

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTORS

RELATED TO AMENDMENT NO. 24

TO THE COMBINED LICENSE NO. NPF-91

AND LICENSE NO. NPF-92

SOUTHERN NUCLEAR OPERATING COMPANY, INC

GEORGIA POWER COMPANY

OGLETHORPE POWER COMPANY

MUNICIPAL ELECTRIC AUTHORITY OF GEORGIA

CITY OF DALTON, GEORGIA

VOGTLE ELECTRIC GENERATING PLANT UNITS 3 AND 4

DOCKET NOS. 52-025 AND 52-026

1.0 INTRODUCTION

By letter dated March 27, 2014 (Agencywide Document Access and Management System (ADAMS) Accession No. ML14086A544), as revised by letter dated July 23, 2014 (ADAMS Accession No. ML14204A241), Southern Nuclear Operating Company, Inc. (SNC or licensee) submitted a license amendment request (LAR) requesting the U.S. Nuclear Regulatory Commission's (NRC or Commission) approval for changes to the Vogtle Electric Generating Plant (VEGP) Units 3 and 4 Emergency Plan, and to amend the combined licenses (COLs) for VEGP Unit 3 and VEGP Unit 4, COL numbers NPF-91 and NPF-92, respectively.

The proposed amendment will revise the VEGP Units 3 and 4 Emergency Plan to relocate the Operations Support Centers (OSCs) from the Control Support Areas of VEGP Units 3 and 4 to a common location shared with VEGP Units 1 and 2 in the Maintenance Support Building. In addition, the requested amendment proposes to revise the description of the plant monitoring and data handling systems for consistency with changes in the AP1000 plant design, and to revise related plant-specific emergency planning inspections, tests, analyses, and acceptance criteria (EP-ITAAC) accordingly.

The revision to the LAR, dated July 23, 2014 does not change the NRC staff's proposed determination of No Significant Hazards Considerations as it appeared in the *Federal Register* notice on May 13, 2014 (79 FR 27345, 27349-27350).

2.0 REGULATORY EVALUATION

The NRC staff considered the following regulatory requirements and guidance as outlined in Title 10 of the *Code of Federal Regulations* (10 CFR) in reviewing the licensee's LAR as previously described:

- 10 CFR 50.47(b) requires that the onsite emergency response plan meet the requirements of 16 planning standards as listed in that section.
- 10 CFR 50.47(b)(9) requires adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.
- 10 CFR 50.47(b)(4) requires that a standard emergency classification and emergency action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee.
- 10 CFR 50.47(b)(8) requires that adequate emergency facilities and equipment to support the emergency response are provided and maintained.
- 10 CFR 50.47(b)(10) requires that a range of protective actions has been developed for the plume exposure pathway Emergency Planning Zone (EPZ) for emergency workers and the public.
- 10 CFR 50.47(b)(14) requires that periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.
- 10 CFR 50.90 requires that an application for an amendment to the license must fully describe the changes requested, and follow as far as applicable, the form prescribed for original applications. 10 CFR 52.79 addresses content of technical information required in the application.
- 10 CFR 50, Appendix E provides additional requirements for emergency planning and emergency preparedness.
- 10 CFR 50, Appendix E, Section IV.E.8.a(ii) requires that the emergency facilities include an onsite Operations Support Center.
- 10 CFR 50, Appendix E, Section IV.E.2 requires that equipment for determining the magnitude of and for continuously assessing the impact of the release of radioactive materials to the environment is provided and described.
- 10 CFR Part 50, Appendix E, Section VI, "Emergency Response Data System," requires that a direct near real-time electronic data link between a licensee's onsite computer system and

the NRC Operations Center be provided for the automated transmission of a limited data set of selected parameters.

