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July XX, 2016

Docket Nos.: 52-025
52-026

ND-16-XXXX
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
Request for License Amendment:
Addition of Interim Amendment Request Process to
License Condition 2.D.(1) (LAR-16-XXXX)**

Ladies and Gentlemen:

Pursuant to 10 CFR 52.98(f) and in accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC), requests an amendment to the combined licenses (COLs) for Vogtle Electric Generating Plant (VEGP) Units 3 and 4 (License Numbers NPF-91 and NPF-92, respectively). The requested amendment proposes to add to License Condition 2.D.(1) of the Vogtle Units 3 and 4 COLs an Interim Amendment Request process for changes during construction when emergent conditions are present.

This request arises from SNC's three years of experience with the change control processes outlined in 10 CFR Part 52, Appendix D, and from its experience with the *Interim Staff Guidance on Changes during Construction Under 10 CFR Part 52* (ISG-025). As the first Part 52 licensee, SNC has identified an approach to alleviate some of the administrative burdens for both the NRC and the Licensee for certain changes during construction when emergent conditions are present.

Enclosure 1 provides the description, technical evaluation, regulatory evaluation (including the Significant Hazards Consideration determination) and environmental considerations for the proposed changes. Enclosure 2 provides markups depicting the requested changes to the VEGP Units 3 and 4 COLs requiring NRC staff approval.

SNC requests NRC staff approval of the license amendment by November 15, 2016, and would implement the amendment within 30 days of approval of the requested changes. This license amendment is not tied to any particular construction activity; however, any delay in the issuance would also delay the benefits.

This letter and its enclosures contain no regulatory commitments. In accordance with 10 CFR 50.91, SNC is notifying the State of Georgia by transmitting a copy of this letter and its enclosures to the designated State Official.

Should you have any questions, please contact Ms. Amy C. Chamberlain at (205) 992-6361.

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/ACC/ljs

Sworn to and subscribed before me this _____ day of _____, 2016

Notary Public: _____

My commission expires: _____

- Enclosures
- 1) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Request for License Amendment Regarding Addition of Interim Amendment Request Process License Condition 2.D.(1) (LAR-16-XXXX)
 - 2) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Proposed Changes to Licensing Basis Documents (LAR-16-XXXX)

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Southern Nuclear Operating Company

ND-16-XXXX

Enclosure 1

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

**Request for License Amendment Regarding
Addition of Interim Amendment Request Process to
License Condition 2.D.(1) (LAR-16-XXXX)**

DRAFT

(This Enclosure consists of 11 pages, including this cover page)

ND-16-XXXX

Enclosure 1

Request for License Amendment Regarding Addition of Interim Amendment Request Process to License Condition 2.D.(1) (LAR-16-XXXX)

Table of Contents

1. Summary Description
2. Detailed Description
3. Technical Evaluation
4. Regulatory Evaluation
 - 4.1. Applicable Regulatory Requirements/Criteria
 - 4.2. Precedent
 - 4.3. Significant Hazards Consideration
 - 4.4. Conclusions
5. Environmental Considerations

DRAFT

Pursuant to 10 CFR 52.98(f) and in accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC), the licensee for Vogtle Electric Generating Plant (VEGP) Units 3 and 4, requests an amendment to Combined License (COL) Numbers NPF-91 and NPF-92, for VEGP Units 3 and 4, respectively.

1. Summary Description

This license amendment request (LAR) proposes to add to Condition 2.D.(1) of the Vogtle 3 and 4 COLs an Interim Amendment Request (IAR) process to allow construction to continue when a non-conforming condition that has little to no safety significance is discovered and the work activity cannot be adjusted to allow construction to proceed until the non-conforming condition is resolved. In such emergent situations, SNC proposes to file an Interim Amendment Request with the NRC that includes an oath or affirmation, a description of the proposed change, a review of no significant hazards consideration determination (10 CFR 50.92), a review of categorical exclusion from environmental review (10 CFR 51.22(c)), and a Nuclear Construction Safety Assessment (NCSA). The NCSA would identify the scope of the proposed change, evaluate whether emergent conditions are present, evaluate whether the proposed change would result in any material decrease in safety, and evaluate whether continued construction would make the non-conforming condition irreversible. Upon review of the Interim Amendment Request, the NRC would issue a notification stating whether it had any objection to SNC proceeding with construction while SNC prepares to initiate the LAR/PAR process outlined in COL-ISG-025.

