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

September 8, 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, UNITS 1 AND 2 – REQUEST FOR ADDITIONAL INFORMATION ON TECHNICAL SPECIFICATION END STATES (TAC NOS. MF6197 AND MF6198)

Dear Mr. Pierce:

By letter dated April 13, 2015, Southern Nuclear Operating Company (SNC, the Licensee) submitted a License Amendment Request (LAR) which proposed changes to its Vogtle Electric Generating Plant (VEGP), Units 1 and 2 Technical Specifications (TS). The proposed amendment would modify the TS requirements for end states associated with the implementation of the approved Technical Specification Task Force (TSTF) traveler TSTF-432-A, Revision 1, "Change in Technical Specifications End States, WCAP-16294," dated November 29, 2010. TS Action End States modifications would permit, for some systems, entry into a hot shutdown (Mode 4) end state rather than a cold shutdown (Mode 5) end state that is the current TS requirement.

The regulations under 10 CFR 50.36 (c)(2)(i) state that Limiting Conditions for Operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility (emphasis added). When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the TSs until the condition can be met. The U.S. Nuclear Regulatory Commission (NRC) staff finds that the proposed remedial action of allowing an end state of Mode 4 for a loss of both control room emergency filtration system trains in lieu of a shutdown to Mode 5, is not consistent with approved TSTF-432 and was not adequately justified in the LAR.

The NRC staff requests that SNC revise its proposed end state change to be consistent with the approved TSTF-432, or provide technical basis for the subject change as currently proposed in the application.

Sincerely,

Bob Martin

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

Docket Nos. 50-424 and 50-425

Enclosure:
Request for additional information

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REQUEST FOR ADDITIONAL INFORMATION (RAI)

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

ADOPTION OF TSTF-432, REVISION 1,

"CHANGE IN TECHNICAL SPECIFICATIONS END STATES (WCAP-16294)"

By letter dated April 13, 2015, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15128A239), Southern Nuclear Operating Company (SNC, the Licensee) submitted a License Amendment Request (LAR) which proposed changes to its Vogtle Electric Generating Plant (VEGP), Units 1 and 2 Technical Specifications (TS). According to the licensee, the proposed amendment would modify the TS requirements for end states associated with the implementation of the approved Technical Specification Task Force (TSTF) traveler TSTF-432-A, Revision 1, "Change in Technical Specifications End States, WCAP-16294," dated November 29, 2010, (ADAMS Accession No. ML103360003). TS Actions End States modifications would permit, for some systems, entry into a hot shutdown (Mode 4) end state rather than a cold shutdown (Mode 5) end state that is the current TS requirement.

Discussion:

The U.S. Nuclear Regulatory Commission (NRC) staff's review of the licensee's application determined that the proposed end state change for TS Limiting Conditions for Operation (LCO) 3.7.10, "Control Room Emergency Filtration System (CREFS) – Both Units Operating," and TS LCO 3.7.11, "CREFS - One Unit Operating," are not consistent with the approved TSTF-432 changes as explained below:

LCOs 3.7.10, Condition D and LCO 3.7.11 Condition F relate to a loss of both or one or more of CREFS trains due to inoperable control room envelope (CRE) boundary.

Conditions A, B and C in LCO 3.7.10 and Conditions A thru E in LCO 3.7.11 relate to a loss of both or one or more trains for reasons other than Condition D or F, respectively.

Required Action F.3 in LCO 3.7.10 or H.2 in LCO 3.7.11 currently places the unit in MODE 5 within 37 hours or 36 hours, respectively, when Required Action and associated Completion Time (for all Conditions) not met. The licensee's proposed end state change is to be in Mode 4 in 12 hours for these Required Actions.

The NRC staff's approved safety evaluation (ADAMS Accession No. ML100770146, dated March 29, 2010) as well as the TSTF-432, Revision 1, dated November 29, 2010 (ADAMS Accession No. ML103360003) justify an end state allowance for a loss of one or two CREFS trains due to inoperable control room envelope boundary in MODE 1, 2, 3, or 4. The proposed end state change to Required Action F.3 or H.2, if approved, would apply to all subject LCOs Conditions including those which are not associated with an inoperable CRE boundary, whereas, the TSTF allows the end state allowance specifically for a Condition associated with an inoperable CRE boundary only. Hence, the proposed change is not consistent with the approved TSTF-432 change.

Enclosure

Furthermore, Standard Technical Specifications (NUREG-1431, Revision 4), LCO 3.7.10, Condition F, Required Action F.1 requires to enter LCO 3.0.3 when two CREFS trains are inoperable in MODE 1, 2, 3, or 4 for reasons other than Condition B. (Condition B relates to a loss of one or more CREFS trains due to inoperable CRE boundary in MODE 1, 2, 3, or 4.)

Request for Additional Information:

The NRC staff requests the licensee to revise its proposed end state change to be consistent with the approved TSTF-432, or provide technical basis for the subject change as currently proposed in the application.

Regulatory Basis

The regulations under 10 CFR 50.36 (c)(2)(i) state that Limiting Conditions for Operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility (emphasis added). When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met. The licensee's proposed remedial action of allowing an end state of Mode 4 for a loss of both CREF trains in lieu of a shutdown to Mode 5, is not consistent with approved TSTF-432 and was not adequately justified in the licensee's application.

The NRC staff requests that SNC revise its proposed end state change to be consistent with the approved TSTF-432, or provide technical basis for the subject change as currently proposed in the application.

Sincerely,

/RA/

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

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