- 10 CFR 52.79(a)(21) requires that emergency plans comply with the requirements of 10 CFR 50.47 and 10 CFR Part 50, Appendix E.
- 10 CFR 52.97(b) requires that the Commission identify within the combined license the inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that, if met, are necessary and sufficient to provide reasonable assurance that the facility has been constructed and will be operated in conformity with the license, the provisions of the Act, and the Commission's rules and regulations.
- 10 CFR 52.98(f) requires NRC approval for any modification to, addition to, or deletion from the terms and conditions of a COL.
- NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," Revision 1, dated November 1980 (ADAMS Accession No. ML040420012), provides guidance in developing emergency plans to meet the 16 planning standards of 10 CFR 50.47(b).
- NUREG-0696, "Functional Criteria for Emergency Response Facilities," dated February 1981 (ADAMS Accession No. ML051390358), provides guidance regarding the criteria for an OSC.
- NUREG-0737, "Clarification of TMI Action Plan Requirements," Supplement 1, "Requirements for Emergency Response Capability," dated January 1983 (ADAMS Accession No. ML051390367), includes functional statements and recommended requirements for an OSC.
- NUREG-0800, Section 14.3.10, "Emergency Planning – Inspections, Tests, Analyses, and Acceptance Criteria," dated March 2007, provides guidance on developing inspections, tests, analyses, and acceptance criteria (ITAAC) related to emergency planning (EP-ITAAC).
- Regulatory Guide RG-1.206, "Combined License Applications for Nuclear Power Plants (LWR Edition)," Appendix C.II.I-B, "Development Guidance for Emergency Planning ITAAC," dated March 2007, describes generic EP-ITAAC.

3.0 TECHNICAL EVALUATION

The VEGP Units 3 and 4 Emergency Plan is being revised to change the location of the OSC, to update the description of the plant monitoring and data handling system for consistency with Revision 19 of the AP1000 design certification, and to make conforming changes to the EP-ITAAC.

3.1 Operations Support Center

10 CFR 50.47(b)(8) requires that a licensee provide and maintain adequate emergency facilities and equipment to support the emergency response. In addition, 10 CFR Part 50, Appendix E, Sections IV.E.8.a(ii) requires an onsite OSC for licensees. The licensee has proposed to consolidate the OSCs located in Units 3 and 4 to a single location at the Maintenance Support Building. This location would also be shared with Vogtle Units 1 and 2. To address this proposed change, the licensee proposed to revise Section H.1.2, "Operations Support Center"

of the VEGP Units 3 and 4 Emergency Plan to describe the proposed OSC and to note its use for VEGP Units 1, 2, 3, and 4. Section V1H.1.1 "Operations Support Center (OSC)" and Section V2H.1 "Emergency Facilities" of the VEGP Units 3 and 4 Emergency Plan would also be revised to note there would be no specific features of the OSC unique to Units 1 and 2 and to Units 3 and 4, respectively. Section H.3, "Activation and Staffing of Emergency Facilities" of the VEGP Units 3 and 4 Emergency Plan would also be revised to acknowledge the presence of a single OSC.

The staff reviewed the proposed revision to the OSC location in Section 2.1 of the LAR, "Location of the Operations Support Center (OSC)" and questioned whether the space provided would be able to accommodate the staff support for all four units including the technical staff to support the unique design differences between Units 3 and 4 and Units 1 and 2 and the displays of data and communications capabilities for each unit and reactor design. The staff requested the licensee clarify the communications capability of the OSC; specifically whether the OSC will have reliable voice communications with the control room, Technical Support Center (TSC), and Emergency Operations Facility (EOF). The licensee identified the Outage Control Center as the designated back-up space for the OSC should the Maintenance Support Building become uninhabitable. The staff requested the licensee describe whether this designated space has reliable voice communications capabilities with the control room, TSC, and EOF, and whether it has adequate capacity and supplies for personnel who may be located in this area. On June 23, 2014, the staff requested additional information from the licensee to address the staff's questions, in Request for Additional Information (RAI) Letter No. 1, eRAI 7540 (ADAMS Accession No. ML14174B413).

In its July 23, 2014, response to eRAI 7540, the licensee stated that the OSC will be sized to accommodate the technical and support staff for all four units at the VEGP site and that the facility would have communications capability to communicate with all four control rooms, the TSC, and the EOF. The licensee also proposed to revise Section H.1.2 "Operations Support Center," of the VEGP Units 3 and 4 Emergency Plan to state the OSC would be common to all four VEGP units and that it would be able to accommodate the technical and support staff to support an event on any or all of the units. The licensee also clarified that the back-up space for the OSC will have the same capabilities as the OSC including reliable voice communications with the control room, TSC, and EOF. The licensee further clarified that the back-up OSC space for Units 3 and 4, the Outage Control Center, will be a different location than the back-up OSC space for Units 1 and 2. Based on its review of the licensee's clarification of the OSC and revisions to Section H.1.2 of the VEGP Units 3 and 4 Emergency Plan, the staff finds that the proposed changes to the VEGP Units 3 and 4 Emergency Plan are acceptable, because they are consistent with the applicable requirements in 10 CFR Part 50, Appendix E, Section IV.E.8.a(ii), and provide for the VEGP Units 3 and 4 Emergency Plan to continue to meet the requirement in 10 CFR 50.47(b)(8) to provide and maintain adequate emergency response facilities.

