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NOV 2 7 2013

Docket Nos.: 52-025

52-026

ND-13-2349 10 CFR 50.90

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

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4
Request for License Amendment:
Reclassification of Portions of Human Factors
Verification and Validation Planning Documents (LAR-13-034)

#### 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 License (COL) Numbers NPF-91 and NPF-92, for VEGP Units 3 and 4, respectively. The requested amendment reclassifies portions of the five Tier 2\* Human Factors (HF) Verification & Validation (V&V) planning documents listed in Updated Final Safety Analysis Report (UFSAR) Table 1.6-1 and Chapter 18, Subsection 18.11.2. These five documents outline the overall plan for HF V&V, including Human Factors Engineering (HFE) design verification, task support verification, integrated system validation, discrepancy resolution process, and verification at plant startup. The requested amendment identifies the portions of the five HF V&V planning documents that would more appropriately be classified as Tier 2, due to those portions having no impact on safety, and proposes the necessary departures to reclassify this information. This differentiation between Tier 2 and Tier 2\* information in the HF V&V planning documents will allow for revisions of these documents using the Tier 2 change process provided in 10 CFR 52 Appx, D § VIII.B.5.

The description, technical evaluation, regulatory evaluation (including the Significant Hazards Consideration determination), and environmental considerations for the proposed changes in the LAR are contained in Enclosure 1 to this letter. Enclosure 2 provides markups depicting the requested changes to the licensing basis documents (e.g., UFSAR).

The marked up licensing basis text in Enclosure 2 reflects changes to the five HF V&V planning documents, which are currently under NRC review as LAR-13-001, -010, -011, -012, and -013. However, the administrative activity to reclassify information currently identified as Tier 2\* material requested by this LAR-13-034 is unrelated to the technical request provided in the

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other five LARs associated with the HF V&V planning documents.

This letter contains no regulatory commitments.

SNC requests staff approval of this license amendment by March 21, 2014, to support development, review, and approval of the human factors (HF) verification and validation (V&V) implementation documents. Delayed approval of this license amendment could result in a unnecessary delay in the implementation of the HF V&V activities if any issues are identified during development of the implementation documents that requires a revision to any of the five HF V&V planning documents. SNC expects to implement the proposed amendment (through incorporation into the licensing basis documents; e.g. the UFSAR) within 30 days of the approval of the requested changes.

In accordance with 10 CFR 50.91, SNC is notifying the State of Georgia of this license amendment request 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.

(Affirmation and signature are provided on the following page)

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Mr. Brian H. Whitley 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

Brian H. Whitley

BiH. WK

BHW/NH/kms

Sworn to and subscribed before me this 27th day of November, 2013

Notary Public: Pristing Marie Seilvert

My commission expires: August 16,2016

Enclosures: 1) Request for License Amendment: Reclassification of Portions of Human Factors Verification and Validation Planning Documents (LAR-13-034)

2) Proposed Changes to the Licensing Basis Documents (LAR-13-034)

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# Southern Nuclear Operating Company Vogtle Electric Generating Plant Units 3 and 4

ND-13-2349

**Enclosure 1** 

### **Request for License Amendment:**

Reclassification of Portions of Human Factors Verification and Validation Planning Documents

(LAR-13-034)

(13 pages, including this cover page)

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  - 4.3. Significant Hazards Consideration Determination
  - 4.4. Conclusions
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- 6. References

ND-13-2349 Enclosure 1

Request for License Amendment: Reclassification of Portions of Human Factors Verification and Validation Planning Documents (LAR-13-034)

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

SNC requests staff approval of this license amendment by March 21, 2014, to support development, review, and approval of the human factors (HF) verification and validation (V&V) implementation documents. Delayed approval of this license amendment could result in a delay in the implementation of the HF V&V activities if any issues are identified during development of the implementation documents that requires a revision to any of the five HF V&V planning documents.

