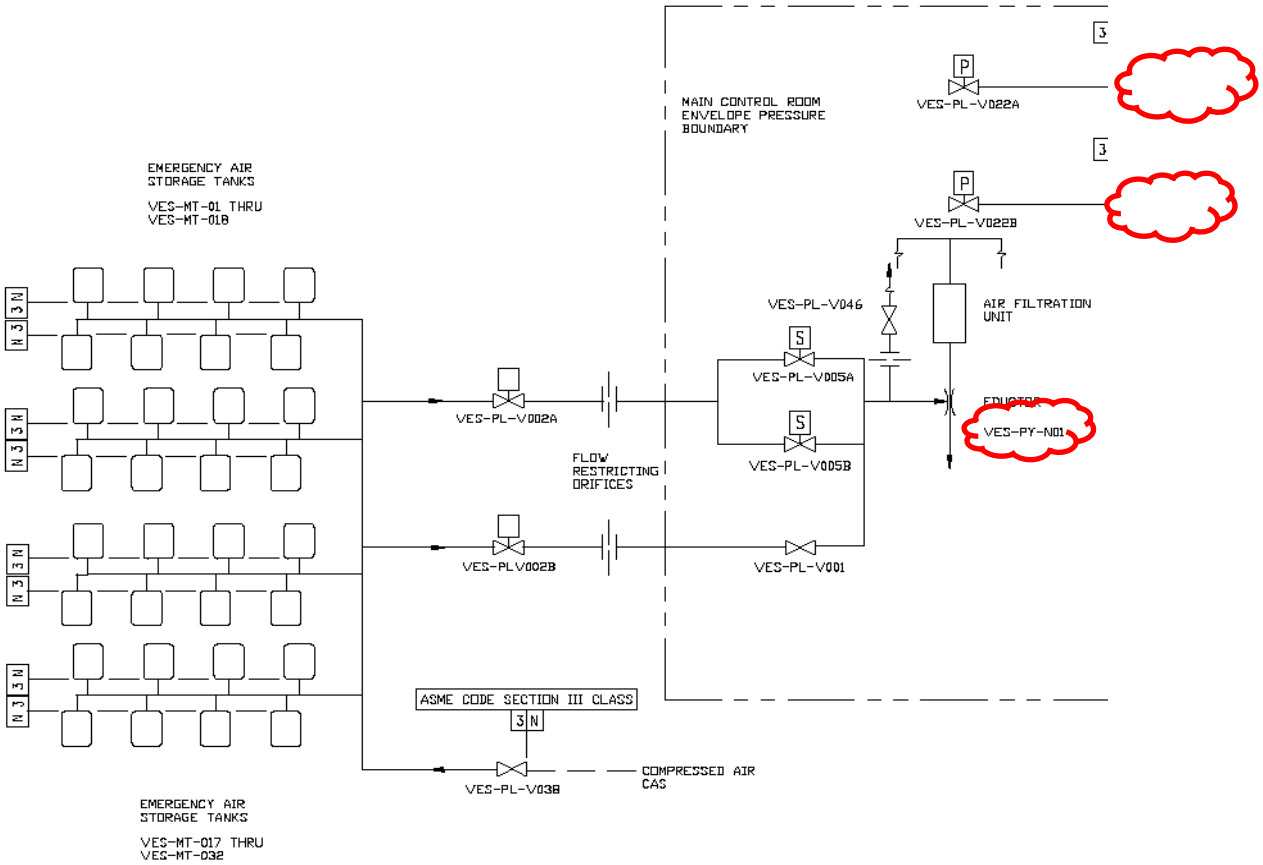
Change (a) - Tag Number Updates

Tier 1 Figure 2.2.5-1

[VEGP Tier 1, pg 2.2.5-16]

[VEGP Unit 3 COL, Appendix C, pg C-181]

[VEGP Unit 4 COL, Appendix C, pg C-181]



Change (a) - Tag Number Updates

Tier 1 Table 2.6.3-4

[VEGP Tier 1, pg 2.6.3-13]

[VEGP Unit 3 COL, Appendix C, pg C-346]

[VEGP Unit 4 COL, Appendix C, pg C-346]

Table 2.6.3-4

Component Name	Tag No.	Component Location
***	***	***
Division B 250 Vdc Distribution Panel	IDSB-DD-1	Auxiliary Building
Division C 250 Vdc Distribution Panel	IDSC-DD-1~~2~~	Auxiliary Building
Division D 250 Vdc Distribution Panel	IDSD-DD-1	Auxiliary Building
***	***	***

