



December 15, 2017

Docket Nos.: 52-025 ND-17-1975 52-026 10 CFR 50.90

10 CFR 52.98

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

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4
Supplement to Request for License Amendment Regarding:
Increase in MSIV Compartment Pressure (LAR-17-028S1)

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, LAR-17-028, to the combined licenses (COLs) for Vogtle Electric Generating Plant (VEGP) Units 3 and 4 (License Numbers NPF-91 and NPF-92, respectively). The requested amendment proposes to depart from approved AP1000 Design Control Document (DCD) Tier 2 information (text) and involved Tier 2* information (as incorporated into the Updated Final Safety Analysis Report (UFSAR) as plant-specific DCD information).

The requested amendment proposes increasing the design pressure of the main steam isolation valve (MSIV) compartments from 6.0 psi to 6.5 psi and proposes other changes to the licensing basis regarding descriptions of the MSIV compartments.

Enclosures 1 and 2 of SNC letter ND-17-1417 [ML17230A365] were provided with the original LAR-17-028.

Enclosure 3 provides the non-proprietary responses to NRC Staff request for additional information (RAI) dated November 1, 2017 [ML17305B331].

Enclosure 4 provides the proprietary responses to NRC Staff request for additional information (RAI) dated November 1, 2017 [ML17305B331].

Enclosure 5 provides the SNC affidavit for withholding proprietary information contained in Enclosure 4.

Enclosure 6 provides the Westinghouse affidavit for withholding proprietary information contained in Enclosure 4.

U.S. Nuclear Regulatory Commission ND-17-1975 Page 2 of 5

Enclosure 7 identifies a revision to the original LAR-17-028.

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, LAR-17-028, provided in Enclosure 1 of SNC letter ND-17-1417.

SNC maintains the requested staff approval of the license amendment by June 1, 2018. SNC expects to implement this proposed amendment within 30 days of approval of the requested changes.

In accordance with 10 CFR 50.91, SNC is notifying the State of Georgia of this LAR by transmitting a copy of this letter and enclosures to the designated State Official.

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

Should you have any questions, please contact Mr. Adam Quarles at (205) 992-7031.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 15th of December 2017.

Respectfully submitted,

Amy G. Aughtman

Licensing Director, Nuclear Development Southern Nuclear Operating Company

Jones D. Aughtenne

AGA/AGQ/ljs

- Enclosures: 1) 2) (Previously submitted with original LAR-17-028 via ND-17-1417)
 - 3) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 Response to NRC Request for Additional Information Regarding the LAR-17-028 Review (LAR-17-028S1) (Publicly Available Information)
 - 4) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 Response to NRC Request for Additional Information Regarding the LAR-17-028 Review (LAR-17-028S1) (Withheld Information)
 - 5) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 Affidavit from Southern Nuclear Operating Company for Withholding Under 10 CFR 2.390 (LAR-17-028S1)
 - 6) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 CAW-17-4658, Application for Withholding Proprietary Information from Public Disclosure, Affidavit, Proprietary Information Notice, and Copyright Notice (LAR-17-0128S1)
 - 7) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 Supplement to Request for License Amendment Regarding: Increase in MSIV Compartment Pressure (LAR-17-028S1)

U.S. Nuclear Regulatory Commission

ND-17-1975

Page 4 of 4

CC:

Southern Nuclear Operating Company / Georgia Power Company

Mr. S. E. Kuczynski (w/o enclosures)

Mr. M. D. Rauckhorst

Mr. D. G. Bost (w/o enclosures)

Mr. M. D. Meier (w/o enclosures)

Mr. D. H. Jones (w/o enclosures)

Mr. D. L. McKinney (w/o enclosures)

Mr. T. W. Yelverton (w/o enclosures)

Mr. B. H. Whitley

Mr. J. J. Hutto

Mr. C. R. Pierce

Ms. A. G. Aughtman

Mr. D. L. Fulton

Mr. M. J. Yox

Mr. J. Tupik

Mr. W. A. Sparkman

Ms. A. C. Chamberlain

Ms. A. L. Pugh

Mr. J. D. Williams

Document Services RTYPE: VND.LI.L00

File AR.01.02.06

Nuclear Regulatory Commission

Mr. W. Jones (w/o enclosures)