This enclosure requests approval of the license amendment necessary to add to Condition 2.D.(1) of the Vogtle 3 and 4 COLs.

SNC requests NRC staff approval of the license amendment by November 15, 2016, and would implement the amendment within 30 days of approval of the requested changes. This license amendment is not tied to any particular construction activity; however, any delay in the issuance would also delay the benefits.

2. Detailed Description

Condition 2.D.(1) of the Vogtle 3 and 4 COLs, "Changes During Construction," effectuates the LAR/PAR process outlined in COL-ISG-025. The LAR/PAR process outlined in COL-ISG-025 was established "[f]or the purpose of maintaining license basis configuration control and in order to avoid unnecessary construction delays related to changes during construction" COL-ISG-025 allows a licensee to use the LAR/PAR process "as a precursor to the normal LAR process" when the licensee determines that a proposed change or modification requires NRC approval. According to COL-ISG-025, "[t]he PAR process addresses anticipated plant changes and modification as well as emergent plant changes."

The LAR/PAR process has supported construction thus far. However, because the LAR/PAR process requires NRC to accept the associated LAR for technical review prior to issuing a no-objection letter on the PAR, ISG-025 does not adequately address emergent plant changes. SNC is proposing to add a license condition that establishes a process to enable SNC to continue construction, at its own risk, in emergent situations, where a non-conforming condition

is discovered that has little or no safety significance and the work activity cannot be adjusted, to allow construction to proceed until the non-conforming condition is resolved.

The proposed addition to Condition 2.D.(1) is set forth in Enclosure 2 to this LAR. This addition would add an Interim Amendment Request process. Use of the Interim Amendment Request process would be limited to situations where non-conforming conditions are identified during construction, and where a NCSA determination concludes that the proposed change would result in no material decrease in safety and that continued construction would not make the non-conforming condition irreversible. Each Interim Amendment Request would include 1) an oath or affirmation; 2) a description of the proposed change; 3) a review of no significant hazards consideration determination (10 CFR 50.92); 4) a review of categorical exclusion from environmental review (10 CFR 51.22(c)); and 5) a Nuclear Construction Safety Assessment (NCSA). Additionally, each Interim Amendment Request would identify the proposed duration of continued construction before the LAR/PAR process must be initiated.

Each NCSA would 1) identify the scope of the proposed change; 2) evaluate whether emergent conditions are present; 3) evaluate whether the proposed change would result in any material decrease in safety; and 4) evaluate whether continued construction would make the non-conforming condition irreversible. Emergent conditions would be defined as those that were not discovered until actual construction began and the work activity could not be adjusted to allow construction to proceed until the non-conforming condition was resolved. The evaluation of whether the proposed change would result in any material decrease in safety would consider whether the change would:

- 1) Result in more than a minimal increase in the frequency of occurrence of an accident previously evaluated in the plant-specific DCD or in the final safety analysis report (as updated);
- 2) Result in more than a minimal increase in the likelihood of occurrence of a malfunction of a structure, system, or component (SSC) important to safety and previously evaluated in the plant-specific DCD or in the final safety analysis report (as updated);
- 3) Result in more than a minimal increase in the consequences of an accident previously evaluated in the plant-specific DCD or in the final safety analysis report (as updated);
- 4) Result in more than a minimal increase in the consequences of a malfunction of an SSC important to safety previously evaluated in the plant-specific DCD or in the final safety analysis report (as updated);
- 5) Create a possibility for an accident of a different type than any evaluated previously in the plant-specific DCD or in the final safety analysis report (as updated);

- 6) Create a possibility for a malfunction of an SSC important to safety with a different result than any evaluated previously in the plant-specific DCD or in the final safety analysis report (as updated);
- 7) Result in a design basis limit for a fission product barrier as described in the plant-specific DCD or in the final safety analysis report (as updated) being exceeded or altered; or
- 8) Result in a departure from a method of evaluation described in the plant-specific DCD or in the final safety analysis report (as updated) used in establishing the design bases or in the safety analyses.

