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Docket Nos.: 52-025
52-026

ND-17-1246
10 CFR 50.90
10 CFR 52.63

U.S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4
Supplement to Request for License Amendment and Exemption:
Emergency Planning ITAAC Revisions (LAR-17-014S1)

Ladies and Gentlemen:

Pursuant to 10 CFR 52.98(c), and in accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC) requested an amendment to the combined licenses (COLs) for Vogtle Electric Generating Plant (VEGP) Units 3 and 4 (License Numbers NPF-91 and NPF-92, respectively) by SNC letter ND-17-0454, dated May 5, 2017 [ADAMS Accession Number ML17125A331]. The requested amendment proposed changes to plant-specific emergency planning inspections, tests, analyses, and acceptance criteria (ITAAC) in Appendix C of the VEGP Units 3 and 4 COLs. The amendment also proposed changes to plant-specific Tier 1 emergency planning ITAAC information and associated COL Appendix C information. Pursuant to the provisions of 10 CFR 52.63(b)(1), an exemption from elements of the design as certified in the 10 CFR Part 52, Appendix D, design certification rule was also requested for the plant-specific Design Control Document (DCD) Tier 1 material departures.

During the NRC review of the license amendment request and exemption request, in a letter dated July 5, 2017 [ADAMS Accession Number ML17186A302], the NRC determined a need for additional information regarding an EP ITAAC associated with protective response. The SNC response is provided in Enclosure 6 of this letter, which supplements the original LAR-17-014. Revised markups of proposed changes to VEGP Units 3 and 4 licensing basis documents are provided in Enclosures 7 and 8, respectively.

The supplemental information provided in this LAR supplement does not impact the scope, technical content, or conclusions of the Technical Evaluation, Significant Hazards Consideration Determination, or Environmental Considerations of the original LAR provided in Enclosure 1 of SNC letter ND-17-0454.

This letter contains no regulatory commitments. This letter has been reviewed and confirmed to not contain security-related information.

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 enclosures to the designated State Official.

Should you have any questions, please contact Ryan Henderson at (205) 992-6426.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 3rd of August 2017.

Respectfully submitted,



Brian H. Whitley
Director, Regulatory Affairs
Southern Nuclear Operating Company

- Enclosures: 1 – 5) (Previously submitted with the original LAR, LAR-17-014, in SNC letter ND-17-0454)
- 6) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Response to NRC Question Regarding Emergency Planning ITAAC Related to Protective Response (LAR-17-014S1)
 - 7) Vogtle Electric Generating Plant (VEGP) Unit 3 – Revised Markups of Proposed Changes to VEGP Unit 3 Licensing Basis Documents (LAR-17-014S1)
 - 8) Vogtle Electric Generating Plant (VEGP) Units 4 – Revised Markups of Proposed Changes to VEGP Unit 4 Licensing Basis Documents (LAR-17-014S1)

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Enclosure 6

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

**Response to NRC Question Regarding Emergency Planning ITAAC Related to Protective
Response**

(LAR-17-014S1)

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

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Enclosure 6

Response to NRC Question Regarding Emergency Planning ITAAC Related to Protective Response (LAR-17-014S1)

Pursuant to 10 CFR 52.98(c), and in accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC) requested an amendment to the combined licenses (COLs) for Vogtle Electric Generating Plant (VEGP) Units 3 and 4 (License Numbers NPF-91 and NPF-92, respectively) by SNC letter ND-17-0454, dated May 5, 2017 [ADAMS Accession Number ML17125A331]. The requested amendment proposed changes to plant-specific emergency planning inspections, tests, analyses, and acceptance criteria (ITAAC) in Appendix C of the VEGP Units 3 and 4 COLs. The amendment also proposed changes to plant-specific Tier 1 emergency planning ITAAC information and associated COL Appendix C information. Pursuant to the provisions of 10 CFR 52.63(b)(1), an exemption from elements of the design as certified in the 10 CFR Part 52, Appendix D, design certification rule was also requested for the plant-specific Design Control Document (DCD) Tier 1 material departures.

During the NRC review of the license amendment request and exemption request, in a letter dated July 5, 2017 [ADAMS Accession Number ML17186A302], the NRC determined a need for additional information regarding an EP ITAAC associated with protective response. The SNC response is provided below and supplements the original LAR-17-014.

NRC Question 13.3-1:

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.

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Enclosure 6

Response to NRC Question Regarding Emergency Planning ITAAC Related to Protective Response (LAR-17-014S1)

SNC Response to NRC Question 13.3-1:

SNC intended that the clause in the ITA “including those in the areas controlled by the operator,” is inclusive of the detail specified in the program commitment and the acceptance criteria. To clarify the intent of the ITA, SNC proposes to add detail to the ITA which includes non-essential personnel; visitors; contractor and construction personnel, and other personnel within the owner controlled area. The added detail is consistent with the approved acceptance criteria.