3.2 Plant Monitoring and Data Handling Systems

10 CFR 50.47(b)(8) requires that a licensee provide and maintain adequate emergency facilities and equipment to support the emergency response. In addition, 10 CFR Part 50, Appendix E, Section IV.E.2 requires that a licensee provide the equipment for determining the magnitude of and for continuously assessing the impact from a release of radioactive materials to the environment. 10 CFR Part 50, Appendix E, Section VI, "Emergency Response Data System," requires that a direct near real-time electronic data link between a licensee's onsite computer system and the NRC Operations Center be provided for the automated transmission of a limited

data set of selected parameters. The licensee proposed to revise the description of certain plant monitoring and data handling systems, so that they are consistent with the current design description for the Westinghouse AP1000 Design Control Document, Revision 19.

3.2.1 Description of the Process Monitoring System

The licensee proposed to revise the description of the process monitoring system which will be used to initiate emergency actions and to conduct accident assessment (including the list of process variables available for display) to reflect the current VEGP Units 3 and 4 design. Specifically, the licensee proposed to revise Section V2H.4.3, "Process Monitoring," of the VEGP Units 3 and 4 Emergency Plan to reference the updated final safety analysis report (UFSAR) for the description of the process monitoring function and to reference UFSAR Table 7.5-1, "Post Accident Monitoring System" for the list of process variables available for display and to eliminate Table V2H-1, "Post Accident Monitoring Variables," and Figure V2H-1, "Instrument and Control Architecture" from the VEGP Units 3 and 4 Emergency Plan.

The licensee stated that the capability of the VEGP Units 3 and 4 systems [Protection and Safety Monitoring System (PMS), Plant Control System (PCS), Diverse Actuation System (DAS), Operation and Control Centers System (OCS), Data Display and Processing System (DDS), and Incore Instrumentation System (IIS)] to monitor and display information and parameters for determining the need to initiate emergency measures and to conduct post-accident assessments has not changed; the description of the systems has changed.

The licensee stated in Section 2.2 of the LAR that, "The current description provided in Section V2H.4.3 is based on a preliminary design description for the Westinghouse AP1000. Subsequent to the approval of the VEGP Units 3 and 4 Emergency Plan, continuing AP1000 detailed design development resulted in changes to the process monitoring system including the description of the instrument and control architecture (Figure V2H-1) and the list of process variables available for display (Table V2H-1).

The staff reviewed the proposed changes to Section V2H.4.3 of the VEGP Units 3 and 4 Emergency Plan (included in the LAR's Enclosure 2) and confirmed they were described in UFSAR Section 7.1 and evaluated in Chapter 7 of NUREG-1793, Supplement 2, "Final Safety Evaluation Report Related to Certification of the AP1000 Standard Plant Design, Docket No. 52-006." The staff concludes that deleting the detailed process monitoring information from the VEGP Unit 3 and Unit 4 Emergency Plan to reflect the current design and changing the reference to the post-accident monitoring variables does not change the capability to initiate emergency measures and to conduct post-accident assessments.

The staff finds the proposed changes acceptable because they are consistent with 10 CFR Part 50, Appendix E, Section IV.E.2, and provides for the VEGP Units 3 and 4 Emergency Plan to continue to meet the requirements in 10 CFR 50.47(b)(8) for a licensee to provide and maintain adequate emergency facilities and equipment to support the emergency response.

3.2.2 Emergency Response Data System (ERDS)

The licensee proposed to revise the description of the systems (PMS, SMS, PCS, DAS, OCS, DDS, and IIS) used to provide information for the ERDS to reflect the current design. The licensee stated that the capability of these systems has not changed and stated that deleting detailed ERDS information from the VEGP Units 3 and 4 Emergency Plan does not affect the ability of the systems to meet the applicable regulatory requirement.