To use the Interim Amendment Request process, SNC must provide prompt notification to the NRC. Additionally, any construction completed pursuant to an Interim Amendment Request no-objection letter would be entirely at the risk of SNC. If the associated LAR is subsequently denied, SNC must return the facility to its Current Licensing Basis.

The Interim Amendment Request process is not intended to supplant the current LAR/PAR process. Rather, the Interim Amendment Request process would result in a letter from the NRC stating whether it has any objection to SNC proceeding with the proposed change while SNC prepares to initiate the LAR/PAR process. An NRC "No Objection" determination on the Interim Amendment Request would not be a pre-determination of "No Objection" on the future PAR. Additionally, the NRC "No Objection" determination of the Interim Amendment Request would not serve as pre-approval of the associated LAR on its technical merits, nor would the determination imply any NRC approval of the LAR. The NRC's Interim Amendment Request No-Objection letter would include an expiration date, after which construction for the scope of work covered in the Interim Amendment Request could not continue unless SNC initiates the LAR/PAR process outlined in COL-ISG-025. If the PAR process is initiated in a timely manner, SNC may continue with the proposed change until NRC issues its written PAR notification. Upon NRC's issuance of its written PAR notification, NRC's Interim Amendment Request no-objection letter would be terminated and continued construction would be subject to the NRC's written PAR notification. If SNC does not initiate the PAR process prior to the expiration of the NRC's Interim Amendment Request No-Objection letter, SNC would be required to stop construction for the scope of work covered in the Interim Amendment Request.

3. Technical Evaluation

SNC's proposal to add an Interim Amendment Request process to Condition 2.D.(1) of the Vogtle 3 and 4 COLs is not a modification, addition to, or removal of any plant structures, systems, or components (SSC). Further, the proposed amendment is not a change to procedures or method of control of the nuclear plant or any SSCs. Because the proposed amendment does not change the design, construction, or operation of any SSCs, it does not adversely affect any design function as described in the Updated Final Safety Analysis Report.

Rather, SNC proposes a process change, whereby SNC may seek a determination from the NRC that it has no objection to SNC continuing construction in emergent situations when certain

criteria are met prior to submittal of a LAR/PAR pursuant to ISG-025 or a LAR. Prior to any construction continuing under an Interim Amendment Request No-Objection letter, SNC must submit a NCSA determination, concluding that the proposed change will not result in any material decrease in safety and that continued construction would not make a non-conforming condition irreversible. The proposed change will be evaluated further subject to the review requirements for a LAR/PAR pursuant to ISG-025 or a LAR. If the related LAR is subsequently denied, SNC would be required to return the plant to its current licensing basis.

4. Regulatory Evaluation

4.1 Applicable Regulatory Requirements/Criteria

10 CFR 52.98(f) requires Nuclear Regulatory Commission (NRC) approval for any modification to, addition to, or deletion from the terms and conditions of a Combined License (COL). This proposal involves an addition to Condition 2.D.(1) of the Vogtle 3 and 4 COLs; therefore, NRC approval is required prior to the addition.

4.2 Precedent

The NRC issued COL-ISG-025, Interim Staff Guidance on Changes During Construction Under 10 CFR Part 52, to “avoid unnecessary construction delays related to changes during construction . . . arising after the issuance of the COL and before the 10 CFR 52.103(g) finding. . .” ISG-025 sets up a license amendment request (LAR) preliminary amendment request (PAR) process through which a licensee can “request a notification that the NRC has no objection to the licensee installing and testing the proposed changed design feature pending NRC’s review of the LAR.” NRC’s review of a PAR/LAR under ISG-025 includes a review of the PAR’s no significant hazards consideration determination, categorical exclusion from environmental review, and impact on Inspections, Tests, analyses, and Acceptance Criteria (ITAAC), as well as a verification that the PAR is accurately reflected in the LAR, to ensure the health and safety of the public and the common defense and security will be retained.

