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ND-16-1176
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10 CFR 52.63

U.S. Nuclear Regulatory Commission
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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4
Supplement to Request for License Amendment and Exemption:
Relocation of Air Cooled Chiller Pump 3, VWS-MP-03 (LAR-15-018S1)

Ladies and Gentlemen:

In accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC), the licensee for Vogtle Electric Generating Plant (VEGP) Units 3 and 4, requested an amendment to Combined License (COL) Numbers NPF-91 and NPF-92 for VEGP Units 3 and 4, respectively, by SNC letter ND-16-0252, dated April 26, 2016 [ADAMS Accession No. ML16117A531]. The requested amendment proposed to relocate Air-Cooled Chiller Pump 3 (Equipment Tag No. VWS-MP-03) and associated support equipment. This requires changes to the Updated Final Safety Analysis Report (UFSAR) plant-specific Design Control Document (DCD) Tier 2 and Tier 2* information, and involves changes to related plant-specific Tier 1 information. As noted in SNC's April 26, 2016 letter, the changes proposed in this license amendment request (SNC LAR-15-018) are consistent with and identical in technical content with the South Carolina Electric and Gas Company (SCE&G) License Amendment Request (LAR 13-31) submittal [ML15295A090] on this topic.

In a Public meeting on June 30, 2016, SCE&G discussed with the Nuclear Regulatory Commission (NRC) staff the responses to NRC talking points identified as "Summer_COL_eRAIs Email Number 139," (eRAI Email No. 139) which were provided in an NRC email to SCE&G dated June 17, 2016 [ML16169A158]. SCE&G provided a written response to eRAI Email No. 139 by letter dated July 14, 2016 [ML16196A354].

Because SNC LAR-15-018 is within the scope of NRC eRAI No. 139, SNC elects to provide the same technical response to these questions as those provided by SCE&G in their July 14, 2016 letter. The SNC response to eRAI Email No. 139 is found in Enclosure 4 of this letter, which supplements the original LAR-15-018. Enclosures 1 through 3 were provided in SNC letter ND-16-0252.

The information provided in Enclosure 4 clarifies the information provided in the original license amendment request (LAR-15-018), but does not change the scope of, nor affect the Technical Evaluation or the Significant Hazards Consideration determination in SNC's original license amendment request submitted on April 26, 2016. This letter contains no regulatory commitments.

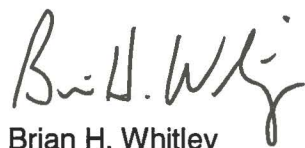
In accordance with 10 CFR 50.91, SNC is notifying the State of Georgia of this LAR supplement by transmitting a copy of this letter and enclosure to the designated State Official.

Should you have any questions, please contact Mr. Adam Quarles at (205) 992-7031.

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/NH/ljs

Sworn to and subscribed before me this 19 day of August, 2016

Notary Public: Mara Rainville Hamner

My commission expires: My Commission Expires February 18, 2020


MARA RAINVILLE HAMNER
Notary Public
Alabama State at Large

- Enclosures: 1) - 3) (previously submitted with SNC's original LAR, LAR-15-018, in SNC letter ND-16-0252)
- 4) Vogtle Electric Generating Plant (VEGP) Units 3 and 4, Response to NRC Talking Points in eRAI Email No. 139 regarding License Amendment Request (LAR) 15-018 (LAR-15-018S1)

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Southern Nuclear Operating Company

ND-16-1176

Enclosure 4

(Note that Enclosures 1 through 3 were provided with the original license amendment request, LAR-15-018, in SNC letter ND-16-0252)

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

**Response to NRC Talking Points in eRAI Email No. 139 regarding
License Amendment Request (LAR) 15-018**

(LAR-15-018S1)

(This enclosure contains three pages, including this cover page.)

Below are the South Carolina Electric and Gas Company (SCE&G) and Southern Nuclear Operating Company (SNC) responses to the NRC talking points pertaining to VCS LAR 13-31 S1 [ML16091A380], which were provided to SCE&G per Summer eRAI Email No. 139 [ML16169A158]. SCE&G provided these responses to Talking Points 2b and 3 in a letter dated July 14, 2016 [ML16196A354]

The responses to Talking Points 2b and 3 are discussed below. Additional text added to the LAR or exemption request is underlined in [blue](#).

