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September 14, 2016

Docket No.: 52-025

ND-16-1721
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 Unit 3
Preliminary Amendment Request (PAR):
Column Line 7.3 Wall Reinforcement Area Change (PAR-16-024)

Ladies and Gentlemen:

The U.S. Nuclear Regulatory Commission (NRC) issued the Vogtle Electric Generating Plant (VEGP) Unit 3 combined license (COL) (License No. NPF-91) to Southern Nuclear Operating Company (SNC) on February 10, 2012.

By SNC letter ND-16-1610, dated September 13, 2016, SNC submitted License Amendment Request (LAR), LAR-16-024, to revise the VEGP Unit 3 Updated Final Safety Analysis Report (UFSAR) to depart from the provided minimum reinforcement area in the column line 7.3 wall for elevation 82'-6" to 100'-0".

SNC is submitting a Preliminary Amendment Request (PAR), PAR-16-024, to minimize construction delays for VEGP Unit 3 during the NRC's evaluation of the related LAR. The determination of whether the NRC has any objection to SNC proceeding with construction based on the proposed plant licensing basis change identified in the LAR is requested on or before September 21, 2016. Construction activities for the column line 7.3 wall are currently on hold. Delayed determination regarding this PAR will result in further delay in the construction completion of VEGP Unit 3 structures.

A description of the proposed change and the reason for the change are contained in Enclosure 1 to this letter. This PAR has been developed in accordance with guidance provided in the most recent revision to the Interim Staff Guidance on Changes During Construction Under 10 CFR Part 52, COL-ISG-25 [ML15058A377], and corresponds accurately and technically with the above-mentioned LAR-16-024. The technical scope of this PAR is consistent with the technical

scope of the submitted LAR. Section 7 of Enclosure 1 identifies the scope of the "no objection" sought in this PAR.

This letter contains no regulatory commitments. Should you have any questions, please contact Mr. Ryan Henderson at (706) 848-6527.

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/RDH/ljs

Sworn to and subscribed before me this 14th day of September, 2016

Notary Public: Lisa Myrick Spears

My commission expires: June 18, 2019

Enclosures 1) Vogtle Electric Generating Plant (VEGP) Unit 3 – Preliminary Amendment Request Regarding Column Line 7.3 Reinforcement Area Change (PAR-16-024)

cc:

Southern Nuclear Operating Company / Georgia Power Company

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Mr. J. E. Hesler, Bechtel Power Corporation
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Southern Nuclear Operating Company

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Enclosure 1

Vogtle Electric Generating Plant (VEGP) Unit 3

Preliminary Amendment Request

Regarding

Column Line 7.3 Wall Reinforcement Area Change

(PAR-16-024)

(This Enclosure consists of 4 pages, including this cover page)

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Enclosure 1

Preliminary Amendment Request Regarding Column Line 7.3 Wall Reinforcement Area Change (PAR-16-024)

Pursuant to 10 CFR 52.98(c) and in accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC) submitted a license amendment request (LAR) to change the Vogtle Electric Generating Plant (VEGP), Unit 3, Updated Final Safety Analysis Report (UFSAR) associated with Combine License No. NPF-91. Accordingly, SNC requests the determination of whether the NRC has any objection to proceeding with concrete placement for the column line 7.3 wall up to elevation 100'-0", rebar installation and subsequent concrete pour at elevation 100'-0" of floor slabs in Area 2, and rebar/anchor/embed installation and precast panel installation in Room 12259 in the VEGP 3 auxiliary building, as identified in the Preliminary Amendment Request (PAR) provided below, be provided by the date shown below.

PAR Request Number: <u>SNC PAR-16-024</u>	Station Name: VEGP	Unit Number(s): <input checked="" type="checkbox"/> 3 <input type="checkbox"/> 4	PAR Request Date: <u>September 14, 2016</u>
1. NRC PAR Notification Requested Date (see Block 7 for basis): <u>September 21, 2016</u>			
2. License Amendment Request References (as applicable): <input checked="" type="checkbox"/> LAR submittal date and SNC Correspondence Number: <u>September 13, 2016 / ND-16-1610</u> <input type="checkbox"/> Expected LAR submittal date: _____			
3. Brief Description of Proposed Change: <p>The proposed change would revise Tier 2* information in Updated Final Safety Analysis Report (UFSAR) Table 3H.5-5 to revise the provided minimum vertical reinforcement for wall section 11 from elevation 82'-6" to 100'-0" in the VEGP Unit 3 column line 7.3 wall from 3.12 in²/ft to 3.08 in²/ft. A new note, Note 3, is added to UFSAR Table 3H.5-5 which describes the reduction in the minimum provided area of steel in the region adjacent to the shield building for VEGP Unit 3, the acceptability of the change regarding the overall and local performance of the column line 7.3 wall, and the consistency of the provided number of bars with information in UFSAR Figure 3H.5-4.</p>			
4. Reason for License Amendment Request: <p>During the development of construction packages, a need was identified to alter bar placement in the VEGP Unit 3 column line 7.3 wall to avoid interference with a construction joint. The bars were adjusted to the east and additional bars were to be placed west of the construction joint on the east side of the shield building. The relocated bars would be reduced in spacing from #11 bars @ 12" spacing to 9" spacing and the additional bars added would be placed 6" away from that to meet the #11 bars at 6" spacing described on UFSAR Figure 3H.5-4.</p> <p>After placement of concrete up to elevation 82'-6" for the VEGP Unit 3 column line 7.3 wall, surveys were taken of the reinforcement in the wall segment above the elevation 82'-6" concrete placement. After a bar count was completed, it was discovered there was an omitted dowel bar developing from below elevation 82'-6" on the south face of the VEGP Unit 3 column line 7.3 wall. This omission reduced the number of reinforcement bars from 55 bars to 54 bars. The 54 fully developed splice bars within the designed wall length provide 3.08 in²/ft area of steel reinforcement across the shear plane for this wall, short of the minimum provided by the design of 3.12 in²/ft for VEGP Unit 3.</p> <p>UFSAR Table 3H.5-5, and UFSAR Figures 3H.5-2 and 3H.5-4, show that the provided vertical reinforcement for wall section 11 for the wall segment of elevation 82'-6" to elevation 100'-0" is #11 bars at 12" spacing + #11 bars at 12" spacing (equivalent to #11 bars at 6" spacing). Interaction ratio (IR) is a comparison of the required reinforcement over provided reinforcement where a value</p>			