SNC’s proposal would add a step to the existing LAR/PAR process to address emergent conditions. SNC’s proposal to add an Interim Amendment Request would authorize construction to continue, at SNC’s risk, while a LAR/PAR is being prepared, where the proposed change is determined to have no safety significance. SNC’s proposal is consistent with the LAR/PAR process outlined in ISG-025, allowing construction to continue in limited circumstances, where a NCSA determination is made that there is little to no impact to safety associated with the proposed change. Construction pursuant to an Interim Amendment Request No Objection determination would continue only until the LAR/PAR process is initiated and NRC has taken some action on the LAR/PAR, in accordance with ISG-025.

4.3 Significant Hazards Consideration

The proposed amendment would add an Interim Amendment Request process to Condition 2.D.(1) of the Vogtle 3 and 4 COLs. The Interim Amendment Request process

would be limited to emergent situations and would be accompanied by a Nuclear Construction Safety Assessment (NCSA) which would evaluate: the scope of the proposed change, whether emergent conditions are present, whether the proposed change would result in any material decrease in safety, and whether continued construction would make the non-conforming condition irreversible.

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 amendment would add an Interim Amendment Request process to Condition 2.D.(1) of the Vogtle 3 and 4 COLs to allow construction to continue, at SNC's own risk, in emergent conditions, where a non-conforming condition that has little or no safety significance is discovered and the work activity cannot be adjusted. The Interim Amendment Request process would require SNC to submit a Nuclear Construction Safety Assessment which 1) identifies the proposed change; 2) evaluates whether emergent conditions are present; 3) evaluates whether the change would result in any material decrease in safety; and 4) evaluates whether continued construction would make the non-conforming condition irreversible. Only if the continued construction would have no material decrease in safety would the NRC issue a determination that construction could continue pending SNC's initiation of the ISG-025 PAR/LAR process. The requirement to include a Nuclear Construction Safety Assessment ensures that the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated. If the continued construction would result a material decrease in safety, then continued construction would not be authorized.

The proposed amendment does not modify the design, construction, or operation of any plant structures, systems, or components (SSC), nor does it change any procedures or method of control for any SSCs. Because the proposed amendment does not change the design, construction, or operation of any SSCs, it does not adversely affect any design function as described in the Updated Final Safety Analysis Report.

The proposed amendment does not affect the probability of an accident previously evaluated. Similarly, because the proposed amendment does not alter the design or operation of the nuclear plant or any plant SSCs, the proposed amendment does not represent a change to the radiological effects of an accident, and therefore, does not involve an increase in the consequences of an accident previously evaluated.

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 amendment would add an Interim Amendment Request process to Condition 2.D.(1) of the Vogtle 3 and 4 COLs to allow construction to continue, at SNC's own risk, in emergent conditions, where a non-conforming condition that has little or no safety significance is discovered and the work activity cannot be adjusted. The Interim Amendment Request process would require SNC to submit a Nuclear Construction Safety Assessment which 1) identifies the proposed change; 2) evaluates whether emergent conditions are present; 3) evaluates whether the change would result in any material decrease in safety; and 4) evaluates whether continued construction would make the non-conforming condition irreversible. Only if the continued construction would have no material decrease in safety would NRC issue a determination that construction could continue pending SNC's initiation of the ISG-025 PAR/LAR process.

The proposed amendment is not a modification, addition to, or removal of any plant SSCs. Furthermore, the proposed amendment is not a change to procedures or method of control of the nuclear plant or any plant SSCs. The proposed amendment only adds a new screening process and does not change the design, construction, or operation of the nuclear plant or any plant operations.

Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from an accident previously evaluated.

