

SAFETY EVALUATION BY THE OFFICE OF NEW REACTORS
RELATED TO AMENDMENT NO. 56
TO THE COMBINED LICENSE NOS. NPF-91 AND NPF-92
SOUTHERN NUCLEAR OPERATING COMPANY, INC.
GEORGIA POWER COMPANY
OGLETHORPE POWER CORPORATION
MEAG POWER SPVM, LLC
MEAG POWER SPVJ, LLC
MEAG POWER SPVP, LLC
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 June 3, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16155A366), Southern Nuclear Operating Company (SNC/licensee) requested that the U.S. Nuclear Regulatory Commission (NRC) amend the combined licenses (COL) for Vogtle Electric Generating Plant (VEGP) Units 3 and 4, COL Numbers NPF-91 and NPF-92, respectively.

As described in detail in Section 3.2, below, this license amendment request (LAR) 16-008 revises COL Appendix C and corresponding Tier 1 information (Figures 2.7.1-1 and 3.3-14; Tables 2.1.2-1, 2.2.1-1, 2.2.1-3, 2.2.2-1, 2.2.5-5, 2.3.10-3, 2.5.1-3, 3.2-1, and 3.7-1; and COL paragraph 2.D). The proposed changes would revise the COLs by making various nontechnical changes to COL Appendix C and the corresponding plant-specific Tier 1 information, an Updated Final Safety Analysis Report (UFSAR) Tier 2 change, and one typographical change to COL paragraph 2.D. The proposed changes would resolve inconsistencies (e.g., inconsistencies between UFSAR Tier 2, Tier 1 information, and the system design documentation). No structure, system, component (SSC), design function, or analysis as described in the UFSAR would be affected.

SNC has also requested an exemption from the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52, Appendix D, Section III.B, "Design Certification Rule for

the AP1000 Design, Scope and Contents,” to allow a departure from the elements of the certification information in Tier 1 of the generic Design Control Document (DCD).¹

The NRC staff’s proposed no significant hazards consideration determination was published in the *Federal Register* on August 2, 2016 (81 FR 50729).

In order to modify UFSAR (the plant-specific DCD) Tier 1 information, the NRC must find the licensee’s exemption request included in its submittal for the LAR acceptable. The staff’s review of both the exemption request and the license amendment request are included in this safety evaluation.

2.0 REGULATORY EVALUATION

10 CFR Part 52, Appendix D, Section VIII.A.4 states that exemptions from Tier 1 information are governed by the requirements of 10 CFR 52.63(b)(1) and 52.98(f). It also states that the Commission will deny such a request if the design change causes a significant reduction in the level of plant safety otherwise provided by the design.

10 CFR 52.63(b)(1) allows the licensee to request NRC approval for an exemption from one or more elements of the certification information. The Commission may only grant such a request if it complies with the requirements of 10 CFR 52.7, which in turn points to the requirements listed in 10 CFR 50.12 for specific exemptions, and if the special circumstances present outweigh the potential decrease in safety due to reduced standardization. Therefore, any exemption from the Tier 1 information certified by Appendix D to 10 CFR Part 52 must meet the requirements of 10 CFR 50.12, 52.7 and 52.63(b)(1).

10 CFR 52.98(f) states that any modification to, addition to, or deletion from the terms and conditions of a COL is a proposed amendment to the license. This includes any modification to, addition to, or deletion from the inspections, tests, analyses, and acceptance criteria (ITAAC) contained in the license. Appendix C of COLs NPF-91 and NPF-92 contain information which the licensee is proposing to modify. Therefore, the proposed change requires a license amendment.

3.0 TECHNICAL EVALUATION

3.1 EVALUATION OF EXEMPTION

INTRODUCTION

The regulations in Section III.B of Appendix D to 10 CFR Part 52 require a holder of a COL referencing Appendix D to 10 CFR Part 52 to incorporate by reference and comply with the requirements of Appendix D, including certified information in Tier 1 of the generic AP1000 DCD.