Ms. J. Dixon-Herrity

Mr. C. Patel

Ms. J. M. Heisserer

Mr. B. Kemker

Mr. G. Khouri

Ms. S. Temple

Ms. V. Ordaz

Mr. T. E. Chandler

Ms. P. Braxton

Mr. T. Brimfield

Mr. C. J. Even

Mr. A. Lerch

State of Georgia

Mr. R. Dunn (w/o enclosure 4)

Oglethorpe Power Corporation

Mr. M. W. Price (w/o enclosure 4)

Mr. K. T. Haynes (w/o enclosure 4)

Ms. A. Whaley (w/o enclosure 4)

Municipal Electric Authority of Georgia

Mr. J. E. Fuller (w/o enclosure 4)

U.S. Nuclear Regulatory Commission ND-17-1975 Page 5 of 5

Mr. S. M. Jackson (w/o enclosure 4)

Dalton Utilities

Mr. T. Bundros (w/o enclosure 4)

Westinghouse Electric Company, LLC

Mr. L. Oriani (w/o enclosures)

Mr. G. Koucheravy (w/o enclosures)

Mr. M. Corletti

Mr. M. L. Clyde

Ms. L. Iller

Mr. D. Hawkins

Mr. J. Coward

Other

Mr. S. W. Kline, Bechtel Power Corporation

Ms. L. A. Matis, Tetra Tech NUS, Inc. (w/o enclosure 4)

Dr. W. R. Jacobs, Jr., Ph.D., GDS Associates, Inc. (w/o enclosure 4)

Mr. S. Roetger, Georgia Public Service Commission (w/o enclosure 4)

Ms. S. W. Kernizan, Georgia Public Service Commission (w/o enclosure 4)

Mr. K. C. Greene, Troutman Sanders (w/o enclosure 4)

Mr. S. Blanton, Balch Bingham

Mr. R. Grumbir, APOG

NDDocumentinBox@duke-energy.com, Duke Energy

Mr. S. Franzone, Florida Power & Light

Southern Nuclear Operating Company

ND-17-1975

Enclosure 3

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

Response to NRC Request for Additional Information

Regarding the LAR-17-028 Review

(LAR-17-028S1)

(Publicly Available Information)

(Enclosure 3 consists of 5 pages, including this cover page.)

ND-17-1975 Enclosure 3

Response to NRC Request for Additional Information Regarding the LAR-17-028 Review (LAR-17-028S1) (Publicly Available Information)

NRC RAI Question 30887:

In License Amendment Request LAR-17-[0]28 (dated August 18, 2017), the licensee of Vogtle Units 3 and 4 proposes increasing the design pressure of the main steam isolation valve (MSIV) compartments from 6.0 pounds per square inch (psi) to 6.5 psi, and other changes to the licensing basis regarding the descriptions of the MSIV compartments. In LAR-17-028, the licensee states that essential piping system valves remain qualified for the increase in design pressure. The licensee also states that the structures, systems, and components (SSCs) within the MSIV compartments and adjacent to these compartments are confirmed to be environmentally and structurally qualified for the increase in design pressure. The NRC regulations in 10 CFR Part 50, Appendix A, General Design Criterion (GDC) 4 requires that SSCs important to safety be designed to accommodate the effects of and be compatible with the environmental conditions associated with normal operation, maintenance, testing, and postulated accidents, including loss-of-coolant accidents. To verify compliance with GDC 4, the NRC staff requests that the licensee describe its actions to address the increased MSIV compartment pressure on the structural and environmental qualification of safety-related valves, and the planned setup of safety and relief valves for increased backpressure, for the applicable valves located in these compartments.

