

SAFETY EVALUATION BY THE OFFICE OF NEW REACTORS
RELATED TO AMENDMENT NOS. 87 AND 86
TO THE COMBINED LICENSE NOS. NPF-91 AND NPF-92, RESPECTIVELY
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 February 24, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17055C352), as supplemented by letter dated August 7, 2017 (ADAMS Accession No. ML17219A185), Southern Nuclear Operating Company (SNC or licensee) submitted license amendment request (LAR) 17-004 requesting the U.S. Nuclear Regulatory Commission (NRC or the Commission) approval for amendments the combined licenses (COLs) for Vogtle Electric Generating Plant (VEGP) Units 3 and 4, COL Numbers NPF-91 and NPF-92, respectively, regarding the changes to standardize the instrumentation setpoint nomenclature for the protection and safety monitoring system (PMS). SNC also requested related exemptions from the Commission's regulations.

The requested amendments requires changes to the Updated Final Safety Analysis Report (UFSAR) in the form of departures from the Plant-Specific Design Control Document (DCD) Tier 2 information and involves changes to plant-specific standardization of the PMS instrumentation setpoint nomenclature. Additionally, this request involves changes to the VEGP Units 3 and 4 COL Appendix A, Technical Specifications (TS). There is no change to instrumentation setpoint values, alarms and actuations for the PMS proposed in these LAR. Because the proposed changes impact Tier 1 of the Plant-Specific DCD, Appendix C of the COL, and the TS, SNC determined that this activity required prior NRC approval. In a letter dated August 7, 2017, the licensee submitted a supplement to correct an inconsistency in the

LAR between the number of PMS post-accident parameter displays described in the background of the LAR and that provided by the plant design.

Pursuant to the provisions of 10 CFR 52.63(b)(1), the licensee has also requested a permanent exemption from the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52, Appendix D, "Design Certification Rule for the AP1000 Design," Section III.B, "Scope and Contents." This exemption request will allow a departure from elements of the certified information in Tier 1 of the generic AP1000 DCD.¹

The specific changes to Tier 1 information for which a plant-specific departure and exemption is requested include standardizing the instrumentation setpoint nomenclature for the PMS. In order to grant the licensee's request to modify the UFSAR (the plant-specific DCD) Tier 1 information, the NRC must be able to determine that the exemption will comply with the requirements of § 52.7. In addition to the factors listed in § 52.7, the Commission shall consider whether the special circumstances that § 52.7 requires to be present outweigh any decrease in safety that may result from the reduction in standardization caused by the exemption. The NRC staff's review of the exemption request, as well as this LAR, is included in this safety evaluation (SE).

On April 25, 2017, the NRC staff published a proposed no significant hazards consideration determination in the *Federal Register* (82 FR 19104) for the proposed amendment. The August 7, 2017, supplement provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the NRC staff's original proposed no significant hazards consideration determination.

2.0 REGULATORY EVALUATION

The PMS is a digital Instrumentation and Control (I&C) system, which detects off-normal conditions and actuates the appropriate safety-related functions necessary to achieve and maintain the plant in a safe shutdown condition. The PMS controls safety-related components in the plant that are operated from the main control room (MCR) or remote shutdown workstation. In addition, the PMS provides the equipment necessary to monitor the plant safety-related functions during and following an accident. The two qualified data processing system (QDPS) Divisions B and C provide data to support the four safety-related displays of selected parameters in the MCR. Plant data obtained from sensors and other PMS divisions is processed by Divisions B and C of QDPS and provided to the four safety displays, which provide the visual interface to the operators in the MCR.

This LAR proposed changes to revise the COLs concerning standardization of the instrumentation setpoint nomenclature used for the PMS. However, there is no change to instrumentation setpoint values, alarms, and actuations for the PMS proposed in this LAR.

The changes proposed in this LAR include the following:

1. Reactor Coolant Pump Bearing Water Temperature "High" changed to "High-2";

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.