A proposed change to the detailed description which clarifies which personnel are included in the scope of the ITA is shown below:

Enclosure 1, page 35 of 63, VEGP 3 and 4 EP ITAAC E.3.9.07.01.02:

The fourth paragraph is revised from:

Therefore, it is proposed to change the ITA to read, “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.”

To read:

Therefore, it is proposed to change the ITA to read, “A test will be performed of the capabilities to warn and advise onsite individuals of an emergency, including non-essential personnel; visitors; contractor and construction personnel; and other personnel within the owner controlled area.”

Proposed changes to Unit 3 EP ITAAC E.3.9.07.01.02, reference number 866, and Unit 4 EP ITAAC E.3.9.07.01.02, reference number 866, are shown in Enclosures 7 and 8, respectively.

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Enclosure 7

Vogtle Electric Generating Plant (VEGP) Unit 3

Revised Markups of Proposed Changes to VEGP Unit 3 Licensing Basis Documents

(LAR-17-014S1)

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

Replace Enclosure 3, page 14 of 27, with the following:

**Revise Unit 3 COL Appendix C, Page C-464
 EP ITAAC E.3.9.07.01.02 (866) and
 EP ITAAC E.3.9.07.01.03 (867)**

Table E.3.9-7 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Program Commitment	Inspections, Tests, Analyses	Acceptance Criteria
866	E.3.9.07.01.02	<p>7.1 The means exists to warn and advise onsite individuals of an emergency, including those in areas controlled by the operator, including:</p> <ul style="list-style-type: none"> • Employees not having emergency assignments • Visitors • Contractor and construction personnel • Other persons who may be in the public access areas, on or passing through the site, or within the owner controlled area <p>[J.1]</p>	<p>7.1 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. <u>A test will be performed of the capabilities to warn and advise onsite individuals of an emergency, including non-essential personnel; visitors; contractor and construction personnel; and other personnel within the owner controlled area.</u></p>	<p>7.1.2 Demonstrate the ability to notify and advise onsite personnel including:</p> <ol style="list-style-type: none"> 1. Non-essential personnel; 2. Visitors; 3. Contractor and construction personnel; and 4. Other personnel within the owner controlled area.
867	E.3.9.07.01.03 <u>Not used.</u>	<p>7.1 The means exists to warn and advise onsite individuals of an emergency, including those in areas controlled by the operator, including:</p> <ul style="list-style-type: none"> • Employees not having emergency assignments • Visitors • Contractor and construction personnel • Other persons who may be in the public access areas, on or passing through the site, or within the owner controlled area <p>[J.1]</p>	<p>7.1 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.</p>	<p>7.1.3 Demonstrate the ability to prepare for around the clock staffing requirements.</p>
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Southern Nuclear Operating Company

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Enclosure 8

Vogtle Electric Generating Plant (VEGP) Unit 4

Revised Markups of Proposed Changes to VEGP Unit 4 Licensing Basis Documents

(LAR-17-014S1)

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

Replace Enclosure 4, page 13 of 24, with the following:

**Revise Unit 4 COL Appendix C, Page C-463
 EP ITAAC E.3.9.07.01.01 (865) and EP ITAAC E.3.9.07.01.02 (866)**

Table E.3.9-7 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Program Commitment	Inspections, Tests, Analyses	Acceptance Criteria
865	E.3.9.07.01.01 <u>Not used.</u>	7.1 The means exists to warn and advise onsite individuals of an emergency, including those in areas controlled by the operator, including: <ul style="list-style-type: none"> • Employees not having emergency assignments • Visitors • Contractor and construction personnel • Other persons who may be in the public access areas, on or passing through the site, or within the owner controlled area [J.1]	7.1 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.	7.1.1 Demonstrate the capability to direct and control emergency operations.
866	E.3.9.07.01.02	7.1 The means exists to warn and advise onsite individuals of an emergency, including those in areas controlled by the operator, including: <ul style="list-style-type: none"> • Employees not having emergency assignments • Visitors • Contractor and construction personnel • Other persons who may be in the public access areas, on or passing through the site, or within the owner controlled area [J.1]	7.1 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. <u>A test will be performed of the capabilities to warn and advise onsite individuals of an emergency, including non-essential personnel; visitors; contractor and construction personnel; and other personnel within the owner controlled area.</u>	7.1.2 Demonstrate the ability to notify and advise onsite personnel, including: <ol style="list-style-type: none"> 1) Non-essential personnel; 2) Visitors 3) Contractor and construction personnel; and 4) Other personnel within the owner controlled area.