



April R. Rice  
Manager, Nuclear Licensing  
New Nuclear Deployment

June 3, 2014  
NND-14-0306  
10 CFR 50.90

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

Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3  
Combined License Nos. NPF-93 and NPF-94  
Docket Nos. 52-027 & 52-028

Subject: LAR 13-42S1 Request for License Amendment and Exemption: Tier 1  
Editorial and Consistency Changes

Reference: 1. Letter from Ronald A. Jones (SCE&G) to Document Control Desk  
(NRC), *LAR 13-42 Request for License Amendment and Exemption: Tier 1  
Editorial and Consistency Changes*, dated May 20, 2014. [ML14140A637]

On May 20, 2014 and in accordance with the provisions of 10 CFR 50.90, South Carolina Electric & Gas Company (SCE&G) requested an amendment to the Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 combined licenses (COLs) (License Nos. NPF-93 and NPF-94, respectively). The proposed amendment would allow various changes to correct editorial errors in COL Appendix C and promote consistency with the Updated Final Safety Analysis Report (Tier 2 information). Because the proposed changes impact Tier 1 of the Plant-Specific DCD and Appendix C of the COL, this activity has been determined to require prior NRC approval. Also, because the change requires a departure from Tier 1 information, an exemption is requested from the requirements of the Generic DCD Tier 1 pursuant to the provisions of 10 CFR 52.63(b) and 10 CFR 52.7.

This supplement intends to clarify that the License Amendment Request is proposing to depart from COL Appendix C information. As such, a replacement for Enclosure 1, entitled Enclosure 1S, is being provided. Further justification for the associated exemption request is provided in Enclosure 2 to Reference 1. The proposed markups depicting the requested changes to Tier 1 and COL Appendix C are contained in Enclosure 3 to Reference 1.

In order to support the VCSNS Units 2 and 3 construction schedule, SCE&G requests NRC staff review and approval of the license amendment by August 4, 2015. This license amendment will be implemented by SCE&G within 30 days of approval.

In accordance with 10 CFR 50.91, SCE&G is notifying the State of South Carolina of this supplement by transmitting a copy of this letter and enclosures to the designated State Official.

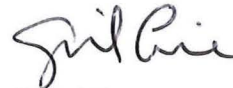
This letter contains no regulatory commitments.

Should you have any questions, please contact Mr. Justin Bouknight by telephone at (803) 941-9828, or by email at [justin.bouknight@scana.com](mailto:justin.bouknight@scana.com).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 3<sup>rd</sup> day of June, 2014.

Sincerely,



April R. Rice  
Manager, Nuclear Licensing  
New Nuclear Deployment

JGE/ARR/je

Enclosure 1S: Virgil C. Summer Nuclear Station Units 2 and 3 – Request for License Amendment: Tier 1 Editorial and Consistency Changes (LAR 13-42S1)

c: Denise McGovern  
Ravindra Joshi  
David Jaffe  
Rahsean Jackson  
Victor McCree  
Jim Reece  
Stephen A. Byrne  
Jeffrey B. Archie  
Ronald A. Jones  
April Rice  
Justin Bouknight  
Alvis J. Bynum  
Kathryn M. Sutton  
Julie Ezell  
Dean Kersey  
Margaret Felkel  
Cynthia Lanier  
Amy Aughtman  
Neil Haggerty  
Christopher Levesque  
Dan Churchman  
Joel Hjelseth  
Brian McIntyre  
Zach Harper  
William E. Hutchins  
Curt Castell  
Ken Hollenbach  
Susan E. Jenkins  
William M. Cherry  
Rhonda O'Banion  
VCSummer2&3ProjectMail@cbi.com  
vcsummer2&3project@westinghouse.com  
DCRM-EDMS@SCANA.COM

