

## Vogle PEmails

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**From:** Kallan, Paul  
**Sent:** Wednesday, July 05, 2017 1:31 PM  
**To:** Vogle PEmails  
**Subject:** VOG-RAI-LTR-13.docx  
**Attachments:** VOG-RAI-LTR-13.docx

**Hearing Identifier:** Vogtle\_COL\_Docs\_Public  
**Email Number:** 119

**Mail Envelope Properties** (8787ebfc79ed4cc79fd636ff20962a28)

**Subject:** VOG-RAI-LTR-13.docx  
**Sent Date:** 7/5/2017 1:31:21 PM  
**Received Date:** 7/5/2017 1:31:22 PM  
**From:** Kallan, Paul

**Created By:** Paul.Kallan@nrc.gov

**Recipients:**  
"Vogtle PEmails" <Vogtle.PEmails@nrc.gov>  
Tracking Status: None

**Post Office:** HQPWMSMRS08.nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	3	7/5/2017 1:31:22 PM
VOG-RAI-LTR-13.docx	36735	

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

July 5, 2017

Mr. B.H. Whitley, Director  
Regulatory Affairs  
Southern Nuclear Operating Company, Inc.  
42 Inverness Center Parkway, B022  
Birmingham, AL 35242

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 13 RELATED TO  
EMERGENCY PLANNING ITAAC REVISIONS FOR THE VOGTLE ELECTRIC  
GENERATING PLANT UNITS 3 AND 4 COMBINED LICENSES (TAC NO. RP9624)

Dear Mr. Whitley:

By letter dated May 5, 2017 (ADAMS Accession NO. ML17125A331), Southern Nuclear Operating Company (SNC) requested an amendment to Combined License Numbers NPF-91 and NPF-92 for Vogtle Electric Generating Plant Units 3 and 4 respectively. The requested amendment proposes to depart from plant-specific Tier 1 emergency planning ITAAC information and associated COL Appendix C information. The proposed changes do not involve changes to the approved emergency plan or the plant-specific Tier 2 Design Control Document (DCD). Specifically, the requested amendment proposes to revise plant-specific emergency planning inspections, tests, analyses, and acceptance criteria (ITAAC) in Appendix C of the VEGP Units 3 and 4 COLs. Also, proposed changes to COL Appendix C information also include changes to the list of acronyms and abbreviations.

In the course of reviewing your request the NRC staff has identified the need for additional information. The request for additional information (RAI) is enclosed. Please respond to this RAI within 30 days of receipt of this letter.

Also, SNC has requested an issuance date of November 5, 2017, for this LAR. As a result of needing additional information, staff will not be able to complete the review until a minimum of 3 months after receipt of an acceptable supplement to the request.

If you have any questions or comments concerning this matter, you may contact me at 301-415-2809 or [Paul.Kallan@nrc.gov](mailto:Paul.Kallan@nrc.gov).

Sincerely,

*/RA/*

Paul Kallan, Senior Project Manager  
Licensing Branch 4  
Division of New Reactor Licensing  
Office of New Reactors

Docket Nos. 52-025  
52-026

Enclosure:  
Request for Additional Information 13

CC: see next page

If you have any questions or comments concerning this matter, you may contact me at 301-415-2809 or [Paul.Kallan@nrc.gov](mailto:Paul.Kallan@nrc.gov).

Sincerely,

*/RA/*

Paul Kallan, Senior Project Manager  
Licensing Branch 4  
Division of New Reactor Licensing  
Office of New Reactors

Docket Nos. 52-025  
52-026

Enclosure:  
Request for Additional Information 13

CC: see next page

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NAME	JAnderson*	JDixon-Herrity*	PKallan *
DATE	06/27/17	07/05/17	07/05/17

\*Approval captured electronically in the electronic RAI system.

**OFFICIAL RECORD COPY**

## **Request for Additional Information 13**

Issue Date: 07/05/2017

Application Title: VEGP Units 3 and 4 - LARs

Operating Company: Southern Nuclear Operating Co.

Docket No. 52-025 and 52-026

### **Request for Additional Information (RAI) for License Amendment Request (LAR) 17-014 (Emergency Planning ITAAC Revisions)**

13.3-1: Subject: Protective Response

[Basis: 10 CFR 50.47(b)(10), 10 CFR 52.97(b), 10 CFR Part 50 Appendix E, NUREG-0800 Table 14.3.10-1, and NUREG-0654/FEMA-REP-1 Evaluation Criterion J.1]

VEGP Units 3 and 4 EP ITAAC E.3.9.07.01.02 verifies a program commitment to warn and advise onsite individuals of an emergency including those in areas controlled by the operator, including:

1. Employees not having emergency assignments,
2. Visitors,
3. Contractor and construction personnel, and
4. Other persons who may be in the public access areas, on or passing through the site, or within the owner controlled area.

The existing Inspection Tests and Analysis (ITA) criteria associated with VEGP Units 3 and 4 EP ITAAC E.3.9.07.01.02 states, "A test of the onsite warning and communication capability emergency implementing procedures (EIPs) including protective action guidelines, assembly and accountability, and site dismissal will be performed during a drill."

SNC proposed to change the ITA criteria associated with VEGP Units 3 and 4 EP ITAAC E.3.9.07.01.02 to state, "A test will be performed of the capabilities to warn and advise onsite individuals of an emergency, including those in areas controlled by the operator."

The NRC staff has reviewed SNC's Technical Evaluation for the proposed change to the ITA criteria associated with VEGP Units 3 and 4 EP ITAAC E.3.9.07.01.02 and has determined that additional information is needed. Please explain why the revised ITA criteria does not specifically include: 1) Employees not having emergency assignments, 2) Visitors, 3) Contractor and construction personnel, and 4) Other persons who may be in the public access areas, on or passing through the site, or within the owner controlled area, as part of the test so that the revised ITA criteria directly correlates to the existing program commitment and acceptance criteria for ITAAC E.3.9.07.01.02, as well as ensure consistence with the guidance in NUREG-0654/FEMA-REP-1, Evaluation Criterion J.1.