SNC Response to NRC RAI Question 30887:

A. Structural

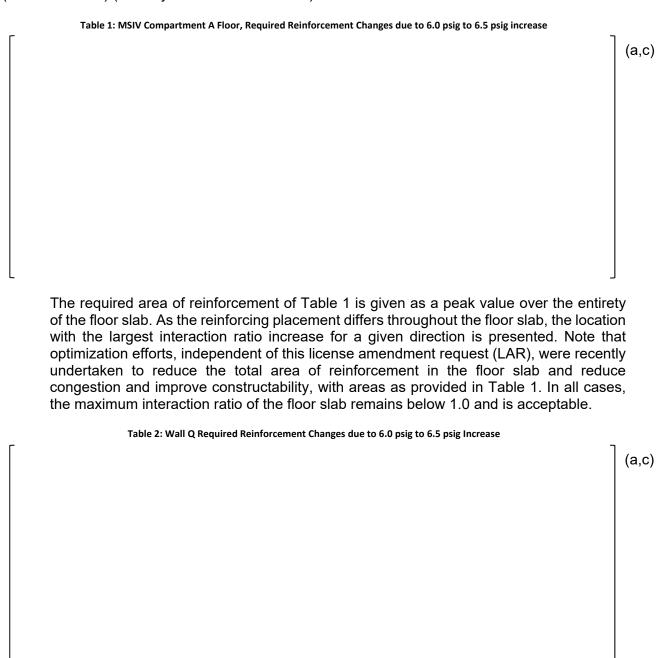
As stated on page 7 of Enclosure 1 to ND-17-1417, the largest increases in required reinforcement, due to the compartment pressurization increase, occurred in the floor of MSIV Compartment A and in Wall Q which forms the west wall of MSIV compartment A. The remainder of the affected floors and walls see increases in required reinforcing demand that are lower, with interaction ratios remaining below 1.0.

The summary of the peak analysis values for the floor of the MSIV Compartment A and Wall Q of MSIV Compartment A are provided in Tables 1 and 2, respectively. As noted in the tables, instances that resulted in an increase in required reinforcement did not result in significant changes in the ratio of the required reinforcement to the provided reinforcement. All ratios remain below 1.0.

(Response continues on next page)

ND-17-1975 Enclosure 3

Response to NRC Request for Additional Information Regarding the LAR-17-028 Review (LAR-17-028S1) (Publicly Available Information)



The required area of reinforcement of Table 2 is given as a peak value over the entirety of the wall elevation. As the reinforcing placement differs throughout the wall elevation, the location with the largest interaction ratio increase for a given direction is presented. Note that optimization efforts, independent of this LAR, were recently undertaken to reduce the total area of reinforcement in the presented elevation of the wall to reduce congestion and improve constructability, with areas as provided in Table 2. In all cases, the maximum interaction ratio of the wall elevation remains below 1.0 and is acceptable.

Response to NRC Request for Additional Information Regarding the LAR-17-028 Review (LAR-17-028S1) (Publicly Available Information)

B. Equipment Qualification

To account for the room pressure increase from 6.0 psig to 6.5 psig, the AP1000 Environmental Conditions specification has been updated to specify the maximum accident pressure of rooms 12404, 12406, 12504, 12506, and 12306 as 6.5 psig. This document establishes the acceptance criteria for environmental qualification of equipment located in those rooms. Note that Room 12306 does not reach an accident pressure of 6.5 psig; but, for EQ purposes, 6.5 psig is conservatively applied.

C. Main Steam Safety Valves

The main steam safety valves (MSSVs) are located in upper MSIV compartments A and B (Rooms 12506 and 12504, respectively). However, the MSSVs vent to atmosphere and are therefore not affected by MSIV compartment pressure. A description of the MSSVs is found in UFSAR Subsection 10.3.2.2.2. The MSSVs are depicted as valves V030A through V035A and V030B through V035B venting to atmosphere in UFSAR Figure 10.3.2-1 Sheets 1 and 2, respectively.

D. Power-Operated Relief Valves

The main steam power operated relief valves (PORVs) are located in lower MSIV compartments A and B (Rooms 12406 and 12404, respectively). However, the main steam PORVs vent to atmosphere and are therefore not affected by MSIV compartment pressure. The main steam PORVs are depicted as valve numbers V233A and V233B venting to atmosphere on UFSAR Figure 10.3.2-1 Sheets 1 and 2, respectively.