Change (a) - Tag Number Updates

Tier 1 Table 3.5-3

[VEGP Tier 1, pg 3.5-3]

[VEGP Unit 3 COL, Appendix C, pg C-444]

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

Table 3.5-3
Effluent Radiation Monitors

Equipment List	Equipment No.
***	***
Plant Vent (High Range Radiogas)	VFS-RE104B
Turbine Island Vent(1)	TDS-RE001 ~~TDS-RY001~~
Liquid Radwaste Discharge	WLS-RE229
***	***

Tier 1 Table 3.5-7

[VEGP Tier 1, pg 3.5-7]

[VEGP Unit 3 COL, Appendix C, pg C-448]

[VEGP Unit 4 COL, Appendix C, pg C-449]

Table 3.5-7

Component Name	Tag No.	Component Location
***	***	***
Turbine Island Vent Radiation Monitor	TDS-RE001 ~~TDS-RY001~~	Turbine Building
***	***	***

Change (b) - Diverse Actuation System Update

Tier 1 Table 2.2.3-1

[VEGP Tier 1, pg 2.2.3-7]

[VEGP Unit 2 COL, Appendix C, pg C-120]

[VEGP Unit 3 COL, Appendix C, pg C-120]

Table 2.2.3-1

Equipment Name	Tag No.	ASME Code Section III	Seismic Cat. I	Remotely Operated Valve	Class 1E/ Qual. Harsh Envir.	Safety-Related Display	Control PMS/ DAS	Active Function	Loss of Motive Power Position
***	***	***	***	***	***	***	***	***	***
Containment Recirculation A Isolation Motor-operated Valve	PXS-PL-V117A	Yes	Yes	Yes	Yes/Yes	Yes (position)	Yes/No ~~Yes/Yes~~	None	As Is
Containment Recirculation B Isolation Motor-operated Valve	PXS-PL-V117B	Yes	Yes	Yes	Yes/Yes	Yes (position)	Yes/No ~~Yes/Yes~~	None	As Is
***	***	***	***	***	***	***	***	***	***

Change (c) - Containment Atmosphere Radiation Monitor (PSS) Identified Function Update

Tier 1 Table 3.5-1

[VEGP Tier 1, pg 3.5-2]

[VEGP Unit 3 COL, Appendix C, pg C-443]

[VEGP Unit 4 COL, Appendix C, pg C-444]

Table 3.5-1

Equipment Name	Tag No.	Seismic Cat. I	Class 1E	Qual. for Harsh Envir.	Safety-Related Display
***	***	***	***	***	***
Containment Atmosphere Monitor (Gaseous)	PSS-RE026	Yes	No	No	No
Containment Atmosphere Monitor (particulate ~~gaseous~~, for RCS pressure boundary leakage detection)	PSS-RE027	Yes	No	No	No
***	***	***	***	***	***

Tier 1 Table 3.5-7

[VEGP Tier 1, pg 3.5-7]

[VEGP Unit 2 COL, Appendix C, pg C-447]

[VEGP Unit 3 COL, Appendix C, pg C-448]

Table 3.5-7

Component Name	Tag No.	Component Location
***	***	***
Containment Atmosphere Radiation Monitor (Gaseous)	PSS-RE026	Auxiliary Building
Containment Atmosphere Radiation Monitor (particulate ~~gaseous~~, for RCS pressure boundary leakage detection)	PSS-RE027	Auxiliary Building
***	***	***

Change (d) - Passive Core Cooling System Accumulator Name Update

Tier 1 Table 3.3-6

[VEGP Tier 1, pg 3.3-23]

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

[VEGP Unit 4 COL, Appendix C, pg C-430]

Table 3.3-6
Inspections, Tests, Analyses, and Acceptance Criteria

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
***	***	***
5.c) The boundaries between the following rooms, which contain safety-related equipment – PXS valve/accumulator room A (11205), PXS valve/accumulator room B (11207), and CVS room (11209) – are designed to prevent flooding between these rooms.	An inspection of the boundaries between the following rooms which contain safety-related equipment – PXS Valve/ Accumulator Room A (11205), PXS Valve/Accumulator Room B (11207), and CVS Room (11209) – will be performed.	A report exists that confirms that flooding of the PXS Valve/ Accumulator Room A (11205), and the PXS Valve/Accumulator Room B (11207) is prevented to a maximum flood level as follows: PXS A 110'-2", PXS B 110'-1"; and of the CVS room (11209) to a maximum flood level of 110'-0".
***	***	***