As defined in Section II of Appendix D to 10 CFR Part 52, Tier 1 information includes ITAAC

¹ While the licensee describes the requested exemption as being from Section III.B of 10 CFR Part 52, Appendix D, the entirety of the exemption pertains to proposed departures from Tier 1 information in the generic DCD. In the remainder of this evaluation, the NRC will refer to the exemption as an exemption from Tier 1 information to match the language of Section VIII.A.4 of 10 CFR Part 52, Appendix D, which specifically governs the granting of exemptions from Tier 1 information.

and design descriptions, among other things. Therefore, a licensee referencing Appendix D incorporates by reference all Tier 1 information contained in the generic DCD. The Tier 1 ITAAC and the design descriptions, along with the plant-specific ITAAC, were included in Appendix C of the COL at its issuance. The proposed amendment would allow changes to correct editorial errors in Tier 1 information, and promote consistency with the UFSAR Tier 2 information. The proposed changes impact Tier 1 of the Plant-Specific DCD and Appendix C of the COL, and therefore, pursuant to Section VIII.A.4 of Appendix D to 10 CFR Part 52, an exemption is needed because Section VIII.A.4 of Appendix D to 10 CFR Part 52 requires a licensee to obtain an exemption to depart from the Tier 1 information of the generic AP1000 DCD.

The end result of this exemption would be that the licensee can implement modifications to Tier 1 information described and justified in LAR 16-008 if and only if the NRC approves LAR 16-008. This is a permanent exemption limited in scope to the particular Tier 1 information specified.

As stated in Section VIII.A.4 of Appendix D to 10 CFR Part 52, an exemption from Tier 1 information is governed by the requirements of 10 CFR 52.63(b)(1) and 52.98(f). Additionally, the Commission will deny a request for an exemption from Tier 1 if it finds that the design change will result in a significant decrease in the level of safety otherwise provided by the design. Pursuant to 10 CFR 52.63(b)(1), the Commission may, upon application by an applicant or licensee referencing a certified design, grant exemptions from one or more elements of the certification information, so long as the criteria given in 10 CFR 52.7 are met, and that the special circumstances as defined by 10 CFR 52.7 outweigh any potential decrease in safety due to reduced standardization.

Pursuant to 10 CFR 52.7, the Commission may, upon application by any interested person or upon its own initiative, grant exemptions from the requirements of 10 CFR Part 52. 10 CFR 52.7 further states that the Commission's consideration will be governed by 10 CFR 50.12, an exemption may be granted when: (1) the exemptions are authorized by law, will not present an undue risk to public health or safety, and are consistent with the common defense and security; and (2) special circumstances are present. 10 CFR 50.12(a)(2) lists six special circumstances for which an exemption may be granted. It is necessary for one of these special circumstances to be present in order for NRC to consider granting an exemption request. The licensee stated that the requested exemption meets the special circumstances of 10 CFR 50.12(a)(2)(ii). That subsection defines special circumstances as when "[a]pplication of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule." The staff's analysis of each of these findings is presented below.

3.1.1 AUTHORIZED BY LAW

This exemption would allow the licensee to implement approved changes to COL Appendix C and corresponding Tier 1 information in Figures 2.7.1-1 and 3.3-14; Tables 2.1.2-1, 2.2.1-1, 2.2.1-3, 2.2.2-1, 2.2.5-5, 2.3.10-3, 2.5.1-3, 3.2-1, and 3.7-1; and COL paragraph 2.D. This is a permanent exemption limited in scope to the changes to Tier 1 information evaluated in Section 3.2 of this safety evaluation (SE), and subsequent changes to Tier 1 Figures 2.7.1-1 and 3.3-14; Tables 2.1.2-1, 2.2.1-1, 2.2.1-3, 2.2.2-1, 2.2.5-5, 2.3.10-3, 2.5.1-3, 3.2-1, and 3.7-1; and COL paragraph 2.D or any other Tier 1 information, would be subject to the exemption process specified in Section VIII.A.4 of Appendix D to 10 CFR Part 52. As stated above, 10 CFR Part 52, Appendix D, Section VIII.A.4 allows the NRC to grant exemptions from one or

more elements of the Tier 1 information. The NRC staff has determined that granting the licensee's proposed exemption will not result in a violation of the Atomic Energy Act of 1954, as amended, or the Commission's regulations. Therefore, as required by 10 CFR 50.12(a)(1), the exemption is authorized by law.