2. Pressurizer Pressure:
 - a. "Low" changed to "Low-2" for the Reactor Trip System (RTS) trip; and
 - b. "Low" changed to "Low-3" for the Engineered Safety Features Actuation System (ESFAS) trip;
3. Pressurizer Pressure "High" changed to "High-2";
4. Pressurizer Water Level:
 - a. "High" changed to "High-3" for the RTS trip; and
 - b. "High" changed to "High-2" or "High-3" for ESFAS trip functions;
5. Reactor Coolant Flow "Low" changed to "Low-2";
6. Reactor Coolant Pump Speed "Low" changed to "Low-2";
7. Steam Generator Water Level:
 - a. "High" and/or "High-2" changed to "High-3";
 - b. "High" changed to clarify two separate trips -- "High-3" and "Reactor trip plus High Steam Generator Level"; and
 - c. One occurrence of "High-2" corrected to "High";
8. Core Makeup Tank (CMT) Water Level:
 - a. "Low-1" (or "Low") changed to "Low-3" and
 - b. "Low-2" (or "Low-Low") changed to "Low-6";
9. Steam Line Pressure "Low" changed to "Low-2";
10. Reactor Coolant System (RCS) Hot Leg Level:
 - a. "Low-1" (or "Low") changed to "Low-2" and
 - b. "Low-2" (or "Low") changed to "Low-4";
11. RCS Cold Leg Temperature (T_{cold}) "Low" changed to "Low-2"; and
12. Startup Feedwater Flow "Low" changed to "Low-2";
13. General Consistency changes:
 - a. TS (TS) – "Low-1" and "High-1" changed to "Low" and "High"; and
 - b. Subsection 15.5.1.2 – "high-3 pressurizer signal" changed to "High-3 pressurizer water level signal."

The proposed changes to standardize the PMS instrumentation nomenclature follows the scheme shown in Figure 1 below. In this setpoint nomenclature scheme, lower and higher setpoint values are designated with a higher degree of "lowness" and "highness," and only one setpoint designator is used per setpoint.

Figure 1: Setpoint Nomenclature Scheme

<u>Low Setpoints</u>	<u>High Setpoints</u>
Low / Low-1*	High / High-1*
Low-2	High-2
Low-3	High-3
[etc.]	[etc.]

* Low and Low-1 are considered to be equivalent terms when referring to the first low setpoint designator. High and High-1 are considered to be equivalent terms when referring to the first high setpoint designator.

According to the above general change scheme and general changes, this LAR proposes specific changes to the UFSAR in the form of departures from the plant-specific DCD Tier 2 information, and involves changes to related plant-specific DCD Tier 1 and TS information, with corresponding changes to the associated COL Appendix C information.

10 CFR 52.98(f) requires NRC approval for any modification to, addition to, or deletion from the terms and conditions of a COL.

10 CFR Part 52, Appendix D, Section VIII.A.4, states that exemptions from Tier 1 information are governed by 10 CFR 52.63(b)(1) and 52.98(f). It also states that 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.

10 CFR Part 52, Appendix D, Section VIII.B.5.a allows an applicant or licensee who references this appendix to depart from Tier 2 information, without prior NRC approval, unless the proposed departure involves a change to or departure from Tier 1 information, Tier 2* information, or the TS or requires a license amendment under paragraphs B.5.b or B.5.c of the section.

10 CFR Part 52, Appendix D, Section VIII.C.6 states that after issuance of a license, "Changes to the plant-specific TS will be treated as license amendments under 10 CFR 50.90." 10 CFR 50.90 addresses the application for amendment of license, construction permit, or early site permit.

10 CFR 52.63(b)(1) allows the licensee who references a design certification rule 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 determines that the exemption will comply 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 the special circumstances present outweigh any decrease in safety that may result from the reduction in standardization caused by the exemption. 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 50.36, "Technical specifications," impose limits, operating conditions, and other requirements upon reactor facility operation for the public health and safety. The TS are derived from the analyses and evaluations in the safety analysis report. TS must contain: (1) safety limits and limiting safety system settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls.