The licensee proposed a change to Section V.2H.4.4 “Emergency Response Data System,” of the VEGP Units 3 and 4 Emergency Plan to reflect the current design. Specifically, the licensee proposed to delete detail regarding how the ERDS would operate.

The staff reviewed the proposed change to Section V2H.4 of the VEGP Units 3 and 4 Emergency Plan (included in LAR Enclosure 2), and the NRC staff’s technical evaluation of the VEGP Units 3 and 4 Emergency Plan and the VEGP communication system in NUREG-1923, “Safety Evaluation Report for an Early Site Permit (ESP) at the Vogtle Electric Generating Plant (VESP) ESP Site” (NRC, 2009) and NUREG-2124, “Final Safety Evaluation Report Related to the Combined Licenses for Vogtle Electric Generating Plan, Units 3 and 4” (NRC, 2012), respectively. The licensee proposed EP-ITAAC 3.2 which states, in part, that a test will be performed of communications capabilities including ERDS, and the acceptance criteria includes, in part, that an access port for ERDS is provided.

The staff finds the proposed change acceptable because it will allow for VEGP Units 3 and 4 to continue to have a direct near real-time electronic data link between the licensee’s onsite computer system and the NRC Operations Center to provide for the automated transmission of a limited data set of selected parameters consistent with the requirements in 10 CFR Part 50, Appendix E, Section VI.

3.2.3 Safety Parameter Display System

The licensee proposed to revise the description of the safety parameter display system (SPDS) to reflect the current design. The licensee stated that the capability of this system has not changed and that the resources’ ability to meet the requirements of a SPDS is unaffected.

The licensee proposed a change to Section V.2H.4.5 “Safety Parameter Display System,” of the VEGP Units 3 and 4 Emergency Plan to reflect the current design. Specifically, the licensee proposed to refer to VEGP Units 3 and 4 UFSAR, Revision 3, Subsection 18.8.2 for a description of how the SPDS is integrated into the design of the AP1000 human system interface resource.

The staff confirmed that the proposed changes to Section V2H.4.5 “Safety Parameter Display System” of the VEGP Units 3 and 4 Emergency Plan (included in LAR Enclosure 2) were described in UFSAR Subsection 18.8.2, “Safety Parameter Display System” and evaluated in Section 18.8 of the final safety evaluation report for VEGP Units 3 and 4.

The staff finds the proposed changes acceptable because they are consistent with 10 CFR Part 50, Appendix E, Section IV.E.2, and provide for the VEGP Units 3 and 4 Emergency Plan to continue to meet the requirements in 10 CFR 50.47(b)(8) for a licensee to provide and maintain adequate emergency facilities and equipment to support the emergency response.

3.3 Emergency Planning (EP) ITAAC

The licensee proposed conforming changes to eight EP-ITAAC as described below. 10 CFR 52.97(a)(2)(b) requires the Commission to identify within the COL, the inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that, if met, are necessary and sufficient to provide reasonable assurance that the facility has been constructed and will be operated in conformity with the license, the provisions of the Act, and the Commission’s rules and regulations.

3.3.1 Emergency Classification and Emergency Action Level – EP-ITAAC E.3.9.01.01.01

The licensee proposed to revise Acceptance Criterion 1.1.1 for EP-ITAAC E.3.9.01.01.01 in Appendix C to the VEGP Units 3 and 4 COLs. The licensee proposed to reference Table 7.5-1 in the UFSAR for the design certification criteria instead of Table V2H-1, “Post Accident Monitoring Variables” in the VEGP Units 3 and 4 Emergency Plan. The licensee stated that the current description of the process monitoring system and the list of process variables available for display is based on a preliminary design for the Westinghouse AP1000 as described above in Section 3.2.1.

The staff compared the content of Table V2H-1, “Post Accident Monitoring Variables” with VEGP Units 3 and 4 UFSAR Table 7.5-1, “Post-Accident Monitoring System” and with Revision 19 of the AP1000 DCD (referred to herein as the DCD) as evaluated in NUREG-1793, Supplement 2, “Final Safety Evaluation Report Related to Certification of the AP1000 Standard Plant Design, Docket No. 52-026,” and confirmed they were identical. Therefore, the staff finds the proposed change acceptable.