3.1.2 NO UNDUE RISK TO PUBLIC HEALTH AND SAFETY

The underlying purpose of Appendix D to 10 CFR Part 52 is to ensure that the licensee will construct and operate the plant based on the approved information found in the DCD incorporated by reference into the licensee's licensing basis. The changes do not add, delete, or modify systems or equipment as described in Tier 1 of the AP1000 DCD. These changes will not impact the ability of the structures to perform their design function. Because the changes will not alter the operation of any plant equipment or systems, these changes do not present an undue risk from existing equipment or systems. These changes do not add any new equipment or system interfaces to the current plant design. The description changes do not introduce any new industrial, chemical, or radiological hazards that would represent a public health or safety risk, nor do they modify or remove any design or operational controls or safeguards intended to mitigate any existing on-site hazards. Furthermore, the proposed changes would not allow for a new fission product release path, result in a new fission product barrier failure mode, or create a new sequence of events that would result in significant fuel cladding failures. Accordingly, these changes do not present an undue risk from any new equipment or systems. Therefore, as required by 10 CFR 50.12(a)(1), the staff finds that there is no undue risk to the public health and safety.

3.1.3 CONSISTENT WITH COMMON DEFENSE AND SECURITY

The proposed exemption would allow editorial and consistency changes to elements of the plant-specific Tier 1 DCD. This is a permanent exemption limited in scope to the changes to Tier 1 information evaluated in Section 3.2 of this SE. Subsequent changes to Figures 2.7.1-1 and 3.3-14; Tables 2.1.2-1, 2.2.1-1, 2.2.1-3, 2.2.2-1, 2.2.5-5, 2.3.10-3, 2.5.1-3, 3.2-1, and 3.7-1; and COL paragraph 2.D; or any other Tier 1 information would be subject to the exemption process in Section VIII.A.4 of Appendix D to 10 CFR Part 52. The change does not alter or impede the design, function, or operation of any plant SSCs associated with the facility's physical or cyber security, and therefore does not affect any plant equipment that is necessary to maintain a safe and secure plant status. In addition, the changes have no impact on plant security or safeguards. Therefore, as required by 10 CFR 50.12(a)(1), the staff finds that the common defense and security is not impacted by this exemption.

3.1.4 SPECIAL CIRCUMSTANCES

Special circumstances, in accordance with 10 CFR 50.12(a)(2)(ii), are present whenever application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule. The underlying purposes of the Tier 1 information is to ensure that the licensee will safely construct and operate the plant based on the certified information found in the AP1000 DCD, which was incorporated by reference into the licensee's licensing basis. The proposed changes to correct editorial and consistency issues between Tier 1 and Tier 2 maintain the functions of these systems. These changes will enable the licensee to safely construct and operate the AP1000 facility consistent with the design certified by the NRC, by clarifying the information found in Figures 2.7.1-1 and 3.3-14; Tables 2.1.2-1, 2.2.1-1, 2.2.1-3, 2.2.2-1, 2.2.5-5, 2.3.10-3, 2.5.1-3, 3.2-1, and 3.7-1; and COL paragraph 2.D. Therefore, because the application of the specified

Tier 1 information in this circumstance does not serve the underlying purpose of the rule, the staff finds that the special circumstances required by 10 CFR 50.12(a)(2)(ii) for the granting of an exemption from the Tier 1 information exist.

3.1.5 SPECIAL CIRCUMSTANCES OUTWEIGH REDUCED STANDARDIZATION

This exemption would allow the implementation of changes to COL Appendix C and corresponding Tier 1 information in Figures 2.7.1-1 and 3.3-14; Tables 2.1.2-1, 2.2.1-1, 2.2.1-3, 2.2.2-1, 2.2.5-5, 2.3.10-3, 2.5.1-3, 3.2-1, and 3.7-1; and COL paragraph 2.D proposed in the LAR. Based on the nature of the changes to the plant-specific Tier 1 information and the understanding that these changes resolve apparent editorial inconsistencies within the design basis, it is likely that other AP1000 licensees will request this exemption. However, if this is not the case, the special circumstances continue to outweigh any decrease in safety from the reduction in standardization because the key design functions of the systems associated with this request will continue to be maintained. The proposed changes demonstrate that the functionality of these systems continue to be maintained following implementation of the change from the generic AP1000 DCD; therefore, as required by 10 CFR Part 52.63(b)(1), the staff finds that the special circumstances outweigh the effects the departure has on the standardization of the AP1000 design.