E. Main Feedwater and Startup Feedwater Thermal Relief Valves

Table 3: Thermal Relief Valves Added by SNC-LAR-17-012

Valve Tag	Valve Description	Valve Location
SGS-PL-V257A	Main Feedwater Thermal Relief Valve A	Room 12406
SGS-PL-V257B	Main Feedwater Thermal Relief Valve B	Room 12404
SGS-PL-V258A	Startup Feedwater Thermal Relief Valve A	Room 12406
SGS-PL-V258B	Startup Feedwater Thermal Relief Valve B	Room 12404

(Response to NRC RAI Question 30888 is provided on next page)

ND-17-1975 Enclosure 3

Response to NRC Request for Additional Information Regarding the LAR-17-028 Review (LAR-17-028S1) (Publicly Available Information)

NRC RAI Question 30888:

LAR-17-[0]28 states that the pressure relief pathways for both MSIV compartments are the same, with the exception that MSIV Compartment A has an additional pressure relief pathway to the valve/piping penetration room (Room 12306). The NRC staff requests that the licensee describe this additional pressure relief pathway, and its potential impact on the structural and environmental qualification of any applicable safety-related equipment located in Room 12306. Specifically, the NRC staff would like to know if the pressure in this additional pressure relief pathway will increase to higher values than previously determined or used for the qualification for equipment located in this area.

SNC Response to NRC RAI Question 30888:

Lower MSIV Compartment A (Room 12406) vents to the valve/piping penetration room (Room 12306) via three penetrations in the floor of Room 12406. Each penetration is approximately $[]^{(a,c)}$ in diameter; therefore, the total area of these penetrations is approximately $[]^{(a,c)}$. These penetrations are described in ND-17-1417 Enclosure 1 (bottom of page 6 and top of page 7) and on page 2 of Enclosure 2. These three penetrations are also shown in UFSAR Figure 1.2-8. Additionally, the floor penetrations from Room 12406 to Room 12306 are small relative to the other relief paths $[]^{(a,c)}$ which include the following:

- The MSIV compartment roof vent which is [] (a,c)
- The door between the MSIV compartment and the turbine building which is [
] (a,c)
- The MSIV compartment lower relief panel which is [](a,c)

As shown on page 6 of ND-17-1417 Enclosure 1, Lower MSIV Compartment B (Room 12404) has fewer vent paths than Room 12406. Thus, as stated on page 7 of ND-17-1417 Enclosure 1, the limiting case for MSIV compartment pressurization is a main feedwater break in MSIV Compartment B (Room 12404), which results in that compartment reaching 5.97 psig. There is not a relief pathway from Lower MSIV Compartment B (Room 12404) to Room 12306; therefore, Room 12306 is not expected to approach 5.97 psig. Therefore, MSIV Compartment B is the limiting case for the structural and environmental qualification and this room meets the appropriate and applicable design requirements. Despite Room 12306 not exceeding 6.0 psig, the AP1000 Environmental Conditions specification conservatively specifies that equipment in Room 12306 is to be qualified for 6.5 psig external pressure (post-accident).

Southern Nuclear Operating Company

ND-17-1975

Enclosure 4

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

Response to NRC Request for Additional Information

Regarding the LAR-17-028 Review

(LAR-17-028S1)

(Withheld Information)

(Enclosure 4 consists of 5 pages, including this cover page.)

ND-17-1975

Enclosure 5

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

Affidavit from Southern Nuclear Operating Company for Withholding Under 10 CFR 2.390 (LAR-17-028S1)

(Enclosure 5 consists of 3 pages, including this cover page.)

