

Vogle PEmails

From: Hoellman, Jordan
Sent: Wednesday, August 02, 2017 4:55 PM
To: Henderson, Ryan Donald
Cc: Chamberlain, Amy Christine (ACCHAMBE@southernco.com); Patel, Chandu
Subject: RAI Transmittal for VEGP Units 3 and 4 LAR 17-017, Containment Air Filtration Exhaust Rooms West Walls Removal
Attachments: RAIs for LAR 17-017 (Containment Air Filtration Exhaust Rooms West Walls Removal).docx

To All:

By letter dated May 24, 2017, Southern Nuclear Company submitted License Amendment Request (LAR) 17-017 to the U. S. Nuclear Regulatory Commission (NRC) for Vogtle Electric Generating Plant Units 3 and 4, Combined License Nos. NPF-91 and NPF-92 (ADAMS Accession No. ML17144A413). The NRC staff is reviewing the request to enable the staff to reach a conclusion on the safety of the proposed changes.

The NRC staff has identified that additional information is needed to continue the review. The staff's request for additional information (RAI) is contained in the attachment to this email. To support the review schedule, you are requested to respond within 30 days of the date of this email. If changes are needed to the final safety analysis report, the staff requests that the RAI response include the proposed wording changes.

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 the change is needed sooner than that date to support construction, please consider submitting a request for approval of a Preliminary Amendment Request (PAR).

If you have any questions or comments concerning this matter, you may contact me at 301-415-5481.

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**Request for Additional Information (RAI) on LAR 17-017,
“Containment Air Filtration Exhaust Rooms West Walls Removal”**

1. 10 CFR 52.47(a)(5) requires applicants to identify the kinds and quantities of radioactive materials expected to be produced in the operation and the means for controlling and limiting radiation exposures.

10 CFR 20.1101(b) requires that licensees use to the extent practical, procedures and engineering controls based upon sound radiation protection principles to achieve occupational doses and doses to members of the public that are as low as is reasonably achievable (ALARA).

10 CFR Part 50, Appendix A, General Design Criterion (GDC) 61, requires in part that systems that may contain radioactivity shall be designed with suitable shielding for radiation protection.

In LAR 17-017, the licensee proposes to remove labyrinth shield walls on the west side of the containment air filtration exhaust rooms A and B in the Annex building. The licensee indicates in the LAR that the removal of the walls is necessary to allow skid mounted maintenance equipment to navigate through the area. In addition, the licensee indicates that the removal of the walls is consistent with the requirement to maintain doses ALARA because if the walls were retained custom built equipment would be required or workers would be required to disassemble the equipment to get it inside and outside of the rooms. These options would increase cost or dose. However, the LAR does not discuss the option of using removable or temporary shielding in place of the permanent shield walls. Regulatory Guide (RG) 8.8 specifies that shielding that can be quickly removed and reinstalled can be used as part of the effort to maintain occupational radiation exposures ALARA.

Therefore, consistent with RG 8.8, the staff requests that the applicant provide additional information regarding if removable or temporary shielding is being considered in place of the permanent shield walls that are requested to be removed. If removable or temporary shielding is not going to be used, please discuss why it is not necessary. Update the UFSAR to include removable or temporary shielding or describe why it was not needed.

2. 10 CFR, Part 50, Appendix A, GDC 4, requires that structures, systems, and components important to safety be designed to accommodate the effects of and to be compatible with the environmental conditions associated with normal operation, maintenance, testing, and postulated accidents, including loss-of-coolant accidents. These structures, systems, and components shall be appropriately protected against dynamic effects, including the effects of missiles, pipe whipping, and discharging fluids, that may result from equipment failures and from events and conditions outside the nuclear power units.

10 CFR, Part 50, Appendix A, GDC 2, "Design bases for protection against natural phenomena," requires in part that SSCs shall be designed to withstand the effects of natural phenomena without loss of capability to perform their safety functions and shall reflect, in part, the importance of the safety functions to be performed.

Consistent with Standard Review Plan Section 3.8.4, the staff reviews the descriptive information, including plans and sections of each structure, to establish that there is sufficient information to define the primary structural aspects and elements relied upon for the structure to perform the intended safety function.

Staff reviewed License Amendment Request (LAR) 17-017, submitted by Southern Nuclear Operating Company (SNC). As a result of this review the staff identified the need, for the following additional information.

LAR 17-017, Enclosure 1, Page 8 of 13, first sentence, states: "Structural design and layout are not adversely impacted as the removed walls were not previously considered in structural design calculations".

Please qualify the above statement from the LAR with responses to the questions below:

- a) Do the walls proposed to be removed provide structural support for the adjacent East-West walls in each location?
- b) Describe the actions that were taken for the removal of walls that are shown in the Updated Final Safety Analysis Report (UFSAR) Figures (Enclosure 4) but not considered in the actual design calculation.
- c) Provide the demand and capacity for the East-West wall with the change proposed in the LAR.