3.1.6 NO SIGNIFICANT REDUCTION IN SAFETY

This exemption would allow the implementation of changes to COL Appendix C and corresponding Tier 1 information in Figures 2.7.1-1 and 3.3-14; Tables 2.1.2-1, 2.2.1-1, 2.2.1-3, 2.2.2-1, 2.2.5-5, 2.3.10-3, 2.5.1-3, 3.2-1, and 3.7-1; and COL paragraph 2.D proposed in the LAR. The changes for consistency and clarity will not impact the functional capabilities of these components. The proposed changes will not adversely affect the ability of the SSCs to perform their design functions and the level of safety provided by the SSCs is unchanged; therefore, as required by 10 CFR Part 52, Appendix D, Section VIII.A.4, the staff finds that granting the exemption would not result in a significant decrease in the level of safety otherwise provided by the design.

3.2 EVALUATION OF PROPOSED CHANGES

The information presented by the licensee in this LAR was evaluated by NRC staff for its completeness, quality, and clarity. No new technical review of the designated changes proposed to be modified by this LAR was required or performed. This is because the changes to Figures 2.7.1-1 and 3.3-14; Tables 2.1.2-1, 2.2.1-1, 2.2.1-3, 2.2.2-1, 2.2.5-5, 2.3.10-3, 2.5.1-3, 3.2-1, and 3.7-1; and COL paragraph 2.D, of Appendix C of the COL, are derived from Tier 2 information, and this Tier 2 information was reviewed during the evaluation of the AP1000 DCD and then incorporated by reference into SNC's COL application for VEGP Units 3 and 4. As part of this license amendment, SNC did not request any changes to design information; it merely requested changes to how the design information was described in Tier 1. The following paragraphs describe the staff's approach to review the LAR.

The staff reviewed the proposed changes and determined that the changes do not affect any of the information used or cited in the NRC's safety findings as documented in either the AP1000 DCD Final Safety Evaluation Report (FSER) or the VEGP Units 3 and 4 COL FSER. The proposed changes to Figures 2.7.1-1 and 3.3-14; Tables 2.1.2-1, 2.2.1-1, 2.2.1-3, 2.2.2-1, 2.2.5-5, 2.3.10-3, 2.5.1-3, 3.2-1, and 3.7-1; and COL paragraph 2.D, of Appendix C of the COL are to correct inconsistencies or editorial errors. There are no changes to the design, functional

capabilities, method for performing a function, design analysis, safety analysis, or UFSAR Tier 2 information involved, and thus, the requested Tier 1 changes do not affect any design functions. The proposed changes do not involve a change to the method of evaluation for establishing design bases or safety analyses. Tests, experiments and procedures described in the licensing basis were not changed by these departures.

- *Table 2.1.2-1*

In Table 2.1.2-1 of Appendix C of the COL, the licensee seeks to revise the design requirements of the flow sensors within the reactor coolant system (RCS) to include that they are required to be environmentally qualified for harsh environments. The staff verified that the proposed changes, to identify that the flow sensors are required to be both Class 1E and environmentally qualified for harsh environments, accurately reflect the Tier 2 information depicted in UFSAR Table 3.11-1. These changes do not involve a physical change to the plant or changes to the original design function of the plant. The staff reviewed the updated information, and confirmed that it provides consistency between Tier 1 and Tier 2. Additionally, because the change is to be environmentally qualified for harsh environments, this is more conservative and is acceptable.

- *Table 2.2.1-1*

In Table 2.2.1-1 of Appendix C of the COL, the licensee seeks to revise the tag number for the Fuel Transfer Tube from "FHS-FT-001" to "FHS-FT-01," and to include the motor-operated valve (MOV) designation for two valves, VFS-PL-V800A and VFS-PL-V800B. The staff verified that the proposed changes accurately reflect the Tier 2 information depicted in UFSAR Tables 3.2-3, 3.9-16, 3.11-1, and 6.2.3-1. These changes do not involve physical changes to the plant or changes to the original design function of the plant. The staff reviewed the updated information, and confirmed that it provides consistency between Tier 1 and Tier 2.