3.0 TECHNICAL EVALUATION

3.1 EVALUATION OF EXEMPTION

The Tier 1 information for which a plant-specific departure and exemption was requested includes corresponding changes to COL Appendix C information. The result of this exemption would be that the licensee could implement modifications to Tier 1 information described and justified in LAR-17-004 if, and only if, the NRC approves LAR-17-004. This exemption 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, Section VIII.A.4 of Appendix D to 10 CFR Part 52 provides that the Commission will deny a request for an exemption from Tier 1 if it finds that the requested changes 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 grant exemptions from one or more elements of the certified information, so long as the criteria given in 10 CFR 52.7, which, in turn, references 10 CFR 50.12, are met and that the special circumstances, which are defined by 10 CFR 50.12(a)(2), 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. As 10 CFR 52.7 further states, the Commission's consideration will be governed by 10 CFR 50.12, "Specific exemptions," which states that an exemption may be granted when: (1) the exemptions are authorized by law; (2) will not present an undue risk to the public health and safety; (3) are consistent with the common defense and security; (4) special circumstances are present; (5) special circumstances outweigh reduced standardization; and (6) there is no significant reduction in safety. Specifically, 10 CFR 50.12(a)(2) lists six special circumstances for which an exemption may be considered. It is necessary for one of these special circumstances to be present in order for the NRC to consider granting an exemption request. The licensee stated in this LAR that the requested exemption meets the special circumstances of 10 CFR 50.12(a)(2)(ii). That subparagraph defines special circumstances as when "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 NRC staff's analysis and evaluation of each of these conditions for an exemption are presented below.

3.1.1 AUTHORIZED BY LAW

This exemption would allow the licensee to implement a revision to Tier 1 information in the plant-specific DCD, specifically changes to instrumentation setpoint nomenclature used in Tier 1 Tables 2.5.2-2 and 2.5.2-6. This exemption is a permanent exemption limited in scope to particular Tier 1 information. Subsequent changes to Tier 1 information would be subject to the exemption process specified in Section VIII.A.4 of Appendix D to 10 CFR Part 52 and the requirements of 10 CFR 52.63(b)(1). 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. Based on 10 CFR Part 52, Appendix D, Section VIII.A.4, the NRC staff has determined that granting of 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 NRC staff finds that 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 a licensee will construct and operate the plant based on the approved information found in the DCD incorporated by reference into a licensee's licensing basis. The exemption proposed in this LAR from the requirements of 10 CFR 52, Appendix D, Section III.B would allow changes to elements of the plant-specific Tier 1 DCD to depart from the certified AP1000 Tier 1 design information. The plant-specific DCD Tier 1 will continue to reflect the approved licensing basis for VEGP Units 3 and 4, and will maintain a consistent level of detail with that which is currently provided elsewhere in Tier 1 of the DCD. Therefore, the NRC staff finds that the affected plant-specific DCD Tier 1 information will continue to serve its required purpose. The proposed

standardization of the instrumentation setpoint nomenclature for the PMS does not present any adverse impact to the design function of the PMS or the equipment or components therein and will continue to protect the health and safety of the public in the same manner. The above changes proposed do not introduce any new industrial, chemical, or radiological hazards that would present a public health or safety risk, nor does it 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 fuel cladding failures. Accordingly, the proposed changes do not present an undue risk from any existing or proposed equipment or systems. Therefore, as required by 10 CFR 50.12(a)(1), the granting of the exemptions will not present undue risk to the public health and safety.

3.1.3 CONSISTENT WITH COMMON DEFENSE AND SECURITY

The proposed exemption from the requirements of 10 CFR 52, Appendix D, Section III.B would allow the licensee to depart from elements of the plant-specific DCD Tier 1 information. The proposed exemption does not alter or impede the design, function, or operation of any plant structures, systems, or components 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. The requested exemption has no impact on plant security or safeguards procedures. Therefore, as required by 10 CFR 50.12(a)(1), the NRC staff finds that the exemption is consistent with the common defense and security.