Affidavit of Amy G. Aughtman

- My name is Amy G. Aughtman. I am the Nuclear Development Licensing Director for Southern Nuclear Operating Company (SNC). I have been delegated the function of reviewing proprietary information sought to be withheld from public disclosure and am authorized to apply for its withholding on behalf of SNC.
- 2. I am making this affidavit on personal knowledge, in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations, and in conjunction with SNC's filing on dockets 52-025 and 52-026, Vogtle Electric Generating Plant (VEGP) Units 3 and 4, Supplement to Request for License Amendment Regarding: Increase in MSIV Compartment Pressure (LAR-17-028S1). I have personal knowledge of the criteria and procedures used by SNC to designate information as a trade secret, privileged or as confidential commercial or financial information.
- Based on the reason(s) at 10 CFR 2.390(a)(4), this affidavit seeks to withhold from public disclosure Enclosure 4 of SNC letter ND-17-1975 for Vogtle Electric Generating Plant (VEGP) Units 3 and 4, Supplement to Request for License Amendment Regarding: Increase in MSIV Compartment Pressure (LAR-17-028S1).
- 4. The following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.
 - a. The information sought to be withheld from public disclosure has been held in confidence by SNC and Westinghouse Electric Company.
 - The information is of a type customarily held in confidence by SNC and
 Westinghouse Electric Company and not customarily disclosed to the public.

Affidavit from Southern Nuclear Operating Company for Withholding Under 10 CFR 2.390 (LAR-17-028S1)

- c. The release of the information might result in the loss of an existing or potential competitive advantage to SNC and/or Westinghouse Electric Company.
- d. Other reasons identified in Enclosure 6 of SNC letter ND-17-1975 for Vogtle Electric Generating Plant (VEGP) Units 3 and 4, Supplement to Request for License Amendment Regarding: Increase in MSIV Compartment Pressure (LAR-17-028S1), and those reasons are incorporated here by reference.
- 5. Additionally, release of the information may harm SNC because SNC has a contractual relationship with the Westinghouse Electric Company regarding proprietary information.
 SNC is contractually obligated to seek confidential and proprietary treatment of the information.
- 6. The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.390, it is to be received in confidence by the Commission.
- 7. To the best of my knowledge and belief, the information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method.

I declare under penalty of perjury that the foregoing is true and correct.

amy	ID. Aug	betime	Executed on	12/15/2017
U	Amy.	G. Aughtman		Date

Southern Nuclear Operating Company

ND-17-1975

Enclosure 6

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

CAW-17-4658, Application for Withholding Proprietary Information from Public Disclosure, Affidavit, Proprietary Information Notice, and Copyright Notice

(LAR-17-028S1)

Westinghouse Non-Proprietary Class 3



Westinghouse Electric Company New Plants and Major Projects 1000 Westinghouse Drive, Building 1 Cranberry Township, Pennsylvania 16066 USA

Document Control Desk U S Nuclear Regulatory Commission Washington, DC 20852-2738 Direct tel: (412) 374-4372 Direct fax: (724) 940-8505

e-mail: monohajs@westinghouse.com

Proj letter: SVP_SV0_005108

CAW-17-4658

December 11, 2017

APPLICATION FOR WITHHOLDING PROPRIETARY INFORMATION FROM PUBLIC DISCLOSURE

Subject: Westinghouse Response to SNC RFI ND-VOGTLE34-RFI-1006 (Proprietary)

The Application for Withholding Proprietary Information from Public Disclosure is submitted by Westinghouse Electric Company LLC ("Westinghouse"), pursuant to the provisions of paragraph (b)(1) of Section 2.390 of the Nuclear Regulatory Commission's ("Commission's") regulations. It contains commercial strategic information proprietary to Westinghouse and customarily held in confidence.

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-17-4658 signed by the owner of the proprietary information, Westinghouse. The Affidavit, which accompanies this letter, sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR Section 2.390 of the Commission's regulations.

Accordingly, this letter authorizes the utilization of the accompanying Affidavit by Southern Nuclear Company.

Correspondence with respect to the proprietary aspects of the Application for Withholding or the Westinghouse Affidavit should reference CAW-17-4658, and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 3 Suite 310, Cranberry Township, Pennsylvania 16066.