Change (e) – Inspections, Tests, Analyses Subject Clarification

Tier 1 Table 2.7.1-4

[VEGP Tier 1, pg 2.7.1-8]

[VEGP Unit 3 COL, Appendix C, pg C-372]

[VEGP Unit 4 COL, Appendix C, pg C-372]

Table 2.7.1-4
Inspections, Tests, Analyses, and Acceptance Criteria

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
***	***	***
2.b) The piping identified in Table 2.7.1-2 as ASME Code Section III is designed and constructed in accordance with ASME Code Section III requirements.	Inspection will be conducted of the as-built piping ~~components~~ as documented in the ASME design reports.	The ASME code Section III design reports exist for the as-built piping identified in Table 2.7.1-2 as ASME Code Section III.
***	***	***

Change (f) – Clarifications to Identify Open Raceways

Tier 1 Table 3.3-6

[VEGP Tier 1, pg 3.3-26 through 28]
[VEGP Unit 3 COL, Appendix C, pg C-432 through C-434]
[VEGP Unit 4 COL, Appendix C, pg C-433 through C-435]

Table 3.3-6
Inspections, Tests, Analyses, and Acceptance Criteria

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
***	***	***
7.d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.	Inspections of the as-built Class 1E raceways will be performed to confirm that the separation between Class 1E raceways of different divisions and between Class 1E raceways and non-Class 1E raceways is consistent with the following: ii) Within other plant areas (limited hazard areas), the minimum separation is defined by one of the following: *** 4) For configurations involving an enclosed raceway and an open raceway, the minimum vertical separation is 1 inch if the enclosed raceway is below the open raceway. ***	Results of the inspection will confirm that the separation between Class 1E raceways of different divisions and between Class 1E raceways and non-Class 1E raceways is consistent with the following: ii.a) Within other plant areas inside containment (limited hazard areas), the separation meets one of the following: *** 4) For configurations that involve an enclosed raceway and an open raceway, the minimum vertical separation is 1 inch if the enclosed raceway is below the open raceway. ***

Table 3.3-6
Inspections, Tests, Analyses, and Acceptance Criteria

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
7.d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.	Inspections of the as-built Class 1E raceways will be performed to confirm that the separation between Class 1E raceways of different divisions and between Class 1E raceways and non-Class 1E raceways is consistent with the following: ii) Within other plant areas (limited hazard areas), the minimum separation is defined by one of the following: *** 4) For configurations involving an enclosed raceway and an open raceway, the minimum vertical separation is 1 inch if the enclosed raceway is below the open raceway. ***	Results of the inspection will confirm that the separation between Class 1E raceways of different divisions and between Class 1E raceways and non-Class 1E raceways is consistent with the following: ii.b) Within other plant areas inside the non-radiologically controlled area of the auxiliary building (limited hazard areas), the separation meets one of the following: *** 4) For configurations that involve an enclosed raceway and an open raceway, the minimum vertical separation is 1 inch if the enclosed raceway is below the open raceway. ***
7.d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables. *** ***	Inspections of the as-built Class 1E raceways will be performed to confirm that the separation between Class 1E raceways of different divisions and between Class 1E raceways and non-Class 1E raceways is consistent with the following: ii) Within other plant areas (limited hazard areas), the minimum separation is defined by one of the following: *** 4) For configurations involving an enclosed raceway and an open raceway, the minimum vertical separation is 1 inch if the enclosed raceway is below the open raceway. ***	Results of the inspection will confirm that the separation between Class 1E raceways of different divisions and between Class 1E raceways and non-Class 1E raceways is consistent with the following: ii.c) Within other plant areas inside the radiologically controlled area of the auxiliary building (limited hazard areas), the separation meets one of the following: *** 4) For configurations that involve an enclosed raceway and an open raceway, the minimum vertical separation is 1 inch if the enclosed raceway is below the open raceway. ***

Change (g) – Grounding and Lightning Protection System ITAAC Table Spelling Errors

Tier 1 Table 2.6.6-1

[VEGP Tier 1, pg 2.6.6-2]

[VEGP Unit 2 COL, Appendix C, pg C-357 and C-358]

[VEGP Unit 3 COL, Appendix C, pg C-357 and C-358]