#### 1. Summary Description

The proposed changes reclassify portions of the five Tier 2\* Human Factors (HF) Verification & Validation (V&V) planning documents listed in Updated Final Safety Analysis Report (UFSAR) Table 1.6-1 and Chapter 18, Section 18.11.2. These documents outline the overall plan for HF V&V, including Human Factors Engineering (HFE) design verification, task support verification, integrated system validation, discrepancy resolution process, and verification at plant startup. The five HF V&V documents are currently classified as entirely Tier 2\*. However, there is content in each of the documents that can be classified as Tier 2. The content being designated as Tier 2 has no impact on safety, nor does it affect the merits of the HF V&V activities. For example the content that would be designated as Tier 2 would include the documents' tables of contents, bibliography, and list of references. To effect this change, the revision numbers for each HFE document will now be identified as Tier 2 information. This differentiation will allow for revisions of the HF V&V documents for Tier 2 changes (e.g., updating the revision number for a reference) using the process provided in 10 CFR 52 Appx, D § VIII.B.5. Updating revision numbers to the HFE documents arising from Tier 2\* changes would continue to require NRC permission.

The requested amendment requires a change to Tier 2\* information in the UFSAR. This enclosure requests approval of the license amendment necessary to implement these UFSAR changes.

#### 2. Detailed Description and Technical Evaluation

The five Tier 2\* Human Factors (HF) Verification & Validation (V&V) planning documents listed in UFSAR Table 1.6-1 and Chapter 18, Subsection 18.11.2, outline the overall plan for HF V&V. This includes the following topics:

- <u>HFE Design Verification</u> Verifies that the human system interface (HSI) design conforms to HFE principles, guidelines, and standards.
- <u>Task Support Verification</u> Verifies that the HSI design provides the necessary alarms, displays, and controls to support plant personnel tasks.
- <u>Integrated System Validation</u> Validates that the HSI design can be effectively operated by personnel within the performance requirements.

- <u>Discrepancy Resolution Process</u> Describes the process for prioritizing, recording, tracking and resolving all Human Engineering Discrepancies (HEDs) identified from the HFE verification and validation activities.
- <u>Final Plant Design Verification</u> Verifies that the plant HFE/HSI conforms to the verified and validated design that resulted from the HSI design process. Verifies that the HEDs have been resolved and the HFE adequacy of those items that could not be assessed until equipment is installed and/or testing is underway.

The five HF V&V documents listed in Table 1.6-1 and Chapter 18, Section 18.11.2 of the UFSAR are currently classified as Tier 2\*. However, there is content in each of the documents that would more appropriately be classified as Tier 2. The content being designated as Tier 2 has no impact on safety, nor does it affect the merits of the HF V&V activities. The proposed changes identify the portions of the five HF V&V documents that are Tier 2 and those that are Tier 2\*, including the revision numbers.

The proposed change adds clarifying notes to UFSAR Subsection 18.11.2 to identify the sections of the HF V&V planning documents that are Tier 2 and those that are Tier 2\*. Similarly, the proposed change annotates each of the five documents with a note to identify the Tier 2 and Tier 2\* sections. In addition, the proposed change reclassifies the revision number for each document as Tier 2 information by relocating the revision numbers outside of the bracketed portion of the document title in UFSAR Table 1.6-1 and Subsection 18.11.2, thereby allowing revisions to the Tier 2 information in these documents using the process provided in 10 CFR 52 Appx, D § VIII.B.5.

#### Licensing Basis Change Descriptions

The following changes to UFSAR Table 1.6-1 and Chapter 18, Subsection 18.11.2, are proposed to differentiate between the Tier 2 and Tier 2\* portions of the five HF V&V documents. Specifically, the proposed changes add a note to the following references to identify the Tier 2 and Tier 2\* section, and move the revision numbers outside the Tier 2\* brackets, as shown below (changes shown in blue underlined font).

 In UFSAR Table 1.6-1, Material Referenced, revise information in the Title column for APP-OCS-GEH-120, 220, 320, 420, and 520, as follows:

AP1000 Human Factors Engineering Design Verification Plan, \*\*Revision 1, Westinghouse Electric Company LLC.

AP1000 Human Factors Engineering Task Support Verification Plan, \*\*Revision 1, Westinghouse Electric Company LLC.

AP1000 Human Factors Engineering Integrated System Validation Plan, \*\*Revision 3, Westinghouse Electric Company LLC.

AP1000 Human Factors Engineering Discrepancy Resolution Process,]\* Revision 1, Westinghouse Electric Company LLC.