4.3.3 Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

The proposed amendment would add an Interim Amendment Request process to Condition 2.D.(1) of the Vogtle 3 and 4 COLs to allow construction to continue, at SNC's own risk, in emergent conditions, where a non-conforming condition that has little or no safety significance is discovered and the work activity cannot be adjusted. The Interim Amendment Request process would require SNC to submit a Nuclear Construction Safety Assessment which 1) identifies the proposed change; 2) evaluates whether emergent conditions are present; 3) evaluates whether the change would result in any material decrease in safety; and 4) evaluates whether continued construction would make the non-conforming condition irreversible. Only if the continued construction would have no material decrease in safety would the NRC issue determination that construction could continue pending SNC's initiation of the ISG-025 PAR/LAR process.

The proposed amendment is not a modification, addition to, or removal of any plant SSCs. Furthermore, the proposed amendment is not a change to procedures or method of control of the nuclear plant or any plant SSCs. The proposed amendment does not alter any design function or safety analysis. Consequently, no safety analysis or design basis acceptance limit/criterion is challenged or exceeded by the proposed amendment, thus the margin of safety is not reduced. The only impact of this activity is the addition of an Interim Amendment Request process.

Therefore, the proposed amendment does not involve a significant reduction in a 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. The above evaluations demonstrate that the requested changes can be accommodated without an increase in the probability or consequences of an accident previously evaluated, without creating the possibility of a new or different kind of accident from any accident previously evaluated, and without a significant reduction in a margin of safety.

Having arrived at negative declarations with regard to the criteria of 10 CFR 50.92, this assessment determined that the requested change does not involve a Significant Hazards Consideration.

5. Environmental Considerations

The details of the proposed changes are provided in Sections 2 and 3 of this licensing amendment request.

The proposed amendment would add an Interim Amendment Request process to Condition 2.D.(1) of the Vogtle 3 and 4 COLs. The Interim Amendment Request process would be limited to emergent situations and would be accompanied by a Nuclear Construction Safety Assessment which would evaluate: the scope of the proposed change, whether emergent conditions are present, whether the proposed change would result in any material decrease in safety, and whether continued construction would make the non-conforming condition irreversible.

A review has determined the proposed addition to the license condition requires an amendment to the COLs to amend Condition 2.D.(1) for Changes in Construction. However, facility construction and operation following implementation of the proposed

amendment do not involve (i) a significant hazards consideration; (ii) a significant change in the types or a significant increase in the amounts of any effluents that may be released offsite; or (iii) a significant increase in 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), in that:

(i) There is no significant hazards consideration.

As documented in Section 4.3, Significant Hazards Consideration, 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 only adds an Interim Amendment Request process; there is no physical change to the plant itself. The changes are unrelated to any aspects of plant construction or operation that would introduce any changes 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. Hence, the exemption does 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, 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 addition of an Interim Amendment Request process makes no physical change to the plant itself, nor does it affect how the plant is designed, constructed, or operated. Plant radiation zones (addressed in Section 12.3 of the Updated Final Safety Analysis Report) are not affected, and controls established under 10 CFR 20 to preclude a significant increase in occupational radiation exposure are not affected. Therefore, the proposed amendment does not involve a significant increase in individual or cumulative occupational radiation exposure.

ND-16-XXXX

Enclosure 1

Request for License Amendment Regarding Addition of Interim Amendment Request Process to License Condition 2.D.(1) (LAR-16-XXXX)

Based on the above review of the proposed amendment, it has been determined that anticipated construction and operational effects 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 amendment is not required.

DRAFT

Southern Nuclear Operating Company

ND-16-XXXX

Enclosure 2

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

**Proposed Changes to Licensing Basis Documents
(LAR-16-XXXX)**

**[Combined Operating License (COL) Page 4 for VEGP Unit 3 and Unit 4 are
replaced by the following Pages 4-1, and 4-2]**

Note: Added text is denoted by blue text

(This Enclosure consists of 3 pages, including this cover page)