**South Carolina Electric & Gas Company**

**NND-14-0306**

**Enclosure 1S**

**Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3**

**Request for License Amendment Regarding  
Tier 1 Editorial and Consistency Changes  
(LAR 13-42S1)**

**Table of Contents**

1. Summary Description
2. Detailed Description and Technical Evaluation
3. Technical Evaluation (included in Section 2)
4. Regulatory Evaluation
  - 4.1 Applicable Regulatory Requirements/Criteria
  - 4.2 Precedent
  - 4.3 Significant Hazards Consideration
  - 4.4 Conclusions
5. Environmental Considerations
6. References

Pursuant to 10 CFR 50.90, South Carolina Electric & Gas (SCE&G) hereby requests an amendment to Combined License (COL) Numbers NPF-93 and NPF-94 for the Virgil C. Summer Nuclear Station (VCSNS), Units 2 and 3, respectively.

## 1. Summary Description

The proposed changes would revise the Combined Licenses (COLs) by making various nontechnical changes to COL Appendix C and corresponding plant-specific Tier 1 information. The proposed changes would correct editorial errors (e.g., typing, clerical, spelling, data entry, format, tag number changes) and/or consistency errors (e.g., inconsistencies between Updated Final Safety Analysis Report (UFSAR) (Tier 2) and COL Appendix C/Tier 1 information, and inconsistencies between information from different locations within COL Appendix C/Tier 1). No structure, system, or component (SSC), design function or analysis as described in the UFSAR would be affected.

For each of the COL Appendix C changes proposed below, the exemption necessary to implement the corresponding change to plant-specific Tier 1 is also requested in Enclosure 2. There is no UFSAR (Tier 2) change associated with the proposed COL Appendix C changes. This enclosure requests approval of the license amendment necessary to implement the changes described below.

## 2. Detailed Description and Technical Evaluation

UFSAR (Tier 2) design descriptions are derived from plant design documents. 10 CFR Part 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, and therefore COL Appendix C 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 COL Appendix C corrections are proposed to promote consistency. In addition, a number of editorial errors in COL Appendix C need to be corrected. None of the changes result in physical changes to the plant or changes to the original design function of the plant.

### Proposed COL Appendix C Changes

- a) Table 2.2.2-3 – Plant-specific Design Control Document (DCD) Tier 1, Section 1.4, COL Appendix C, Section 1.4, UFSAR (Tier 2) Table 6.2.2-1, note 4, and Subsection 9.1.3.4.3 define the acronym PCCAWST for the passive containment cooling ancillary water storage tank. COL Appendix C and Tier 1 Section 2.2.2 and Table 2.2.2-3, Item 8 also refer to the passive containment cooling ancillary water storage tank (PCCAWST). However, the Table 2.2.2-3 Item 8.b) acceptance criterion refers to the “PCCASWST” rather than the “PCCAWST,” thus “PCCASWST” is proposed to be changed to “PCCAWST” in the Table 2.2.2-3 Item 8.b) acceptance criterion. It should be noted that the acronym “PCCASWST” is not defined in the UFSAR, COL Appendix C or plant-specific Tier 1 information, nor is the acronym used in any other location within the UFSAR, COL Appendix C, or plant-specific Tier 1.
- b) Table 2.2.3-4 – Plant-specific Tier 1, Section 1.4, COL Appendix C, Section 1.4, and UFSAR (Tier 2) Table 1.7-2 define the Passive Core Cooling System acronym as “PXS.” COL Appendix C and plant-specific Tier 1 Section 2.2.3 provides Inspections, Tests, Analyses and Acceptance Criteria (ITAAC) for the Passive Core Cooling System (PXS). However, the Item 6 acceptance criterion in Table 2.2.3-4 has a typing

error. The Item 6 Design Commitment addresses the as-built PXS piping lines in Table 2.2.3-2, while, the Item 6 acceptance criterion incorrectly refers to “RCS” piping rather than “PXS” piping. Therefore, “RCS” is proposed to be changed to “PXS” in the Table 2.2.3-4 Item 6 acceptance criterion.

