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MAY 06 2014

Docket No.: 52-025  
52-026

ND-14-0690  
10 CFR 50.90

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

Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Units 3 and 4  
Preliminary Amendment Request (PAR):  
Annex Building Column Line Changes (PAR-13-019)

Ladies and Gentlemen:

The U.S. Nuclear Regulatory Commission (NRC) issued the Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 combined license (COL) (License Nos. NPF-91 and NPF-92) to Southern Nuclear Operating Company (SNC) on February 10, 2012. By letter dated April 18, 2014, SNC submitted a request for a license amendment (LAR-13-019, SNC correspondence ND-14-0562) to make changes to various plant-specific Tier 1 (and COL Appendix C) information and Tier 2 material contained within the Updated Final Safety Analysis Report (UFSAR) to modify the annex and radwaste buildings.

SNC is submitting a Preliminary Amendment Request, PAR-13-019, to avoid possible construction delays for the Units 3 and 4 annex buildings during the NRC's evaluation of the related license amendment request (LAR). The determination of whether the NRC has any objection to SNC proceeding with the proposed plant licensing basis changes related to the annex building identified in the LAR is requested prior to July 1, 2014. Delayed determination regarding this PAR could result in a delay in the construction of the VEGP Unit 3 and 4 annex building.

A description of the requested change and the reason for the change are contained in Enclosure 1 to this letter. This PAR has been developed in accordance with guidance provided in the most recent revision to the Interim Staff Guidance on Changes during Construction Under 10 CFR Part 52, COL-ISG-25 [ML13045A125], and corresponds accurately and technically with the above-mentioned LAR-13-019. The technical scope of this PAR is consistent with the technical scope of the submitted LAR for annex building changes as accepted by the NRC for technical review [ML14113A063]. Section 7 of Enclosure 1 identifies the scope of the "no objection" sought in this PAR.

This letter does not contain any NRC commitments.

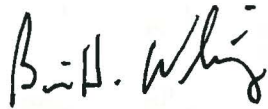
This letter revises the requested approval date for the license amendment indicated in SNC letter ND-14-0562 from July 1, 2014 to March 2, 2015. The expected implementation date of that proposed amendment would be revised from 15 days of approval of the requested changes to within 30 days of approval of the requested changes. Subsequent evaluations of scheduled construction activities revealed the planned annex building work for 2014 could be supported with a no objection finding.

Should you have any questions, please contact Mr. Jason Redd at (205) 992-6435.

Mr. Brian H. Whitley states that: he is the Regulatory Affairs Director of Southern Nuclear Operating Company; he 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



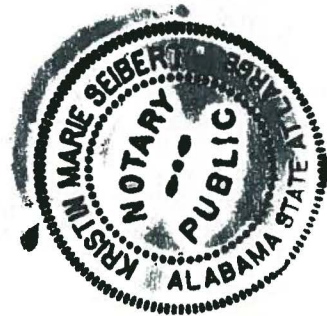
Brian H. Whitley

BHW/WES/kms

Sworn to and subscribed before me this 6<sup>th</sup> day of May 2014

Notary Public: Kristin Marie Seibert

My commission expires: August 16, 2016



Enclosure 1: Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Preliminary Amendment Request Regarding Annex Building Column Line Changes (PAR-13-019)

U.S. Nuclear Regulatory Commission

ND-14-0690

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**Southern Nuclear Operating Company**

**ND-14-0690**

**Enclosure 1**

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

**Preliminary Amendment Request  
Regarding  
Annex Building Column Line Changes  
(PAR-13-019)**

Pursuant to 10 CFR 50.90, Southern Nuclear Operating Company (SNC) submitted a license amendment request (LAR) to change the Vogtle Electric Generating Plant (VEGP), Units 3 and 4, licensing basis documents associated with Combined License Nos. NPF-91 and NPF-92, respectively. Accordingly, SNC requests the determination of whether the NRC has any objection to proceeding with construction of VEGP Units 3 and 4 Annex Building as identified in the Preliminary Amendment Request (PAR) below to be provided by the date shown below.