- *Table 2.2.1-3*

In Table 2.2.1-3 of Appendix C of the COL, the licensee seeks to revise the maximum closure time for remotely operated containment isolation valves from 20 seconds to 10 seconds. The staff verified that the proposed change accurately reflects the Tier 2 information depicted in UFSAR Tables 14.3-7 and 6.2.3-1 and Technical Specifications Bases B 3.6.3. The staff reviewed the updated information, and confirmed that it provides consistency between Tier 1 and Tier 2. Additionally, because the change is reducing the valve closure time, this is more conservative and is acceptable.

- *Table 2.2.2-1*

In Table 2.2.2-1 of Appendix C of the COL, the licensee seeks to include the MOV designation for valve PCS-PL-V001C, identifying it as "PCCWST Isolation Valve MOV." The staff verified that the proposed change accurately reflects the Tier 2 information depicted in UFSAR Tables 3.9-16, 3.11-1, and 6.2.2-3. This change does not impact equipment or system functionality or change the original design function of the plant. The staff reviewed the updated information, and confirmed that it provides consistency between Tier 1 and Tier 2.

- *Table 2.2.5-5*

In Table 2.2.5-5 of Appendix C of the COL, the licensee seeks to revise the Design Commitment identifier from “7d)” to “7.d)” and to replace a comma at the end of a sentence with a period. The staff verified that the proposed changes are completely editorial in nature and are not a concern. These changes have no impact on the ITAAC performance itself or the underlying technical information.

- *Table 2.3.10-3*

In Table 2.3.10-3 of Appendix C of the COL, the licensee seeks to revise the title of the column “Control Function” to “Active Function.” The staff verified that the proposed change accurately reflects the language in Tier 1, Section 2.3.10 and the associated ITAAC, referring to the performance of an “active function.” This change does not impact equipment or system functionality or change the original design function of the plant. The staff reviewed the updated information, and confirmed that it provides consistency.

- *Table 2.5.1-3*

In Table 2.5.1-3 of Appendix C of the COL, the licensee seeks to revise the tag numbers of “PLS-ET001” and “PLS-ET002” to “PLS-001” and “PLS-002,” respectively. The staff verified that the proposed changes are consistent with the remainder of the information within the table and editorial in nature. Since the changes deal with the input channel designator and not the equipment itself, no issue exists. These changes do not impact equipment or system functionality or change the original design function of the plant. The staff reviewed the updated information, and confirmed that it provides consistency.

- *Figure 2.7.1-1*

In Figure 2.7.1-1 of Appendix C of the COL, the licensee seeks to revise the tag numbers of the Nuclear Island Nonradioactive Ventilation System (VBS) valves VBS-PL-V188 and VBS-PL-V189 to depict VBS-PL-V189 upstream of VBS-PL-V188. The staff verified that the proposed change accurately reflects the Tier 2 information depicted in UFSAR Figure 9.4.1-1 and underlying AP1000 design documentation. Because the valves are completely identical, there is no impact to the functionality of the VBS. The staff reviewed the updated information, and confirmed that it provides consistency between Tier 1 and Tier 2.

- *Table 3.2-1*

In Table 3.2-1 of Appendix C of the COL, the licensee seeks to remove the unnecessary parenthetical phrase referring to the acceptance criteria of Design Commitment 3 in Acceptance Criterion 1.b. The staff verified that the proposed change accurately reflects the staff’s review and closure of Design Commitment 3, documented in NUREG-1793 “Final Safety Evaluation Report Related to Certification of the AP1000 Standard Plant Design Docket No. 52-006,” Supplement 2 (ADAMS Accession No. ML11293A077). The reference in ITAAC 3.2.00.01.b to Design Commitment 3 was originally provided as information to ensure the relationship between ITAAC were understood. It did not add or subtract from the scope or intent of ITAAC 3.2.00.01.b. Deleting the reference is acceptable because:

- With closure of Design Commitment 3, human factors engineering (HFE) design detail used as the input to HFE design verification is complete. The design verification can proceed because precursor design activities are complete.
- The scope and intent of ITAAC 3.2.00.01.b remain the same regardless of whether the reference is maintained or deleted. Deleting the reference improves the clarity of the ITAAC because it removes an obsolete reference.