3.3.2 Emergency Classification and Emergency Action Level – EP-ITAAC E.3.9.01.01.02

The licensee proposed to delete EP-ITAAC E.3.9.01.01.02, related to emergency action levels (EALs), from Appendix C to the VEGP Units 3 and 4 COLs. The licensee stated that this EP-ITAAC was originally approved with the VEGP Units 3 and 4 early site permit (ESP) Permit No. ESP-004, issued in August 2009, because a complete set of emergency action levels was not yet available.

The staff confirmed that the COLs for VEGP Units 3 and 4, include a license condition requiring the licensee to provide to NRC a fully developed set of plant-specific EALs for each unit in accordance with Nuclear Energy Institute (NEI) 07-01, “Methodology for Development of Emergency Action Levels, Advanced Passive Light Water Reactors,” Revision 0, with no deviations. This license condition is in Section D.(12)(d) in the COLs.

The staff finds the proposed change acceptable because the licensee will continue to provide plant-specific EALs for VEGP Units 3 and 4 following NEI 07-01, Revision 0, consistent with 10 CFR Part 50, Appendix E, Section IV.B.1 in accordance with Section D.(12)(d) of the VEGP Units 3 and 4 COLs.

3.3.3 Technical Support Center and Onsite Operations Support Center – EP-ITAAC E.3.9.05.01.03

The licensee proposed to revise Acceptance Criterion 5.1.3 of Table E.3.9-5 for EP-ITAAC E.3.9.05.01.03 in Appendix C to the VEGP Units 3 and 4 COLs. The licensee proposed to reference Table 7.5-1 of the UFSAR for the design certification criteria instead of Table V2H-1, “Post Accident Monitoring Values” in the VEGP Units 3 and 4 Emergency Plan. The licensee stated that the current description of the process monitoring system and the list of process variables available for display is based on a preliminary design for the Westinghouse AP1000 as described above in Section 3.2.1.

The staff compared the content of Table V2H-1, "Post Accident Monitoring Values" with UFSAR Table 7.5-1, "Post-Accident Monitoring System" and the AP1000 DCD Revision 19, and confirmed that they were identical. Therefore, the staff finds the proposed change acceptable.

3.3.4 Technical Support Center and Onsite Operations Support Center – EP-ITAACE 3.9.05.01.05

In the LAR, the licensee proposed to change Acceptance Criterion 5.1.5 in EP-ITAAC E.3.9.05.01.05, in Appendix C to the VEGP Unit 3 and 4 COLs for an emergency facility location. The licensee proposed to locate the OSC within the Maintenance Support Building. Specifically, as discussed in Section 3.1 above, the licensee proposed to change the OSC location from that of adjacent to the passage from the Annex Building to the control room to a location in the Maintenance Support Building.

The licensee also proposed, in the July 23, 2014 revision, to delete EP-ITAAC E.3.9.05.01.05 from Table E.3.9-5, Unit 4 COL Appendix C because a common OSC was proposed and its location would be verified by Unit 3 EP-ITAAC E.3.9.05.01.05. In RAI 7540, Question 13.03-05, the staff asked the licensee to clarify if EP-ITAAC E.3.9.05.01.05 should also be deleted from the ITAAC table for Unit 4 (Table E.3.9-5).

In its July 23, 2014 revision, in response to eRAI 7540, the licensee clarified that EP-ITAAC E.3.9.05.01.05 should be deleted from Table E.3.9-5, Unit 4 COL Appendix C because this EP-ITAAC would be verified on VEGP Unit 3. The licensee stated that deletion of VEGP Unit 4 EP-ITAAC 3.9.05.01.05 is consistent with the approach used for the verification of common emergency preparedness facilities.

The staff finds the proposed changes acceptable because they are consistent with 10 CFR Part 50, Appendix E, Section IV.E.2, and continue to provide for the VEGP Units 3 and 4 Emergency Plan to meet the requirements in 10 CFR 50.47(b)(8) for a licensee to provide and maintain adequate emergency facilities and equipment to support the emergency response. Therefore, the staff finds that it is acceptable to (1) change Acceptance Criterion 5.1.5 in EP-ITAAC E.3.9.05.01.05, in Appendix C to the VEGP Unit 3 COL for an emergency facility location as the revised location of the OSC would be within the Maintenance Support Building, and (2) delete ITAAC 3.9.05.01.05 for Unit 4 to be replaced with a "Program Commitment" to state, "Verified on VEGP Unit 3."