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 purpose of the Tier 1 information is to ensure that a licensee will safely construct and operate a plant based on the certified information found in the AP1000 DCD, which was incorporated by reference into the VEGP Units 3 and 4 licensing bases. The proposed changes would standardize the instrumentation setpoint nomenclature used for the PMS. These changes will enable the licensee to safely construct and operate the AP1000 facility using standardized instrumentation setpoint nomenclature found in Tier 1, TS, and Tier 2 of the DCD.

Special circumstances are present in the particular circumstances discussed in LAR-17-004 because the application of the specified Tier 1 information does not serve the underlying purpose of the rule. This LAR proposes to implement changes to plant specific Tier 1 (and associated COL Appendix C) and TS information. The NRC staff finds that the Tier 1 changes in this exemption request, and associated TS and Tier 2 changes, standardize the instrumentation setpoint nomenclature used for the safety-related PMS, so the use of the setpoint nomenclature will be consistent to avoid any confusion. These changes will enable the licensee to safely construct and operate the AP1000 facility using standardized instrumentation setpoint nomenclature found in Tier 1, TS, and Tier 2 of the DCD. Therefore, the NRC 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

Under 52.63(b)(1), “[i]n addition to the factors listed in § 52.7, the Commission shall consider whether the special circumstances that § 52.7 requires to be present outweigh any decrease in safety that may result from the reduction in standardization caused by the exemption.” This exemption would allow the changes proposed in this LAR to standardize the instrumentation setpoint nomenclature for the safety-related PMS, so the use of the setpoint nomenclature will be consistent to avoid any confusion. The proposed changes in this LAR do not affect any function or feature used for the prevention and mitigation of accidents or their safety analyses. The proposed changes do not involve nor interface with any SSC accident initiator or initiating sequence of events related to the accidents evaluated, and therefore do not have an adverse effect on any SSC’s design function. Accordingly, this exemption from the certification information will enable the licensee to safely construct and operate the AP1000 facility consistent with the design certified by the NRC in 10 CFR Part 52, Appendix D. Consequently, any decrease in safety impact that may result from any reduction in standardization caused by the exemption is minimized, because the proposed design changes only involve nomenclature. Based on the foregoing reasons, as required by 10 CFR Part 52.63(b)(1), the NRC staff finds that the special circumstances outweigh the effects that the departure has on the standardization of the AP1000 design.

3.1.6 NO SIGNIFICANT REDUCTION IN SAFETY

This exemption would allow standardizing the instrumentation setpoint nomenclature used for the safety-related PMS. There are no changes to the setpoint values, alarms, and actuations for the PMS. The proposed changes will not have any adverse effect on the safety functions of the PMS. Therefore, based on the foregoing reasons and as required by 10 CFR Part 52, Appendix D, Section VIII.A.4, the NRC 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 TECHNICAL EVALUATION OF PROPOSED CHANGES

As shown in Section 2.0 of this SE, the change scheme and all its related changes proposed in this LAR are intended to standardize the instrumentation setpoint nomenclature used for the PMS. The NRC staff noticed that the licensee states in the initial submittal of Enclosure 1 in this LAR that, “It has four divisions of reactor trip and ESFAS actuation, and two divisions of safety-related post-accident parameter displays.” The statement of, “two divisions of safety-related post-accident parameter displays,” is not correct because there are four divisions of safety-related post-accident parameter displays for the VEGP Units 3 and 4 plant design. On August 7, 2017, the licensee submitted supplemental information to correct this error.

3.2.1 EVALUATION OF INSTRUMENTATION AND CONTROL CHANGES

The NRC staff identified that some changes proposed in this LAR are made to consistently refer to a given setpoint with the same designator throughout the licensing bases. In other cases, changes are proposed to standardize the setpoint designator format. The NRC staff reviewed the proposed setpoint nomenclature to verify that (1) no setpoints on any instrument or control was being changed, and (2) that the nomenclature changes were applied consistently throughout the plant-specific DCD and TS. All proposed licensing basis changes for COL Appendix A, COL Appendix C (and corresponding plant-specific Tier 1 information), and the related Tier 2 changes do not result in changes to any setpoint values. Those changes are

made to provide clarity to the licensing bases. Therefore, it is clear which setpoint designator is used for a given PMS engineered safety feature actuation or reactor trip function.