D. The license is subject to, and SNC shall comply with, the conditions specified and incorporated below:

(1) Changes during Construction

- (a) SNC may request use of a preliminary amendment request (PAR) process, for license amendments, at any time before a Commission finding under 10 CFR 52.103(g). To use the PAR process, SNC shall submit a written request to the Office of New Reactors (NRO) in accordance with COL-ISG-025, "Changes during Construction under Part 52."
- (b) Before NRO's issuance of a written PAR notification, SNC shall submit the license amendment request (LAR). Thereafter, NRO will issue a written PAR notification, setting forth whether SNC may proceed in accordance with the PAR, LAR, and COL-ISG-025. If SNC elects to proceed and the LAR is subsequently denied, SNC shall return the facility to its current licensing basis.
- (c) SNC may request use of an interim amendment request (IAR) process, for license amendments, at any time before a Commission finding under 10 CFR 52.103(g) where the following emergent conditions are met:
 - (i.) SNC identifies a condition, which if continued, would not conform to the current licensing basis; and
 - (ii.) The work activity cannot be adjusted to allow construction to proceed while the condition is resolved.
- (d) Each IAR shall include:
 - (i.) Oath or affirmation;
 - (ii.) Description of the proposed change;
 - (iii.) Review of no significant hazards consideration determination (10 CFR 50.92)
 - (iv.) Review of categorical exclusion from environmental review (10 CFR 51.22(c));
 - (v.) Nuclear Construction Safety Assessment (NCSA); and
 - (vi.) Proposed expiration date.
- (e) Each NCSA must:
 - (i.) Identify the scope of the proposed change;
 - (ii.) Evaluate whether emergent conditions are present because:
 - a. The non-conforming condition was not discovered until actual construction began, and
 - b. The work activity cannot be adjusted to allow construction to proceed until the non-conforming condition is resolved;
 - (iii.) Evaluate whether the proposed change would result in any material decrease in safety, considering whether the proposed change would:

- a. Result in more than a minimal increase in the frequency of occurrence of an accident previously evaluated in the plant-specific DCD or in the final safety analysis report (as updated);
 - b. Result in more than a minimal increase in the likelihood of occurrence of a malfunction of a structure, system, or component (SSC) important to safety and previously evaluated in the plant-specific DCD or in the final safety analysis report (as updated);
 - c. Result in more than a minimal increase in the consequences of an accident previously evaluated in the plant-specific DCD or in the final safety analysis report (as updated);
 - d. Result in more than a minimal increase in the consequences of a malfunction of an SSC important to safety previously evaluated in the plant-specific DCD or in the final safety analysis report (as updated);
 - e. Create a possibility for an accident of a different type than any evaluated previously in the plant-specific DCD or in the final safety analysis report (as updated);
 - f. Create a possibility for a malfunction of an SSC important to safety with a different result than any evaluated previously in the plant-specific DCD or in the final safety analysis report (as updated);
 - g. Result in a design basis limit for a fission product barrier as described in the plant-specific DCD or in the final safety analysis report (as updated) being exceeded or altered; or
 - h. Result in a departure from a method of evaluation described in the plant-specific DCD or in the final safety analysis report (as updated) used in establishing the design bases or in the safety analyses; and
- (iv.) Evaluate whether continued construction would make the non-conforming condition irreversible.
- (f) Upon review of the IAR, NRO will issue an IAR notification stating whether the NRC has any objection to SNC proceeding with the proposed change, subject to strict conditions, while SNC prepares to initiate the PAR process outlined in Condition D.(1)(a). If the NRC determines it has no objection to SNC's IAR, SNC may proceed with the proposed change, at SNC's own risk. The NRC's Interim Amendment Request No-Objection letter would include an expiration date, after which construction for the scope of work covered in the IAR could not continue, unless SNC initiates the PAR process outlined in Condition D.(1)(a) prior to such expiration. If the PAR process is initiated in a timely manner, SNC may continue with the proposed change until NRC issues its written PAR notification. Upon NRC's issuance of its written PAR notification, NRC's IAR no objection notification is terminated and continued construction of the proposed change is subject to the NRC's written PAR notification. If SNC does not initiate the PAR process outlined in Condition D.(1)(a) prior to the expiration of NRC's IAR notification, continued construction for the scope of work covered in the IAR must stop.