3.3.5 Emergency Operations Facility – EP-ITAAC E.3.9.05.02.02

The licensee proposed to revise Acceptance Criterion 5.2.2 of Table E.3.9-5 for EP-ITAAC E.3.9.05.02.02 in Appendix C to the VEGP Unit 3 and 4 COLs. The licensee proposed to refer to UFSAR Table 7.5-1, "Post-Accident Monitoring System" instead of Table V2H-1, "Post Accident Monitoring Values" in the VEGP Units 3 and 4 Emergency Plan. The licensee stated that the current description of the process monitoring system and the list of process variables available for display is based on a preliminary design for the Westinghouse AP1000 as described above in Section 3.2.1.

The staff compared the content of Table V2H-1, "Post Accident Monitoring Values" with UFSAR Table 7.5-1, "Post-Accident Monitoring System" and with the NRC staff's DCD for the AP1000, Revision 19, and confirmed they were identical. Therefore, the staff finds the proposed change acceptable.

3.3.6 Radiological Assessment – EP-ITAAC E.3.9.06.00.01

The licensee proposed to revise Acceptance Criterion 6.1 of Table E.3.9-5 for EP-ITAAC E.3.9.06.01.01 in Appendix C to the VEGP Units 3 and 4 COLs. The licensee proposed to reference Table 7.5-1 in the UFSAR instead of Table V2H-1, “Post Accident Monitoring Values” in the VEGP Units 3 and 4 Emergency Plan. The licensee stated that the current description of the process monitoring system and the list of process variables available for display is based on a preliminary design for the Westinghouse AP1000 as described above in Section 3.2.1.

The staff compared the content of Table V2H-1, “Post Accident Monitoring Values” with UFSAR Table 7.5-1, “Post-Accident Monitoring System” and with the NRC staff’s DCD, Revision 19, and confirmed they were identical. Therefore, the staff finds the proposed change acceptable.

3.3.7 Warn and Advise Onsite Individuals of an Emergency – EP-ITAAC E.3.9.07.01.02

The licensee proposed to revise Acceptance Criterion 7.1.2 in Table E.3.9-7 for ITAAC E.3.9.07.01.02 in Appendix C to the VEGP Units 3 and 4 COLs to delete discussion of the ability to transfer emergency direction and to replace the deleted discussion with the following text: “Demonstrate the ability to notify and advise onsite personnel including: non-essential personnel, visitors, contractor and construction personnel; and other personnel within the owner controlled area.”

The staff confirmed that the acceptance criterion proposed for deletion was identified in COL Appendix C for VEGP Units 3 and 4 under EP-ITAAC E.3.9.08.01.01, Acceptance Criterion 8.1.1, Section C, Item 1.a. The proposed insertion meets the requirements of 10 CFR 50.47(b)(10) in that it demonstrates that a range of protective actions has been developed for the plume exposure EPZ for emergency workers and the public.

The staff finds the proposed change acceptable because the licensee will continue to take protective actions for onsite personnel including workers and the public consistent with the requirements in 10 CFR Part 50, Appendix E, Section IV.B.1.

3.3.8 Notification Time – EP-ITAAC E.3.9.08.01.01

The licensee proposed to revise Acceptance Criterion 8.1.1(B)(1) in Table E.3.9-8 in COL Appendix C for VEGP Units 3 and 4 to change the time requirement for completing notifications for an onsite exercise objective.

Specifically, the licensee proposed to change the time requirement in the standard criteria to demonstrate the ability to alert, notify, and mobilize site emergency response personnel from 5 minutes to 10 minutes.

The staff finds the proposed change acceptable because it is consistent with 10 CFR Part 50, Appendix E, Section IV.B.2, and continues to provide for the licensee to establish and maintain the capability to assess, classify, and declare an emergency condition within 15 minutes after an EAL has been exceeded.