AP1000 Plant Startup Human Factors Engineering Design Verification Plan, \*\* Revision 2, Westinghouse Electric Company LLC.

- In UFSAR Chapter 18, Subsection 18.11.2, revise References 3, 4, 5, 6, and 7, as follows:
  - [3. APP-OCS-GEH-120, "AP1000 Human Factors Engineering Design Verification Plan," Revision 1, Westinghouse Electric Company LLC. (1)
  - [4. APP-OCS-GEH-220, "AP1000 Human Factors Engineering Task Support Verification Plan,"]\* Revision 1, Westinghouse Electric Company LLC. (2)
  - [5. APP-OCS-GEH-320, "AP1000 Human Factors Engineering Integrated System Validation Plan," Revision 3, Westinghouse Electric Company LLC. (3)
  - [6. APP-OCS-GEH-420, "AP1000 Human Factors Engineering Discrepancy Resolution Process," Revision 1, Westinghouse Electric Company LLC. (4)
  - [7. APP-OCS-GEH-520, "AP1000 Plant Startup Human Factors Engineering Design Verification Plan," \*\* Revision 2, Westinghouse Electric Company LLC. (5)

#### Notes:

- 1. Section 1, Section 2, and Section 3 of APP-OCS-GEH-120 are Tier 2\*. Changes to these portions of the document require prior NRC approval. The remainder of the document, including its revision number, is Tier 2.
- 2. Section 1, Section 2, Section 3, Section 4, and Section 5 of APP-OCS-GEH-220 are Tier 2\*. Changes to these portions of the document require prior NRC approval. The remainder of the document, including its revision number, is Tier 2.
- 3. Section 1, Section 2, Section 3, Section 4, Section 5, Section 6, and Section 7 of APP-OCS- GEH-320 are Tier 2\*. Changes to these portions of the document require prior NRC approval. The remainder of the document, including its revision number, is Tier 2.
- 4. Section 1 and Section 2 of APP-OCS-GEH-420 are Tier 2\*. Changes to these portions of the document require prior NRC approval. The remainder of the document, including its revision number, is Tier 2.
- 5. Section 1, Section 2, and Section 3 of APP-OCS-GEH-520 are Tier 2\*. Changes to these portions of the document require prior NRC approval. The remainder of the document, including its revision number, is Tier 2.

This activity does not permit Tier 2\* information to be changed without prior NRC approval, but instead differentiates between Tier 2\* information that needs prior NRC approval and Tier 2 information, which may be changed by the licensee in accordance with the 10 CFR 52, Appendix D, Section VIII.B.5. The added notes clearly identify which information within the Tier 2\* documents remains Tier 2\*. If Tier 2\* information is changed within one of these five documents, then prior NRC approval would be needed before updating the document's revision number.

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Request for License Amendment: Reclassification of Portions of Human Factors Verification and Validation Planning Documents (LAR-13-034)

For each of the five HF V&V documents, the following sections are proposed to be designated as Tier 2 information:

- List of Contributors
- Revision History
- Table of Contents
- List of Tables
- List of Figures
- Acronyms and Trademarks
- Glossary of Terms
- References
- Bibliography

These sections provide information about the development, organization, and presentation of information in the document itself, but do not contain technical content regarding the details of the HF V&V plans. These sections have no impact on safety.

For the same reasons, the following additional sections in each document are proposed to be designated as Tier 2 information:

 APP-OCS-GEH-120, "AP1000 Human Factors Engineering Design Verification Plan,"

#### Appendix A: HFE Design Verification Discrepancy Form

A Human Engineering Deficiencies (HED) form is entered in the HF Tracking System to document deviations of the Human System Interface (HSI) resources or Operation and Control Centers System (OCS) from the design guidelines. Appendix A provides an example screen shot of an HFE Design Verification Discrepancy tracking form.

This appendix is proposed to be reclassified as Tier 2, because it is a screen shot of an example form and contains no information related to the HFE design verification plan. The purpose of the form is to provide a guideline for tracking discrepancies.