- c) Table 2.2.3-6 – COL Appendix C and plant-specific Tier 1 Table 2.2.3-6 list RCS Wide Range Pressure Sensors tag numbers as RCS-191A, B, C, D. However, UFSAR (Tier 2) Table 3.11-1, UFSAR (Tier 2) Table 3I.6-2, COL Appendix C Table 2.1.2-1, and Tier 1 Table 2.1.2-1 all correctly list the RCS Wide Range Pressure Sensors as RCS-140A, B, C, D. Tier 1, Table 2.1.2-1, COL Appendix C Table 2.1.2-1, COL Appendix C Table 3.7-1, and Tier 1 Table 3.7-1 identify RCS-191A, B, C and D as Pressurizer Pressure Sensors. Therefore, “RCS-191A, B, C, D” is proposed to be changed to “RCS-140A, B, C, D” in COL Appendix C Table 2.2.3-6, to be consistent with the plant design as described in UFSAR Tier 2 Tables 3.11-1 and 3I.6-2 as well as COL Appendix C and Tier 1, Table 2.1.2-1 and 3.7-1.
- d) Table 2.2.4-1 -- UFSAR (Tier 2) Table 3.9-16 and design documentation specify that the safety-related steam generator (SG) blowdown isolation valves (SGS-PL-V075A and SGS-PL-V075B) and safety-related steam line condensate drain control valves (SGS-PL-V086A and SGS-PL-V086B) are to have safety-related remote indication for valve position. However, COL Appendix C and Tier 1 Table 2.2.4-1 shows those valves as not having safety-related displays. Therefore, in COL Appendix C, Table 2.2.4-1, the SGS-PL-V075A, SGS-PL-V075B, SGS-PL-V086A and SGS-PL-V086B “Safety-Related Display” indication is proposed to be changed from “No” to “Yes (Valve Position),” to be consistent with the plant design as described in UFSAR (Tier 2) Table 3.9-16.
- e) Table 2.2.4-4 – Plant-specific Tier 1, Section 1.4, COL Appendix C Section 1.4, and UFSAR (Tier 2) Table 1.7-2 define the Steam Generator System acronym as “SGS.” COL Appendix C Section 2.2.4 provides ITAAC for the Steam Generator System (SGS). However, the Item 6 acceptance criterion in Table 2.2.4-4 has an editorial error. The Item 6 Design Commitment addresses the as-built SGS piping lines in Table 2.2.4-2. However, the Item 6 acceptance criterion incorrectly refers to “RCS” piping rather than “SGS” piping, thus “RCS” is proposed to be changed to “SGS” in the COL Appendix C Table 2.2.4-4 Item 6 acceptance criterion to be consistent with the Design Commitment.
- f) Figure 2.2.4-1 – COL Appendix C and plant-specific Tier 1, Section 1.4 and UFSAR (Tier 2) Table 1.7-2 define the Main Turbine System acronym as “MTS.” COL Appendix C Figure 2.2.4-1 (Sh 3) has the MTS turbine control valves (MTS-PL-V002A/B and V004A/B) and MTS turbine stop valves (MTS-PL-V001A/B and V003A/B) mislabeled as “MSS” valves, and incorrectly shows them to have pneumatic-hydraulic actuators. As shown in Tier 2 (UFSAR) Table 3.9-16 and described in Tier 2 (UFSAR) Section 10.2, these valves have electro-hydraulic actuators. Additionally, valves MSS-PL-V001 through MSS-PL-005 are already shown on Figure 2.2.4-1. To be consistent with the plant design in UFSAR (Tier 2) Table 3.9-16 and Section 10.2, the COL Appendix C Figure 2.2.4-1 (Sh 3) identifications for the turbine control valves (MTS-PL-V002A/B and V004A/B) and the turbine stop valves (MTS-PL-V001A/B and V003A/B) are proposed to be changed from “MSS” to “MTS”, and their actuator

identifications changed from “P/H” (pneumatic-hydraulic) to “E/H” (electro-hydraulic). There is no stop or control valve function or design change associated with these proposed COL Appendix C changes.