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Enclosure 1

Preliminary Amendment Request Regarding Column Line 7.3 Wall Reinforcement Area Change (PAR-16-024)

less than or equal to one is an acceptable result. The IR for wall section 11 is 0.667 where the required reinforcement per UFSAR Table 3H.5-5 is 2.08 in²/ft and provided reinforcement is 3.12 in²/ft. After the addition of a headed reinforcing bar on the south face, the provided reinforcement is reduced to 3.08 in²/ft along the development length of the bar from elevation 82'-6" on the VEGP Unit 3 column line 7.3 wall. The new IR for this section of wall is 0.675, an increase of only 0.008 in IR.

UFSAR Subsection 3H.5.1.2 states that the auxiliary building design loads are described in UFSAR Subsection 3H.3.3. The column line 7.3 wall is designed for the applicable loads and load combinations and acceptance criteria provided in UFSAR Subsection 3H.3.4. For various segments of the column line 7.3 wall, the results of the corresponding governing load combination and associated design loads shown in UFSAR Table 3H.5-4 are used to calculate the required reinforcement on each face. The wall sections (identified by section number in UFSAR Table 3H.5-5) where the required reinforcement is calculated are shown in UFSAR Figure 3H.5-2 (Sheet 2). Typical wall reinforcement is shown on UFSAR Figure 3H.5-4.

Since conformance is maintained with the applicable codes and standards identified in the underlying Tier 2 information and sufficient margin exists to justify the deviation, the change to the minimum provided reinforcement for the VEGP Unit 3 column line 7.3 wall for elevation 82'-6" to elevation 100'-0" is found to be acceptable.

5. Is Exemption Request Required? Yes No

If Yes, Briefly Describe the Reason for the Exemption.

N/A

6. Identify Applicable Precedents:

None

7. Impact of Change on Installation and Testing Schedules:

SNC's requested date for approval of this license amendment as identified in the referenced LAR is December 15, 2016. The date is based primarily upon the time period required for processing a requested license amendment. The VEGP Unit 3 construction activity related to placing concrete at elevation 92'-6" in room 12259 is currently placed in a "construction hold" status.

As such, this PAR requests a "no objection" finding related to this license amendment by the date identified in Block 1 above (or sooner if reasonably achievable) to allow for appropriate notifications and release of concrete placement activities currently under the "construction" hold" status to allow construction to continue.

Placement of concrete and rebar/embed/anchor installation to elevation 100'-0" at this location can be later removed to restore the wall to its current condition, if required.

Specifically, SNC requests a "no objection" finding to allow concrete placement for the column line 7.3 wall up to elevation 100'-0", rebar installation and subsequent concrete pour at elevation 100'-0" of floor slabs in Area 2, and rebar/anchor/embed installation and precast panel installation in Room 12259 in the VEGP Unit 3 auxiliary building in accordance with the reduced minimum provided reinforcement for the column line 7.3 wall from elevation 82'-6" to elevation 100'-0" proposed in UFSAR Table 3H.5-5 in LAR-16-024.

A "no objection" finding for the above construction activities would allow subsequent dependent construction activities on VEGP Unit 3 to continue.

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Enclosure 1

Preliminary Amendment Request Regarding Column Line 7.3 Wall Reinforcement Area Change
(PAR-16-024)

8. Impact of Change on ITAAC:

No ITAAC are affected by this change, but it will impact the closure of the ITAAC. Final approval of the License Amendment Request will be necessary for closure of the related ITAAC, but a “no objection” finding is requested for this PAR in order to proceed with construction pursuant to the process outlined in COL Condition 2.D(1), Changes during Construction. This PAR should be considered for any inspections related to ITAAC 3.3.00.02.a.i.c (item No. 762) of the VEGP Unit 3 COL Appendix C Table 3.3-6.

9. Additional Information:

None