#### Appendix B: Preliminary Allocation of HFE Design Guidelines to HSI Resources

Appendix B provides an initial basis to correlate the specific guidelines (mandatory and recommended) to the HSI resources, such as Wall Panel Information System (WPIS), Alarm Presentation System (APS), Computerized Procedure System (CPS), Primary Dedicated Safety Panel (PDSP), Secondary Dedicated Safety Panel (SDSP), Diverse Actuation System (DAS).

This appendix is proposed to be reclassified as Tier 2, because it is a tool used by Westinghouse to map requirements to HSI resources. This appendix includes preliminary information to provide guidance to the HF verifier and therefore may change.

## Appendix C: Preliminary Allocation of HFE Design Guidelines to Operation and Control Centers

Appendix C provides an initial basis to correlate the specific guidelines (mandatory and recommended) to the OCS, such as the Main Control Room (MCR), MCR consoles, Remote Shutdown Room, Communication Facilities, Local Ovation Workstations, and Local Control Stations.

This appendix is proposed to be reclassified as Tier 2, because it is a tool used by Westinghouse to map requirements to specific OCS subsystems. This appendix includes preliminary information to provide guidance to the HF verifier and therefore may change.

#### APP-OCS-GEH-220, "AP1000 Human Factors Engineering Task Support Verification Plan"

#### Appendix A: HF Task Support Verification Discrepancy Form

An HF Task Support Verification Discrepancy Form is used to document discrepancies identified during the task support verification process. Appendix A provides an example screen shot of an HF Task Support Verification Discrepancy Form to promote complete coverage and consistency in documentation.

This appendix is proposed to be reclassified as Tier 2, because it is a screen shot of an example form and contains no information related to the HFE design verification plan.

## • APP-OCS-GEH-320, "AP1000 Human Factors Engineering Integrated System Validation Plan"

Questionnaires are one of the methods used to collect ISV results data used as the basis for determining whether the goals and performance requirements associated with the tasks were achieved. These questionnaires are to be completed by the ISV subjects and observers to assess situational awareness, workload, anthropometric and physiological factors, team performance, goal achievement, and usability. There are four questionnaires in APP-OCS-GEH-320.

The following four appendices are proposed to be reclassified as Tier 2, because they are tools used by Westinghouse to quantify the effectiveness of the trials and the performance of the personnel involved. The details in the questionnaires may be refined during the preparations for ISV.

#### **Appendix A: Post-Trial Questionnaire for Subjects**

Includes assessments of situation awareness, workload, team performance, and goal achievement.

#### **Appendix B: Final Questionnaire for Subjects**

Includes assessments of anthropometric and physiological factors, and usability.

#### **Appendix C: Post-Trial Questionnaire for Observers**

Includes assessments of team performance and goal achievement.

#### **Appendix D: Final Questionnaire for Observers**

Include assessments of anthropometric and physiological factors, and usability.

Appendices E and F provide example forms to assist in running the ISV trials and debriefing once the trials are complete.

This appendix is proposed to be reclassified as Tier 2, because they are tools used by Westinghouse to conduct and review the ISV trials. The appendices contain no information related to the HFE ISV plan.

#### **Appendix E: Trial Protocol**

This appendix provides the protocol and general sequence of events for running the ISV trials.

#### **Appendix F: Debriefing Protocol**

An informal debriefing of the test participants will be performed after each separate trial run. A formal debriefing will be held after each major period (typically one week) of testing. This appendix provides guidance for the formal debriefing process.

 APP-OCS-GEH-420, "AP1000 Human Factors Engineering Discrepancy Resolution Process"

No additional sections are proposed for reclassification as Tier 2 information.

 APP-OCS-GEH-520, "AP1000 Plant Startup Human Factors Engineering Design Verification Plan"

No additional sections are proposed for reclassification as Tier 2 information.

The proposed changes to reclassify portions of the five HF V&V planning documents 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.

The proposed changes to reclassify portions of the five HF V&V planning documents do not affect any plant radiation zones (addressed in UFSAR Section 12.3), nor do they affect controls established under 10 CFR 20 to preclude a significant increase in occupational radiation exposure.

#### 3. Technical Evaluation (Incorporated into Section 2)

#### 4. Regulatory Evaluation

#### 4.1 Applicable Regulatory Requirements/Criteria

10 CFR 52, Appendix D, Section VIII.B, requires prior NRC approval for a departure from Tier 2\* information. The requested amendment involves updating Tier 2\* brackets and italicized text within the licensing basis, which constitutes departures from plant-specific Tier 2\* information. Therefore, a license amendment request is required.