- g) Table 2.2.5-5 – Plant-specific Tier 1 Section 1.4 and COL Appendix C Section 1.4 define the Main Control Room acronym as “MCR.” Throughout the UFSAR (Tier 2), COL Appendix C, and Tier 1 “MCR” is used as the acronym for the Main Control Room. However, COL Appendix C Table 2.2.5-5, Item 12, Inspections, Tests, Analyses column has the Main Control Room acronym spelled “MRC.” Therefore, “MRC” is proposed to be changed to “MCR” in the Table 2.2.5-5, Item 12, Inspections, Tests, Analyses column. Note that the acronym “MRC” is not defined in the plant-specific Tier 1, COL Appendix C, or UFSAR information nor is the acronym used in any other location within Tier 1, COL Appendix C, or the UFSAR.
- h) Table 2.3.2-2 – COL Appendix C Table 2.3.2-2 provides the CVS line names and lists the specific line numbers associated with each line named. Currently, the table incorrectly has line number “L073” in Line Name “CVS Return Line from Regenerative Heat Exchanger” row. Consistent with the design as licensed, Line number “L073” is one of the “CVS Lines from RC Filters to Regenerative Heat Exchanger” lines, thus line number “L073” and its associated “No” in the ASME Code Section III column is proposed to be moved to the “CVS Lines from RC Filters to Regenerative Heat Exchanger” row. The design of L073 is not affected.
- i) Table 2.3.6-1 -- Valve RNS-PL-V061 performs a containment isolation function, is located inside containment, and as noted in UFSAR Table 3.11-1 and design documentation, is to be qualified for harsh environment. However, COL Appendix C Table 2.3.6-1 indicates that RNS-PL-V061 is not qualified for harsh environment. Therefore, in COL Appendix C Table 2.3.6-1 the RNS-PL-V061 “Qual. for Harsh Envir.” indication is proposed to be changed from “No” to “Yes.”
- j) Table 2.3.6-4 -- Plant-specific Tier 1 Section 1.4, COL Appendix C Section 1.4, and UFSAR (Tier 2) Table 1.7-2 define the Normal Residual Heat Removal System acronym as “RNS.” COL Appendix C Section 2.3.6 provides ITAAC for the Normal Residual Heat Removal System (RNS). However, the Item 6 acceptance criterion in Table 2.3.6-4 has a typing error. The Item 6 Design Commitment addresses the as-built RNS piping lines in Table 2.3.6-2. However, the Item 6 acceptance criterion incorrectly refers to “RCS” piping rather than “RNS” piping, thus “RCS” is proposed to be changed to “RNS” in the Table 2.3.6-4 Item 6 acceptance criterion to be consistent with its associated Design Commitment.
- k) Tables 2.3.10-1 and 2.3.10-4 – COL Appendix C Table 2.3.10-1 identifies (including tag numbers) various Liquid Radwaste System (WLS) components, and Appendix C Table 2.3.10-4 provides the ITAAC for the WLS. In accordance with the plant-specific Tier 1 Section 1.1 definition for Tag Number, Tier 1, and therefore COL Appendix C typically shows simplified tag number formats. For example, level sensor tag numbers within Tier 1 and COL Appendix C have a two field XXX-### format. However, COL Appendix C Tables 2.3.10-1 and 2.3.10-4 show the WLS containment sump level sensor tag numbers as having a XXX-XX-### format, i.e., WLS-LT-034, -035 and -036. Therefore for consistency, in Table 2.3.10-1 and three locations within Item 7.a) in



Table 2.3.10-4, those tag numbers are proposed to be replaced with "WLS-034," "WLS-035" and "WLS-036," respectively.