In addition, the NRC staff identified that some other changes proposed are made to avoid using a single setpoint designator for more than one setpoint value. For the change to the setpoint designator in this LAR, the NRC staff reviewed the proposed setpoint nomenclature changes to verify that there is no change to the actual PMS setpoints for trip, alarm, and actuation functions, and the setpoint values assumed in the safety analysis remain the same. The proposed changes do not affect any function or feature used for the prevention and mitigation of accidents or their safety analyses. Except for the instrumentation nomenclature changes proposed for the PMS, no change to safety-related structure, system, component (SSC) or function is proposed in this LAR. Therefore, the NRC staff finds that the changes to standardize the instrumentation setpoint nomenclature for the PMS acceptable.

3.2.2 EVALUATION OF TECHNICAL SPECIFICATION CHANGES

The PMS RTS and ESFAS setpoint designators referenced within the UFSAR, COL Appendix A, and COL Appendix C, and the corresponding plant-specific Tier 1 are proposed to be updated, as necessary, to reflect this nomenclature scheme. The proposed updates include:

Changes in nomenclature format. For example, “low-low” to “Low-2,” “Hi-2” to “High-2,” and “underspeed” to “Low-2 speed”.

Changes in high and low setpoint designator levels. For example, “Low” to “Low-3” and “High-2” to “High-3.” In some instances these changes are made for internal consistency within the licensing basis. In other instances, the setpoint designator is renamed so that any single setpoint designator is only used for a single setpoint value.

A new note for UFSAR Table 7.3-1 to explicitly state that “Low” and “Low-1,” and “High” and “High-1,” are equivalent designators. For consistency, the TS are proposed to change each “Low 1” and “High 1” reference to “Low” and “High,” respectively.

COL Appendix A TS are proposed to be revised as follows:

1. Revisions to TS Table 3.3.1-1 are:
 - Function 8 - Reactor Coolant Pump Bearing Water Temperature:
 - “High” changed to “High-2”
 - Function 5a - Pressurizer Pressure:
 - “Low” changed to “Low-2” for the RTS trip
 - “Low” changed to “Low-3” for the ESFAS trip
 - Function 5b - Pressurizer Pressure:
 - “High” changed to “High-2”
 - Function 7 - Reactor Coolant Flow:
 - “Low” changed to “Low-2”
 - Function 9 - Reactor Coolant Pump Speed:
 - “Low” changed to “Low-2”
 - Function 11 - Steam Generator Water Level:
 - a. “High” and/or “High-2” changed to “High-3”
 - b. “High” changed to clarify two separate trips:

- (i) "High-3" and (ii) "Reactor Trip plus High Steam Generator Level"
 - c. One occurrence of "High-2" corrected to "High"
- Functions 3, 6, 8, & 12 - "Low 1" and "High 1" Function names changed to "Low" and "High," respectively
2. Revisions to TS Table 3.3.8-1 are:
- Function 19 - Reactor Coolant Pump Bearing Water Temperature:
 - "High" changed to "High-2"
 - Function 5 - Pressurizer Pressure:
 - "Low" changed to "Low-2" for the RTS trip
 - "Low" changed to "Low-3" for the ESFAS trip
 - Function 23 - Steam Generator Water Level:
 - a. "High" and/or "High-2" changed to "High-3"
 - b. "High" changed to clarify two separate trips:
 - (i) "High-3" and (ii) "Reactor Trip plus High Steam Generator Level"
 - c. One occurrence of "High-2" corrected to "High"
 - Function 15 & 16 - CMT Water Level:
 - a. "Low-1" (or "Low") changed to "Low-3"
 - b. "Low-2" (or "Low-Low") changed to "Low-6"
 - Function 24 - Steam Line Pressure:
 - "Low" changed to "Low-2"
 - Function 11 - RCS Cold Leg Temperature (Tcold and Reactor Coolant Inlet Temperature): "Low" changed to "Low-2"
3. Revisions to TS Table 3.3.10-1 are:
- Functions 1 & 2 - RCS Hot Leg Water Level:
 - a. "Low-1" (or "Low") changed to "Low-2"
 - b. "Low-2" (or "Low" or "Low-Low") changed to "Low-4"
4. Revisions to LCO 3.3.11 is: Low Startup Feedwater Flow: "Low" changed to "Low-2"