#### 4.2 Precedent

No precedent is identified.

#### 4.3 Significant Hazards Consideration Determination

The requested amendment reclassifies portions of the five Tier 2\* Human Factors (HF) Verification & Validation (V&V) planning documents listed in Updated Final Safety Analysis Report (UFSAR) Table 1.6-1 and Chapter 18, Section 18.11.2. These five documents outline the overall plan for HF V&V, including Human Factors Engineering (HFE) design verification, task support verification, integrated system validation, discrepancy resolution process, and verification at plant startup. The requested amendment identifies the portions of the five HF V&V planning documents that would more appropriately be classified as Tier 2, including the document revision numbers, and proposes the necessary departures to reclassify this information. This differentiation between Tier 2 and Tier 2\* information in the HF V&V planning documents will allow for revisions of these documents for Tier 2 changes (e.g., updating the revision number for a reference) using the process provided in 10 CFR 52 Appx, D § VIII.B.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:

# 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 changes reclassify portions of the five Tier 2\* Human Factors (HF) Verification & Validation (V&V) planning documents listed in the Updated Final Safety Analysis Report (UFSAR). These changes do not modify the design, construction, or operation of any plant structures, systems, or components (SSC), nor do they change any procedures or method of control for any SSCs. Because the proposed changes do not change the

design, construction, or operation of any SSCs, they do not adversely affect any design function as described in the UFSAR. Therefore, the proposed amendment does not affect the probability of an accident previously evaluated. Similarly, because the proposed changes do not alter the design or operation of the nuclear plant or any plant SSCs, the proposed changes do not represent a change to the radiological effects of an accident, and therefore, they do not involve an increase in the consequences of an accident previously evaluated.

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 changes are not a modification, addition to, or removal of any plant SSCs. Furthermore, the proposed changes are not a change to procedures or method of control of the nuclear plant or any plant SSCs. The only impact of this activity is the reclassification of portions of the five HF V&V planning documents as Tier 2 information. Because the proposed amendment does not change the design, construction, or operation of the nuclear plant or any plant operations, it does not affect the possibility of an accident.

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 changes reclassify portions of the five Tier 2\* HF V&V planning documents listed in the UFSAR from Tier 2\* to Tier 2. The proposed amendment only affects the classification of planning documents and does not change the design, construction, or operation of the nuclear plant or any plant operations; therefore, the changes do not affect any margin of safety.

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 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 requested 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 requested change does not involve a Significant Hazards Consideration.

#### 5. Environmental Considerations

The requested amendment reclassifies portions of the five Tier 2\* Human Factors (HF) Verification & Validation (V&V) planning documents listed in Updated Final Safety Analysis Report (UFSAR) Table 1.6-1 and Chapter 18, Section 18.11.2. These five documents outline the overall plan for HF V&V, including Human Factors Engineering (HFE) design verification, task support verification, integrated system validation, discrepancy resolution process, and verification at plant startup. The requested amendment identifies the portions of the five HF V&V planning documents that would more appropriately be classified as Tier 2, including the document revision numbers, and proposes the necessary departures to reclassify this information. This differentiation between Tier 2 and Tier 2\* information in the HF V&V planning documents will allow for revisions of these documents for Tier 2 changes (e.g., updating the revision number for a reference) using the process provided in 10 CFR 52 Appx, D § VIII.B.5.

The details of the proposed changes are provided in Section 2 of this licensing amendment request.

This review has determined the proposed departure requires an amendment to the COL; however, a review of the anticipated construction and operational effects of the proposed amendment has determined 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 requested amendment reclassifies portions of the five Tier 2\* Human Factors (HF) Verification & Validation (V&V) planning documents listed in Updated Final Safety Analysis Report (UFSAR) Table 1.6-1 and Chapter 18, Section 18.11.2. The portions of the HF V&V planning documents that would more appropriately be classified as Tier 2, including the document revision numbers, are identified and changes are proposed to reclassify this information as Tier 2. This differentiation between Tier 2 and Tier 2\* information in the HF V&V planning documents will allow for revisions of the Tier 2 portions of these documents using the process provided in 10 CFR 52 Appx, D § VIII.B.5. 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 changes to add notes to the UFSAR and move document revision numbers to outside the Tier 2\* bracket do not affect how the plant is designed, constructed, or operated. Plant radiation zones (addressed in UFSAR Section 12.3) are not affected, and controls established under 10 CFR 20 to preclude a significant increase in occupational radiation exposure are not affected. 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 effects of the proposed amendment do 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.

