



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 13, 2015

Mr. C. R. Pierce
Regulatory Affairs Director
Southern Nuclear Operating Company, Inc.
Post Office Box 1295, Bin - 038
Birmingham, AL 35201-1295

SUBJECT: VOGTLE ELECTRIC GENERATING PLANT – REQUEST FOR ADDITIONAL
INFORMATION ON MULTIPLE TECHNICAL SPECIFICATION CHANGES
(TAC NOS. MF4515 AND MF4516)

Dear Mr. Pierce:

By letter dated July 18, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14203A124), Southern Nuclear Operating Company, Inc. (the licensee) submitted a license amendment request for the Vogtle Electric Generating Plant, Units 1 and 2, to adopt various previously approved Technical Specifications Task Force Travelers. In order to continue the review, the U.S. Nuclear Regulatory Commission staff requests additional information as discussed in the Enclosure. It is requested that your response be provided within forty-five (45) days of the date of this letter.

Sincerely,

A handwritten signature in cursive script that reads "Robert Martin".

Robert Martin, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-424, 50-425

cc: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION (RAI)

REQUEST TO INCORPORATE 23 APPROVED

TECHNICAL SPECIFICATION TASK FORCE (TSTF) TRAVELERS IN

TECHNICAL SPECIFICATIONS (TS)

VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2 (VEGP)

1. RAI 3.1.4-1 for TSTF-110 and TS 3.1.4, Surveillance Requirement (SR) 3.1.4.1:

The proposed changes include a change to the FREQUENCY of SR 3.1.4.1. The license amendment request (LAR) includes an accurate markup for SR 3.1.4.1 in the TS, but does not contain a mark-up for the Bases for SR 3.1.4.1, which is found on page B3.1.4-10 of the current Vogtle TS Bases. The NRC staff requests that a markup for the Bases be provided.

2. RAI 3.1.7-1 for TSTF-234 and TS 3.1.7, Actions table Note, Required Action B.1:

The proposed change includes the insertion of Condition B in the TS and Bases, which is consistent with the Standard Technical Specification (STS). However, the third paragraph of the Condition B insertion ends with a reference to "(Ref. 4)." The current VEGP TS Bases for Section 3.1.7, as reflected on the mark-up page B3.1.7-6, only has 2 references in the References section. The NRC staff requests that this inconsistency be addressed and that References 3 and 4 be provided for evaluation if applicable.

3. RAI 3.4.11-1 for TSTF-247 and TS 3.4.11 Bases, Action F.1:

TS 3.4.11 Condition F and Required Actions are revised to allow a separate limiting condition for operability (LCO) entry for each inoperable block valve. The NRC staff noted the following editorial errors in the Bases discussion of the revised Action F.1:

1. In the heading, "F.2 and F.3" are no longer applicable
2. In the first sentence, there is an extra "restore"

The NRC staff requests that the licensee correct these errors.

4. RAI 3.4.11-2 for TSTF-284 and SR 3.4.11.1 Bases:

SR 3.4.11.1 requires block valve cycling to verify the valve can be closed. The SR is modified by two notes, and the Bases discussion of the notes is different from the TSTF discussion in three places:

1. The second Bases paragraph in the TSTF begins, "This SR modified by two notes," while the proposed sentence says, "This SR has two notes."
2. The first sentence of the TSTF Insert A is missing and needs to be included; it begins, "Opening the block valve in this condition ..."

3. The next sentence of the TSTF reads, "Note 2 modifies this SR to ..." The proposed sentence is missing the word "modifies" which needs to be included.

These changes need to be made, consistent with the approved TSTF.

5. RAI 3.9.4-1 with respect to TSTF-312 and LCO 3.9.4 Statement:

To explain the difference between TSTF-312-A requirements and the proposed changes to VEGP TS 3.9.4 and its associated Bases, the licensee states that LCO 3.9.4.b was previously amended to allow the emergency and personnel airlocks to remain open during CORE ALTERATIONS or during movement of irradiated fuel assemblies within the containment, and that the scope of this previous amendment (VEGP Amendments 92/70, dated November 30, 1995) overlaps the scope of TSTF-312-A, resulting in the statement of LCO 3.9.4 and its associated bases not being identical to those presented in TSTF 312 A.