- l) Table 2.3.14-2 – COL Appendix C Table 2.3.14-2 Item 3 Design Commitment states that the condensate storage tank (CST) supplies water to the Feedwater System (FWS) startup feedwater "tanks." However, consistent with the actual plant design, UFSAR (Tier 2) subsection 9.2.4.1.2, COL Appendix C and Tier 1 Table 2.4.1-2 Item 2 Design Commitment and COL Appendix C and Tier 1 Table 2.3.14-2 Item 3 Acceptance Criteria correctly state that the CST supplies water to the startup feedwater "pumps." Therefore, in the COL Appendix C Table 2.3.14-2 Item 3 Design Commitment, "tanks" is proposed to be changed to "pumps."
- m) Table 2.3.14-2 -- There is a typing error in the Inspections, Tests, Analyses column of COL Appendix C Table 2.3.14-2, Item 4, which currently reads "Inspection will be performed for retrievability or parameters in the MCR". The applicable displays are to show retrieved parameters, thus that statement needs to be edited for clarity. The correct wording should be "Inspection will be performed for retrievability of parameters in the MCR." Therefore for both clarity and readability, "or" is proposed to be changed to "of" in COL Appendix C Table 2.3.14-2, Item 4.
- n) Table 2.6.3-3, item 4.i) and Section 2.6.3, item 4.i) – COL Appendix C Table 2.6.3-3 ITAAC Design Commitment Item 4.i) confirms that the IDS supplies adequate operating voltages to Class 1E motor operated valves (MOVs) listed within various Tier 1 and Appendix C subsections, as applicable. However, this Design Commitment is missing an applicable Tier 1 location. Tier 1 Table 2.7.1-1 also includes Class 1E MOVs, but subsection 2.7.1 is not listed in Item 4.i). Therefore, to ensure the completeness of COL Appendix C Table 2.6.3-3 ITAAC Item 4.i), subsection "2.7.1" is proposed to be added to the Item 4.i) Design Commitment. Additionally, in the corresponding Design Description in Section 2.6.3, the same change is proposed for item 4.i). There is no design change associated with this change.
- o) Table 2.6.3-4 – COL Appendix C Table 2.6.3-4 describes the 1E Spare Battery Bank, IDSS-DB-1 as a "Spare 125 Vdc Battery Bank". However, consistent with the plant design, Tier 1 Table 2.6.3-1 (correctly) identifies IDSS-DB-1 as a "Spare 250 Vdc Battery Bank". Tier 1 Table 2.6.3-1 is consistent with UFSAR (Tier 2) Subsection 8.3.2.1.1.1, Class 1E DC Distribution, which describes the battery banks as 250 Vdc Battery Banks. Therefore, "125" Vdc is proposed to be changed to "250" Vdc in COL Appendix C Table 2.6.3-4.
- p) Section 3.3 – COL Appendix C Section 3.3, Design Description, 4<sup>th</sup> paragraph, 3<sup>rd</sup> sentence reads "The turbine building structure is adjacent to the nuclear island structures consisting of the auxiliary building to the south and the annex building to the south and east." However, as shown in UFSAR (Tier 2) Figures 1.2-4 through 1.2-16, UFSAR (Tier 2) Figure 3.7.2-12, and Tier 1 Figures 3.3-1 through 3.3-10 and Tier 1 Figure 3.3-14, the nuclear island structures do not include the annex building. Additionally, UFSAR Section 1.2.1.6.1 states: "The nuclear island consists of a free-standing steel containment building, a concrete shield building, and an auxiliary building." Therefore, the sentence is proposed to be clarified to be consistent with the

aforementioned Figures and Section to read “The turbine building structure is adjacent to the auxiliary building to the south and the annex building to the south and east.”