The above TS changes to function names in TS 3.3 are made to consistently refer to a given setpoint with the same designator throughout the licensing basis, and to avoid using a single setpoint designator for more than one setpoint value in order to reduce human related errors. No setpoint values or PMS alarms and actuations are changed by this activity. The TS changes do not affect any function or feature used for the prevention and mitigation of accidents or their safety analyses, and do not adversely affect any allowable value or design analysis. The TS changes are consistent with other changes proposed to the UFSAR. The bases provided the summary or reason for the amended TS. The staff therefore finds the TS changes acceptable.

3.3 SUMMARY OF TECHNICAL EVALUATION

In LAR-17-004, the licensee proposed to standardize the instrumentation setpoint nomenclature for the safety-related PMS that would affect the COL Appendix C, the corresponding plant-

specific Tier 1, TS information, as well as the UFSAR. The changes were reviewed in Section 3.2 above of this SE. The changes proposed in this LAR include standardizing instrumentation setpoint nomenclature used for the PMS.

The NRC staff reviewed the above changes in Section 3.2 of this SE. In summary, the NRC staff finds that there are no changes to setpoint values, alarms, and actuations for the PMS proposed in this LAR, and hence, the safety functions of the safety-related PMS will not be impacted adversely by the proposed changes in this LAR. In addition, the staff finds that the changes do not affect any function or feature used for the prevention and mitigation of accidents or their safety analyses, do not adversely affect any allowable value or design analysis. Subsequently, there is no significant increase in individual or cumulative occupational radiation exposure. Therefore, the NRC staff finds that the changes to standardize the instrumentation setpoint nomenclature for the PMS proposed in this LAR are acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations in 10 CFR 50.91(b)(2), 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, "Standards for Protection Against Radiation." The 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. Also, 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 (*Federal Register*, 82 FR 19104, dated April 25, 2017). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Under 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 this LAR, and because the exemption does not authorize any activities other than those proposed in this LAR, 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), the NRC staff finds that no environmental impact statement nor 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 proposed in this LAR (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) presents special circumstances; (5) the special circumstances outweigh the potential decrease in safety due to reduced standardization; and (6) does not reduce the level of safety at the licensee's facility. Therefore, the NRC staff grants the licensee an exemptions from the Tier 1 information requested by the licensee.

The staff has also concluded, based on the technical evaluation presented in Section 3.2 above and confirmed that the changes to standardize the instrumentation setpoint nomenclature for the safety-related PMS do not change any analysis methodology, assumptions, or the design itself, and that there is reasonable assurance that: (1) the health and safety of the public will not be endangered by construction and 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 NRC staff finds the changes proposed in this LAR are acceptable.

7.0 REFERENCES

1. Request for License Amendment and Exemption – Standardization of Instrumentation Setpoint Nomenclature (LAR-17-004) letter from Southern Nuclear Operating Company dated February 24, 2017 (ADAMS Accession No. ML17055C352).
2. Supplement to Request for License Amendment and Exemption – Standardization of Instrumentation Setpoint Nomenclature (LAR-17-004S1) letter from Southern Nuclear Operating Company dated August 7, 2017 (ADAMS Accession No. ML17219A185).
3. VEGP Units 3 and 4 Updated Final Safety Analysis Report (UFSAR), Revision 6, dated March 12, 2017 (ADAMS Accession No. ML17172A218).
4. AP1000 Design Control Document, Revision 19, dated June 13, 2011 (ADAMS Accession No. ML11171A500).
5. Combined License NPF-91 for Vogtle Electric Generating Plant Unit 3, Southern Nuclear Operating Company (ADAMS Accession No. ML14100A106).
6. Combined License NPF-92 for Vogtle Electric Generating Plant Unit 4, Southern Nuclear Operating Company (ADAMS Accession No. ML14100A135).