The staff reviewed the referenced Amendments 92/70, and noted that the emergency air lock was not included in the scope of Amendments 92/70. The NRC staff further noted that only the requirements for the personnel airlock are considered in TSTF-312-A since the emergency air lock normally has not been used for personnel entry into or exit from inside of the containment during a plant refueling outage. In addition, the NRC staff noted that no discussion was provided for the open equipment hatch in the application.

The staff requests that the licensee identify the VEGP license amendments that approved allowing the equipment hatch and the emergency airlock to remain open during CORE ALTERATIONS and during movement of irradiated fuel assemblies within the containment.

6. RAI 3.9.4-2 with respect to TSTF-312:

TSTF-312-A includes a Reviewer's Note that identifies the need for a confirmatory fuel handling accident (FHA) dose calculation that is accepted by the NRC staff, and that indicates acceptable radiological consequences. This Reviewer's note also states "the time to close such penetrations or combination of penetrations shall be included in the confirmatory dose calculations." In the application, the licensee only provides a commitment to incorporate the time needed to close open containment penetration(s) into the existing VEGP FHA dose calculations.

The NRC staff requests that the licensee submit the revised FHA dose calculations for its review as part of the application, or provide justification that a confirmatory FHA dose calculation is not needed for the open containment penetrations.

7. RAI 5.5.17-1 with respect to TSTF-343 and TS 5.5.17:

To explain the difference between TSTF-343-A changes in STS requirements and the proposed changes to VEGP TS 5.5.17 requirements, the licensee states that the changes identified for VEGP TS 5.5.6, "Prestressed Concrete Containment Tendon Surveillance Program," and conforming changes to the TS Bases for SR 3.6.1.2 and a reference to RG 1.35 are not adopted because those changes are already reflected in the current VEGP TS and Bases. The applicable VEGP license amendment numbers for those changes were not stated in the application. Similarly, conforming changes to the TS Bases for SR 3.6.1.1, due to the proposed

change to inspection requirements for the steel liner plate, are not adopted in this license amendment request. Further, the NRC staff noted that the application does not discuss TSTF-343-A changes related to inspection requirements for the containment outside concrete surfaces.

The NRC staff requests that the licensee address all other proposed changes in TSTF-343-A that are not proposed for adoption by this license amendment request, and identify the applicable VEGP license amendments that approved those changes for incorporation into the VEGP TS.

8. RAI 5.5.17-2 with respect to TSTF-343 and TS 5.5.17:

In Enclosure 4 of the application, the licensee provides the clean-typed TS pages. The NRC staff noted the following:

1. On Page 5.5-16, a paragraph break was inserted in error after "10 CFR 50, Appendix J," in the first paragraph of Specification 5.5.17, and
2. On Page 5.5-17, an existing Item 4 regarding an extension of Type A test frequency to "15 years", was replaced with the addition of the proposed change under TSTF-343-A. There is no discussion in the application for the removal of the existing Item 4. The staff requests that the licensee address the above two discrepancies.

9. RAI 3.9.6-1 with respect to TSTF-349 and LCO 3.9.6 Statement:

The LCO 3.9.6 Statement is revised to add a second Note permitting all residual heat removal (RHR) pumps to be de-energized for no more than 15 minutes when switching from one RHR train to another.

In the revised Bases discussion of the new LCO Note the NRC staff noted that in the second sentence of the added paragraph, parentheses are placed around "and the core outlet temperature is limited to > 10 degrees F below saturation temperature" for no apparent reason. In accordance with the Writer's Guide, parentheses are used to indicate clarifying details for the preceding text.

The NRC staff requests that the licenses explain the use of parentheses in this case.

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/RA/

Robert Martin, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-424, 50-425

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ADAMS Accession No.: ML14363A154

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