PAR Request Number: <b>SNC PAR-13-019</b>	Station Name: <b>VEGP</b>	Unit Number(s): <input checked="" type="checkbox"/> 3 <input checked="" type="checkbox"/> 4	PAR Request Date: <b>May 6, 2014</b>
<b>1. NRC PAR Notification Requested Date (see Block 7 for basis): July 1, 2014</b>			
<b>2. License Amendment Request References (as applicable):</b>			
<input checked="" type="checkbox"/> LAR submittal date and SNC Correspondence Number: April 18, 2014 / ND-14-0562			
<input type="checkbox"/> Expected LAR submittal date: _____			
<b>3. Brief Description of Proposed Change:</b>			
<p>This proposed change would revise the licensing basis, particularly the plant-specific Tier 1 (and COL Appendix C) figures and Updated Final Safety Analysis Report (UFSAR) figures related to the annex building column lines. The changes to column line designations in certain section views are editorial, conforming in nature and no physical changes are proposed.</p> <p>The annex building column lines on UFSAR Tier 2 Figure 3.7.2-19 (Sheets 2, 3, 5, 6, 7, and 8) sensitive unclassified non-safeguards information (SUNSI) are proposed to be changed from 10 to 10.05 to resolve inconsistencies in the column line designation between the annex building and the auxiliary building figures in the UFSAR. The column line 10 designation for the auxiliary building figures corresponds to North Coordinate 1089'-0" whereas the column line 10 designation for the annex building figures corresponds to North Coordinate 1092'-0". This update is proposed to align column line 10 between the annex and auxiliary buildings.</p> <p>The annex building column line on UFSAR Tier 2 Figure 3.7.2-19 (Sheet 8) (SUNSI) is proposed to be changed from 12 to 11.15 for consistency with the column line designations in Figure 3.7.2-19 Sheets 1, 2, 3, 5, 6, and 7 (SUNSI).</p> <p>Because the column line changes in Tier 2 are also included in Tier 1, plant-specific DCD Tier 1 (and COL Appendix C) Figures 3.3-11A (SUNSI), 3.3-12 (SUNSI) and 3.3-13 (SUNSI) are proposed to be changed to remove column line designations for columns 6, 8, 10, 11.15, 13.2, 13.3, 14.1, 15.1, 15.2, A, B, C and D. The changes to the Tier 1 Annex Building figures are being made because none of the column lines proposed to be removed are referred to in any Tier 1 tables or text.</p>			
<b>4. Reason for License Amendment Request:</b>			
<p>These proposed changes are for consistency between the annex building and auxiliary building figures in the UFSAR and modifies the description of the facility/design in the plant-specific DCD Tier 1. Plant-specific DCD Tier 1 Section 1.1 identifies that the design function of a column line is to provide a designation on the plant reference grid which is used to define the location of building walls and columns. The lines are used for clarifying the location of specific walls or sections. These proposed changes are being made to the annex building figures identified in item 3 to be consistent with the auxiliary building figures.</p>			

<p><b>5. Is Exemption Request Required?</b>    <input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p> <p><b>If Yes, Briefly Describe the Reason for the Exemption.</b></p> <p>An exemption is requested because LAR-13-019 requests a departure from plant-specific DCD Tier 1 information, as provided in 10 CFR Part 52, Appendix D, Design Certification Rule for the AP1000 Design. Specifically, a plant-specific departure from the DCD Tier 1 Figures would change the column line designations currently shown on the figures.</p>
<p><b>6. Identify Applicable Precedents:</b> No precedents identified.</p>
<p><b>7. Impact of Change on Installation and Testing Schedules:</b></p> <p>SNC's requested date for approval of this preliminary amendment request is July 1, 2014. This date will allow Units 3 and 4 annex building construction to proceed using updated figures. As such, this PAR requests a "no objections" finding related to license amendment (LAR-13-019).</p> <p>SNC requests to proceed with Units 3 and 4 annex building construction using the updated figure information defined in the proposed changes to the licensing basis as described below. Figures that contain SUNSI, also known as Security-Related Information (SRI), are identified as such and requested to be withheld under 10 CFR 2.390(d).</p> <ul style="list-style-type: none"><li>• UFSAR Figure 3.7.2-19 (Sheets 2, 3, 5, 6, 7, and 8) (SUNSI) – Column Line 10 designation is changed to 10.05.</li><li>• UFSAR Figure 3.7.2-19 (Sheet 8) (SUNSI) – Column Line 12 designation is changed to 11.15.</li><li>• Plant-specific DCD Figures 3.3-11A (SUNSI), 3.3-12 (SUNSI), and 3.3-13 (SUNSI) – Column Line designations for Column Lines 6, 8, 10, 11.15, 13.2, 13.3, 14.1, 15.1, 15.2, A, B, C and D are deleted. There are also corresponding changes to COL Appendix C Figures 3.3-11A (SUNSI), 3.3-12 (SUNSI), and 3.3-13 (SUNSI).</li></ul> <p>The changes to column line designations in certain section views are editorial, conforming in nature and no physical changes are proposed.</p>
<p><b>8. Impact of Change on ITAAC:</b></p> <p>Tier 1 and COL Appendix C, Section 3.3 provides the physical arrangement of the annex building as shown on Figures 3.3-1 through 3.3-14. The proposed activity would change the annex building column line designations as shown in Figures 3.3-11A, 3.3-12, and 3.3-13. This PAR should be considered for any inspections related to ITAAC 3.3.00.01 (Item Nos.759) of VEGP Units 3 and 4 COL Appendix C Table 3.3-6. The final approval of LAR-13-019 will allow closure of this ITAAC. A "no objections" finding is requested for this PAR to allow construction to proceed pursuant to the process outlined in COL Condition 2.D. (1), Changes during Construction.</p>
<p><b>9. Additional Information:</b> None</p>