- *Figure 3.3-14*

In Figure 3.3-14 of Appendix C of the COL, the licensee seeks to revise a key dimension, identified as “X6,” from the dimension measured from the shield building centerline to the inner surface of the shield building wall, to the dimension measured from the shield building centerline to the outer surface of the shield building wall. The staff verified that the proposed changes accurately reflects the information depicted in Tier 1 Table 3.3-5. This change does not impact equipment or system functionality or change the original design function of the plant. The staff reviewed the updated information, and confirmed that it provides consistency.

- *Table 3.7-1*

In Table 3.7-1 of Appendix C of the COL, the licensee seeks to revise the tag number for the Reactor Vessel Insulation Water Inlet and Steam Vent Devices components, from “RCS-MN-01” to “RXS-MN-01.” The staff verified that the proposed change accurately reflects the correct system acronym for the Reactor System (RXS).

Additionally, the licensee seeks to revise the tag numbers in Table 3.7-1 for both the DAS Processor Cabinet and Control Panel, from “OCS-JC-020” to “OCS-JC-20,” and the MCR 1E Displays and System Level Controls, from “OCS-JC-010” and “-011” to “OCS-JC-10” and “-11.” The staff verified that the proposed changes accurately reflects the underlying design documentation that identifies these tags without the “0” preceding the two-digit equipment identifier.

These changes do not impact the design or the components themselves or change the original design function of the plant. The staff reviewed the updated information, and confirmed that revising both Tier 1 Table 3.7-1 and Tier 2 information in UFSAR Table 17.4-1, where the same issues exists, provides consistency between Tier 1 and Tier 2.

- *COL paragraph 2.D*

In COL paragraph 2.D(12)(g)1, the licensee seeks to revise the reference from AP1000 DCD, Revision 19, Section 3.7.3.5 to Section 3.7.5.3. The staff verified that the proposed change accurately references the correct section of the AP1000 DCD, Revision 19. The COL item is meant to be for the seismic interaction analysis in AP1000 DCD, Revision 19 to reflect as-built information, which must be based on as-procured data, as well as as-constructed condition. The typographical error does not have any safety significance and does not involve any technical changes to the COL.

None of the above proposed changes represent any technical changes to the design, construction, or operation of the plant. No structure, system, component, design function, or analysis, as described in the UFSAR, is affected.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations in 10 CFR 50.91(b), 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. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that 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 (81 FR 50729, published on August 2, 2016). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

Because the exemption is necessary to allow the changes proposed in the license amendment, and because the exemption does not authorize any activities other than those proposed in the license amendment, the environmental consideration for the exemption is identical to that of the license amendment. Accordingly, the exemption meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the exemption.

6.0 CONCLUSION

The NRC staff has determined that pursuant to Section VIII.A.4 of Appendix D to 10 CFR Part 52, the exemption (1) is authorized by law, (2) presents no undue risk to the public health and safety, (3) is consistent with the common defense and security, (4) is a special circumstance that outweighs the reduction in standardization, and (5) does not significantly reduce the level of safety at the licensee's facility. Therefore, the staff grants the licensee an exemption from the Tier 1 information specified by the licensee in LAR 16-008 and evaluated in Section 3.2 of this SE.

Based on the considerations discussed in Section 3.2, and confirming that these changes do not change an analysis methodology, assumptions, or the design itself; the Staff concluded that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that 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. Therefore, the staff finds the changes proposed in this license amendment acceptable.

7.0 REFERENCES

1. Request for License Amendment and Exemption 16-008: Tier 1 Editorial and Consistency Changes, letters from Southern Nuclear Operating Company, dated June 3, 2016 (ADAMS Accession No. ML16155A366).

2. VEGP Updated Final Safety Analysis Report (UFSAR), Revision 4, dated July 13, 2015 (ADAMS Accession No. ML15194A443).
3. AP1000 Design Control Document, Revision 19, dated June 13, 2012 (ADAMS Accession No. ML11171A500).
4. VEGP FSER, dated August 5, 2011 (ADAMS Accession No. ML110450302, ML111950510).
5. FSER Related to Certification of the AP1000 Standard Plant Design, NUREG-1793, Supplement 2, dated August 5, 2011 (ADAMS Accession No. ML112061231).