3.4 Conclusion

Based on the technical evaluations above, the NRC staff concludes that, with the proposed changes to the VEGP Units 3 and 4 Emergency Plan there is reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency at VEGP Units 3 and 4; and therefore, the VEGP Units 3 and 4 Emergency Plan continues to meet the requirements of 10 CFR 50.47(b) and Appendix E to 10 CFR Part 50. In addition, the proposed revision to the description of the plant monitoring and data handling systems for consistency with changes in the AP1000 plant design are acceptable since these systems continue to meet the requirements of 10 CFR 50.47(b)(9) for assessing and monitoring actual or potential offsite consequences of radiological emergency conditions. Finally, the revisions to the plant-specific EP-ITAAC are acceptable since the EP-ITAAC continue to meet 10 CFR 52.97(b) which requires that the Commission identify within the combined license the inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that, if met, are necessary and sufficient to provide reasonable assurance that the facility has been constructed and will be operated in conformity with the license, the provisions of the Act, and the Commission's rules and regulations.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations in 10 CFR 50.91(b)(1), the Georgia State official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20, "Standards for Protection Against Radiation." The NRC staff has determined that the amendment involves no significant increase in the amounts – and no significant change in types – of any effluents that may be released offsite. Also, there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (FRN published on May 13, 2014 (79 FR 27345, 27349-27350)). The amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Under 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

Based on the considerations discussed above, the staff concludes that there is reasonable assurance that (1) the proposed operation will not endanger public health and safety, (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 public health and safety. Therefore, the staff finds the proposed changes to the VEGP Units 3 and 4 Emergency Plan to relocate the OSCs from the Control Support Areas of VEGP Units 3 and 4 to a common location shared with VEGP Units 1 and 2 in the Maintenance Support Building, the proposed revision to the description of the plant monitoring and data handling systems and the proposed revision to the EP-ITAAC to be acceptable.

7.0 REFERENCES

1. Southern Nuclear Operating Company's letter to U.S. Nuclear Regulatory Commission, "Request for License Amendment: Revision to Vogtle Units 3 and 4 Emergency Plan and Plant-Specific Emergency Planning ITAAC (LAR 14-004)," dated March 27, 2014 (SNC Letter No. ND-14-0413) (ADAMS Accession No. ML14086A544).
2. U.S. Nuclear Regulatory Commission's letter to Southern Nuclear Operating Company, "Request for Additional Information Letter No. 01 Related to License Amendment Request (LAR 14-004), Emergency Plan and Plant-Specific Emergency Planning Inspections, Tests, Analyses and Acceptance Criteria, for the Vogtle Electric Generating Plant Units 3 and 4 Combined Licenses," dated June 23, 2014 (E-Mail) (ADAMS Accession No. ML14174B413).
3. U.S. Nuclear Regulatory Commission letter to Southern Nuclear Operating Company, "Request for Additional Information Letter No. 02 Related to License Amendment Request (LAR 14-004), Emergency Plan and Plant-Specific Emergency Planning Inspections, Tests, Analyses and Acceptance Criteria, for the Vogtle Electric Generating Plant Units 3 and 4 Combined Licenses," dated July 1, 2014 (E-Mail) (ADAMS Accession No. ML14182A619).
4. Southern Nuclear Operating Company's letter to the U.S. Nuclear Regulatory Commission, "Response to Request for Additional Information – Request for License Amendment: Revision to the Vogtle Units 3 and 4 Emergency Plan and Plant-Specific Emergency Planning ITAAC (LAR 14-004S)," dated July 23, 2014 (SNC Letter No. ND-14-1086) (ADAMS Accession No. ML14204A241).
5. U.S. Nuclear Regulatory Commission, NUREG-1923, "Safety Evaluation Report for an Early Site Report (ESP) at the Vogtle Electric Generating Plant (VEGP) ESP Site," dated July, 2009.
6. Westinghouse AP1000 Design Control Document Revision 19, dated June 3, 2011, (ADAMS Accession No. ML11171A500).
7. U.S. Nuclear Regulatory Commission, NUREG-1793, Supplement 2, "Final Safety Evaluation Report Related to Certification of the AP1000 Standard Plant Design, Docket No. 52-006," dated September 2011.
8. U.S. Nuclear Regulatory Commission, NUREG-2124, "Final Safety Evaluation Report Related to the Combined Licenses for Vogtle Electric Generating Plant, Units 3 and 4," dated September 2012.
9. Vogtle Electric Generating Plant Updated Final Safety Analysis, Revision 3, dated June 20, 2014 (ADAMS Accession Number ML14183A994)