- q) Table 3.3-1 – COL Appendix C Table 3.3-1 labels the Annex Building Column line F wall, from 4.1 North, and from El. 100'-0" to 117'-6" as a shield wall. This is inconsistent with the design, as shown in UFSAR (Tier 2) Figures 1.2-201, 3.7.2-19 (Sh. 1 and 2), 9A-201, 12.3-201, 12.3-202, and 12.3-203. Each of those figures either does not show the subject wall (e.g., structural Figures 3.7.2-19, Sh. 1 and 2) or just shows the wall as a thin (non-concrete) wall to partition one office from another. The UFSAR (Tier 2) 12.3-# series figures do not indicate the wall is a shield wall. In addition, the UFSAR (Tier 2) 12.3-# series figures show the wall and its associated offices to be in the same radiation zone, thus the wall does not provide shielding between the offices, and should not be included as a shield wall in Table 3.3-1. Additionally, this wall is not shown on Figure 3.7.2-19 (Sh. 1 and 2) which show the key structural dimensions for the Annex Building. Therefore, the COL Appendix C Table 3.3-1 for Annex Building “N-S Shield Wall on Column line F,” from 4.1 North, and from El. 100'-0" to 117'-6" line item is to be deleted from the table.
- r) Section 3.3, Item 5.c) and Table 3.3-6, Item 5.c) -- UFSAR (Tier 2) Figure 1.2-6 correctly shows Nuclear Island Rm 11206 as PXS valve/accumulator Room A, and Nuclear Island Rm 11205 as Reactor Vessel (RV) Nozzle Area. Additionally, consistent with the above referenced Figure, Tier 1 and COL Appendix C Table 2.3.9-3, Item 3. iii), Tier 1 and COL Appendix C Table 2.3.10-1, Tier 2 Subsection 3.4.1.2.2.1, Tier 2 Table 3.6.-2, Tier 2 Subsection 9A.3.1.1.3 and Tier 2 Table 9A-3 all correctly refer to PXS valve/accumulator Room A as Rm 11206. Consistent with UFSAR Figure 1.2-6, Tier 2 Table 3.6-2, Tier 2 Subsection 9A.3.1.1.1, and Tier 2 Table 12AA-201 describe Nuclear Island Rm 11205 as Reactor Vessel (RV) Nozzle Area. However, COL Appendix C Section 3.3, Item 5.c) and COL Appendix C Table 3.3-6, Item 5.c) incorrectly refer to PXS valve/accumulator Room A as Nuclear Island Rm “11205,” instead of “11206” thus (in four locations) “11205” is proposed to be replaced with “11206” in Section 3.3, Item 5.c) and Table 3.3-6, Item 5.c).
- s) Miscellaneous typing and spelling corrections:
- In Table 2.1.3-4, “Figure 2.1.3.2” is proposed to be replaced with “Figure 2.1.3-2.”
  - In Table 2.1.3-4 Dimension K, the minus sign “-“ is missing from the Acceptable Variation value, thus it is proposed that “+0.20/0.20” be replaced with “+0.20/-0.20”
  - In each of Figures 3.3-1 through -10, Note 1’s, “ELEVATERS” is proposed to be replaced with “ELEVATORS.”
  - In each of Figures 3.3-1 through -10, Note 3’s, “OT” is proposed to be replaced with “OF.”
  - In each of Figures 3.3-1, -2, -3, -4, -5, -7, -9 and -10, Note 3’s, “DESIDN” is proposed to be replaced with “DESIGN.”
  - In each of Figures 3.3-11A and 3.3-11B, Figure 3.3-12 through Figure 3.3-14, Note 2’s, “OT” is replaced with “OF,” and “DESIDN” is proposed to be replaced with “DESIGN.”
  - In Table 2.5.1-2 and Table 3.7-2, Ignitors” is proposed to be replaced with “Igniters.”

Note: There is no UFSAR Tier 2 change associated with any of the above proposed COL Appendix C changes.

The above proposed (editorial/consistency) changes maintain consistency between UFSAR (Tier 2), COL Appendix C, and plant-specific Tier 1 design descriptions, tables and figures and are considered to make no technical changes because no structure, system or component (SSC) design function or analysis as described in the UFSAR is affected; no defense-in-depth safety function is affected; and no plant-specific ITAAC line item is technically changed.