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Request for License Amendment: Reclassification of Portions of Human Factors Verification and Validation Planning Documents (LAR-13-034)

#### 6. References

None.

# Southern Nuclear Operating Company Vogtle Electric Generating Plant Units 3 and 4

ND-13-2349

#### **Enclosure 2**

Proposed Changes to the Licensing Basis Documents (LAR-13-034)

(3 pages, including this cover page)

### **UFSAR Section 1.6, Table 1.6-1, Material Referenced:**

### Revise Tier 2\* information, as shown below:

DCD Section Number	Westinghouse Topical Report Number	Title
* * *		
18.11	[WCAP-15860	Programmatic Level Description of the AP1000 Human Factors Verification and Validation Plan, Revision 2, October 2003]*
	[APP-OCS-GEH-120	APP-OCS-GEH-120 AP1000 Human Factors Engineering Design Verification Plan,]* Revision 1, Westinghouse Electric Company LLC]  ✓
	[APP-OCS-GEH-220	APP-OCS-GEH-220 AP1000 Human Factors Engineering Task Support Verification Plan, Revision 1, Westinghouse Electric Company LLC
	[APP-OCS-GEH-320	AP1000 Human Factors Engineering Integrated System Validation Plan, ** Revision 3, Westinghouse Electric Company LLC**
	[APP-OCS-GEH-420	AP1000 Human Factors Engineering Discrepancy Resolution Process,]* Revision 1, Westinghouse Electric Company LLC]*
	[APP-OCS-GEH-520	AP1000 Plant Startup Human Factors Engineering Verification Plan,]* Revision 2, Westinghouse Electric Company LLC]*
* * *		

#### **UFSAR Section 18.11, Subsection 18.11.2, References:**

#### Revise Tier 2\* information, as shown below:

- [3. APP-OCS-GEH-120, "AP1000 Human Factors Engineering Design Verification Plan," Revision 1, Westinghouse Electric Company LLC. (1)
- [4. APP-OCS-GEH-220, "AP1000 Human Factors Engineering Task Support Verification Plan," Revision 1, Westinghouse Electric Company LLC.
- [5. APP-OCS-GEH-320, "AP1000 Human Factors Engineering Integrated System Validation Plan," Revision 3, Westinghouse Electric Company LLC.
- [6. APP-OCS-GEH-420, "AP1000 Human Factors Engineering Discrepancy Resolution Process," Revision 1, Westinghouse Electric Company LLC.
- [7. APP-OCS-GEH-520, "AP1000 Plant Startup Human Factors Engineering Verification Plan," Revision 2, Westinghouse Electric Company LLC.

#### Notes:

- Section 1, Section 2, and Section 3 of APP-OCS-GEH-120 are Tier 2\*. Changes to these
  portions of the document require prior NRC approval. The remainder of the document,
  including its revision number, is Tier 2.
- 2. Section 1, Section 2, Section 3, Section 4, and Section 5 of APP-OCS-GEH-220 are Tier 2\*. Changes to these portions of the document require prior NRC approval. The remainder of the document, including its revision number, is Tier 2.
- 3. Section 1, Section 2, Section 3, Section 4, Section 5, Section 6, and Section 7 of APP-OCS- GEH-320 are Tier 2\*. Changes to these portions of the document require prior NRC approval. The remainder of the document, including its revision number, is Tier 2.
- 4. Section 1 and Section 2 of APP-OCS-GEH-420 are Tier 2\*. Changes to these portions of the document require prior NRC approval. The remainder of the document, including its revision number, is Tier 2.
- Section 1, Section 2, and Section 3 of APP-OCS-GEH-520 are Tier 2\*. Changes to these
  portions of the document require prior NRC approval. The remainder of the document,
  including its revision number, is Tier 2.