NRC Talking Point 2b:

In addition, the same sentence goes on to say the relocation does not have an adverse impact on any structure, system, or component. Is this referring to any SSC, including nonsafety-related SSCs located in the Annex Building, or a subset of SSCs that are safety-related or otherwise necessary for responding to anticipated transients or postulated accident conditions?

SCE&G Response to Talking Point 2b:

LAR 13-31 proposes to relocate air cooled chiller pump 3 (VWS-MP-03) and its associated equipment from the Auxiliary Building to Annex Building Room 40500. The above question references a section of the LAR that should be referring to any "safety-related" SSC. As previously verified, Room 40500 of the Annex Building is seismic Category II in its entirety. Additionally, UFSAR Table 9A-3 shows Room 40500 containing no safety-related equipment. Therefore, a change needs to be made to describe that the relocation of VWS-MP-03 to Room 40500 does not have an adverse impact on any *safety-related* SSC.

The following paragraph replaces the third paragraph on Page 5 of 11 in Enclosure 1A (LAR 13-31 S1):

Relocating VWS-MP-03 from the seismic Category 1 Auxiliary Building to the seismic Category II Annex Building does not have an adverse impact on any [safety-related](#) structure, system, or component (SSC), because the VWS is a non-seismic system and is not designed to remain functional following a seismic event. The proposed change does not adversely affect the response of any [safety-related](#) SSC to anticipated transient or postulated accident conditions, because the portions of the VWS affected by this change do not serve a safety-related function, and are therefore not credited in the response to these conditions. The current Annex and Auxiliary Building flooding analyses address flooding from the chilled water system and the changes proposed by this activity do not alter the conclusions of these analyses. Therefore, the relocation of VWS-MP-03 and associated piping changes have no adverse impact on these flooding analyses.

Similarly, the following paragraph replaces the fourth paragraph on Page 3 of 7 in Enclosure 1B (LAR 13-31 S1):

Relocating VWS-MP-03 from the seismic Category 1 Auxiliary Building to the seismic Category II Annex Building does not have an adverse impact on any [safety-related](#) structure, system, or component (SSC), because the VWS is a non-seismic system and is not designed to remain functional following a seismic event. The proposed change does not adversely affect the response of any [safety-related](#) SSC to anticipated transient or postulated accident conditions, because the portions of the VWS affected by this change do not serve a safety-related function, and are therefore not credited in the response to these conditions. The current Annex

and Auxiliary Building flooding analyses address flooding from the chilled water system and the changes proposed by this activity do not alter the conclusions of these analyses. Therefore, the relocation of VWS-MP-03 and associated piping changes have no adverse impact on these flooding analyses.

SNC Response to Talking Point 2b:

SNC concurs with SCE&G's response to Talking Point 2b, and incorporates this response into SNC's LAR-15-018, with the following clerical changes: The change to the paragraph in the request for license amendment is on page 5 of 11 of Enclosure 1 of SNC's original LAR-15-018, rather than page 5 of 11 of Enclosure 1A (as per SCE&G's LAR 13-31 S1). The change to the paragraph in the exemption request is on page 3 of 6 of Enclosure 2 of SNC's original LAR-15-018, rather than page 3 of 7 of Enclosure 1B (as per SCE&G's LAR 13-31 S1).

Talking Point 3:

Potential editorial error: Page 7 of 11, first paragraph of Section 4.3. The last sentence states "...and involves associated changes to UFSAR Tier 2 information". Should this be Tier 2* information?

SCE&G Response to Talking Point 3:

The SCE&G response to Talking Point 3 concurred that this was an editorial error and thus should be "Tier 2*" information.

The following paragraph replaces the first paragraph of Section 4.3 on Page 7 of 11 in Enclosure 1A (LAR 13-31 S1):

The requested change(s) would revise VCSNS Units 2 and 3 Combined Licenses (COLs) by modifying the low capacity Central Chilled Water System (VWS). This change relocates Air Cooled Chiller Pump 3, VWS-MP-03, and associated equipment, from the Auxiliary Building to the Annex Building and adds a new chemical feed tank. This activity requires changes to Updated Final Safety Analysis Report (UFSAR) Tier 2 information, and involves associated changes to UFSAR Tier 2* information and VCSNS Units 2 and 3 COL Appendix C (and plant-specific Tier 1) information.

SNC Response to Talking Point 3:

SNC concurs with SCE&G's response to Talking Point 3; however, this talking point does not apply to SNC LAR-13-018, because this editorial error was corrected in SNC's original LAR.