Table 2.6.6-1
Inspections, Tests, Analyses, and Acceptance Criteria

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
1. The EGS provides an electrical grounding system for: (1) instrument/computer grounding; (2) electrical system grounding of the neutral points of the main generator, main step-up transformers, auxiliary transformers, load center transformers, auxiliary and onsite standby diesel generators; and (3) equipment grounding of equipment enclosures, metal structures, metallic tanks, ground bus of switchgear assemblies, load centers, motor control centers, and control cabinets. Lightning protection is provided for exposed structures and buildings housing safety-related and fire protection equipment. Each grounding system and lightning ~~lighting~~ protection system is grounded to the station grounding grid.	i) An inspection for the instrument/computer grounding system connection to the station grounding grid will be performed. ii) An inspection for the electrical system grounding connection to the station grounding grid will be performed. iii) An inspection for the equipment grounding system connection to the station grounding grid will be performed. iv) An inspection for the lightning protection system connection to the station grounding grid will be performed.	i) A connection exists between the instrument/computer grounding system and the station grounding grid. ii) A connection exists between the electrical system grounding and the station grounding grid. iii) A connection exists between the equipment grounding system and the station grounding grid. iv) A connection exists between the lightning ~~lighting~~ protection system and the station grounding grid.

Change (h) – Passive Core Cooling System Table Typing Error

Tier 1 Table 2.2.3-4

[VEGP Tier 1, pg 2.2.3-24]

[VEGP Unit 3 COL, Appendix C, pg C-138]

[VEGP Unit 4 COL, Appendix C, pg C-138]

Table 2.2.3-4
Inspections, Tests, Analyses, and Acceptance Criteria

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
***	***	***
8.c) The PXS provides RCS makeup, boration, and safety injection during design basis events	***	***
	xii) Inspections will be conducted of the CMT level sensors (PXS~~PSX~~-11A/B/D/C, -12A/B/C/D, - 13A/B/C/D, -14A/B/C/D) upper level tap lines.	xii) Each upper level tap line has a downward slope of ≥ 2.4 degrees from the centerline of the connection to the CMT to the centerline of the connection to the standpipe.
***	***	***

Change (i) – Deleting Non-ASME Code Section III Lines from an ASME Code Section III Table

Tier 1 Table 2.3.10-2

[VEGP Tier 1, pg 2.3.10-4]

[VEGP Unit 3 COL, Appendix C, pg C-253]

[VEGP Unit 4 COL, Appendix C, pg C-253]

Table 2.3.10-2

Line Name	Line No.	ASME Section III	Functional Capability Required
WLS Drain from PXS Compartment A	WLS-PL-L062 ~~WLS-PL-L078~~	Yes	Yes
WLS Drain from PXS Compartment B	WLS-PL-L063 ~~WLS-PL-L079~~	Yes	Yes
WLS Drain from CVS Compartment	WLS-PL-L061 ~~WSL-PL-L077~~ ~~WLS-PL-L020~~	Yes	Yes

Change (j) – Clarifying the Scope of an ITAAC Line Item

Tier 1 Table 2.1.1-1

[VEGP Tier 1, pg 2.1.1-3]

[VEGP Unit 3 COL, Appendix C, pg C-47]

[VEGP Unit 4 COL, Appendix C, pg C-47]

Table 2.1.1-1 (cont.)
Inspections, Tests, Analyses, and Acceptance Criteria

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
***	***	***
7. The new and spent fuel storage racks maintain the effective neutron multiplication factor required by 10 CFR 50.68 limits during normal operation, design basis seismic events, and design basis dropped spent fuel assembly accidents over the spent fuel storage racks.	***	***
	iv) Analysis of the ~~new and~~ spent fuel storage racks under design basis dropped spent fuel assembly loads will be performed.	iv) A report exists and concludes that the ~~new and~~ spent fuel racks can withstand design basis dropped spent fuel assembly loads and maintain the calculated effective neutron multiplication factor required by 10 CFR 50.68(1) limits.
***		

Change (k) – Editorial change to correct the title of a document in a Design Description

Tier 1 Section 3.2, Item 1.e

[VEGP Tier 1, pg 3.2-2]

[VEGP Unit 2 COL, Appendix C, pg C-403]

[VEGP Unit 3 COL, Appendix C, pg C-403]

e) Plant HFE/HSI (as designed at the time of plant startup) verification - APP-OCS-GEH-520, “AP1000 Plant Startup Human Factors Engineering Design Verification Plan,” Westinghouse Electric Company LLC