The plant-specific Tier 1 information is the design information and functions subject to verification by the Tier 1 and COL Appendix C ITAAC closure process. The proposed changes neither affect the ability to meet design criteria or functions, nor involve a decrease in the safety provided by the associated systems. Plant-specific Tier 1 information and ITAAC would continue to adequately validate their corresponding UFSAR (Tier 2) design commitments. Accordingly, application of the generic certified design information in Tier 1 as required by 10 CFR 52, Appendix D, Section III.B, in the particular circumstances discussed in this license amendment request is not necessary to achieve the underlying purpose of the rule.

The proposed changes do not involve a SSC, function or feature used in the prevention or mitigation of accidents or their safety / design analyses. The changes do not affect any SSC accident initiator or initiating sequence of events, or involve 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 changes do not result in a new failure mode, malfunction or sequence of events that could affect safety. The 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. No safety analysis or design basis acceptance limit or criterion would be challenged or exceeded.

In conclusion the proposed changes do not involve a technical (design, analysis, function or qualification) change, e.g., there is no change to an associated calculation, design parameter or design requirement. Therefore, the changes would not result in a decrease in plant safety.

The proposed changes associated with this license amendment request do not affect the containment, control, channeling, monitoring, processing or releasing of radioactive and non-radioactive materials. No effluent release path is involved. The types and quantities of expected effluents are not changed. Therefore, radioactive or non-radioactive material effluents should not be affected.

Plant radiation zones (as described in UFSAR Section 12.3) 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 should not change.

### **3. Technical Evaluation**

Contained within Section 2 of this License Amendment Request

#### **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 COL Appendix C information, and a corresponding change to plant-specific Tier 1 information; therefore, this activity requires an 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 Determination**

The proposed changes would amend the Combined Licenses (COLs) by making various non-technical changes to COL Appendix C information. The proposed changes would make editorial and consistency changes within COL Appendix C. No structure, system, or component (SSC), design function or analysis as described in the UFSAR would be affected. The COL Appendix C changes also involve proposed changes to the corresponding information in the plant-specific Tier 1. For each of the COL Appendix C changes proposed, the exemption necessary to implement the corresponding change to plant-specific Tier 1 is also requested in Enclosure 2. There is no UFSAR Tier 2 change associated with the proposed COL Appendix C changes.

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 COL Appendix C and corresponding plant-specific Tier 1 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, or 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 and corresponding plant-specific Tier 1 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 UFSAR, COL Appendix C, and the Tier 1 information. The proposed 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.

**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 and corresponding plant-specific Tier 1 update is considered non-technical for reasons discussed above, 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 reduce the 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**

In conclusion, 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.

**5. Environmental Consideration**

The proposed changes would revise the Combined Licenses (COLs) by making various non-technical editorial and consistency changes to COL Appendix C information. The proposed changes would correct editorial errors (e.g., typing, clerical, spelling, data entry, format, tag number changes) and/or consistency errors (e.g., inconsistencies between Updated Final Safety Analysis Report (UFSAR) (Tier 2) and Tier 1 information, and inconsistencies between 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 COL Appendix C changes also involve proposed changes to corresponding information plant-specific Tier 1. For each of the COL Appendix C changes, the exemption necessary to implement the corresponding changes in plant-specific Tier 1 is requested in Enclosure 2. There is no UFSAR Tier 2 change associated with the proposed changes.

A review 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 51.21 and 10 CFR 51.22(c)(9), in that:

(i) *There is no significant hazards consideration.*

As documented in Section 4.3, Significant Hazards Consideration Determination, 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 amendment makes editorial and consistency changes to plant-specific Tier 1 information. 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 amendment makes editorial and consistency changes to plant-specific Tier 1 information. Plant radiation zones (addressed 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 impacts 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 exemption is not required.

## 6. References

None