Very truly yours,

Paul A. Russ, Director

Licensing and Regulatory Affairs - Americas

Westinghouse Non-Proprietary Class 3



Westinghouse Electric Company New Plants and Major Projects 1000 Westinghouse Drive, Building 1 Cranberry Township, Pennsylvania 16066 USA

Enclosures to CAW-17-4658

- 1. AFFIDAVIT CAW-17-4658
- 2. PROPRIETARY INFORMATION NOTICE and COPYRIGHT NOTICE
- 3. SV0-GW-GF-009 Revision 0 (Proprietary)
- 4. SV0-GW-GF-010 Revision 0 (Non-Proprietary)

ENCLOSURE 1 to CAW-17-4658

AFFIDAVIT

Westinghouse Non-Proprietary Class 3

CAW-17-4658 December 11, 2017

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

SS

COUNTY OF BUTLER:

I, Paul A. Russ, am authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC ("Westinghouse"), and declare that the averments of fact set forth in this Affidavit are true and correct to the best of my knowledge, information, and belief.

Paul A. Russ, Director

Licensing and Regulatory Affairs - Americas

Date: 12/11/2017

- (1) I am Director, Americas Licensing and Nuclear Regulatory Affairs, Westinghouse Electric Company LLC ("Westinghouse"), and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing and rule making proceedings, and am authorized to apply for its withholding on behalf of Westinghouse.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Nuclear Regulatory Commission's ("Commission's") regulations and in conjunction with the Westinghouse Application for Withholding Proprietary Information from Public Disclosure accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by Westinghouse in designating information as a trade secret, privileged or as confidential commercial or financial information.
- (4) Pursuant to the provisions of paragraph (b)(4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.
 - (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by Westinghouse.
 - (ii) The information is of a type customarily held in confidence by Westinghouse and not customarily disclosed to the public. Westinghouse has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The application of that system and the substance of that system constitute Westinghouse policy and provide the rational basis required.

Under that system, information is held in confidence if it falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:

(a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of

3

Westinghouse's competitors without license from Westinghouse constitutes a competitive economic advantage over other companies.

- (b) It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data secures a competitive economic advantage, e.g., by optimization or improved marketability.
- (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.
- (d) It reveals cost or price information, production capacities, budget levels, or commercial strategies of Westinghouse, its customers or suppliers.
- (e) It reveals aspects of past, present, or future Westinghouse or customer funded development plans and programs of potential commercial value to Westinghouse.
- (f) It contains patentable ideas, for which patent protection may be desirable.
- (iii) There are sound policy reasons behind the Westinghouse system which include the following:
 - (a) The use of such information by Westinghouse gives Westinghouse a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the Westinghouse competitive position.
 - (b) It is information that is marketable in many ways. The extent to which such information is available to competitors diminishes the Westinghouse ability to sell products and services involving the use of the information.
 - (c) Use by our competitor would put Westinghouse at a competitive disadvantage by reducing his expenditure of resources at our expense.

- (d) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving Westinghouse of a competitive advantage.
- (e) Unrestricted disclosure would jeopardize the position of prominence of Westinghouse in the world market, and thereby give a market advantage to the competition of those countries.
- (f) The Westinghouse capacity to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.
- (iv) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.390, it is to be received in confidence by the Commission.
- (v) The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of our knowledge and belief.
- (vi) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in SV0-GW-GF-009 Revision 0, "Westinghouse Response to SNC RFI ND-VOGTLE34-RFI-1006" (Proprietary), for submittal to the Commission, being transmitted by Southern Nuclear Company letter. The proprietary information as submitted by Westinghouse is that associated with submittals related to Westinghouse LAR-091, and may be used only for that purpose.
 - (a) This information is part of that which will enable Westinghouse to:
 - (i) Provide the NRC and customers with technical information related to the Westinghouse LAR-091 submittal.

- (b) Further this information has substantial commercial value as follows:
 - (i) Westinghouse plans to sell the use of similar information to its customers for the purpose of providing similar products and services.
 - (ii) Westinghouse can sell support and defense of industry guidelines and acceptance criteria for plant-specific applications.
 - (iii) The information requested to be withheld reveals the distinguishing aspects of a methodology which was developed by Westinghouse.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse because it would enhance the ability of competitors to provide similar technical evaluation justifications and licensing defense services for commercial power reactors without commensurate expenses. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

The development of the technology described in part by the information is the result of applying the results of many years of experience in an intensive Westinghouse effort and the expenditure of a considerable sum of money.

In order for competitors of Westinghouse to duplicate this information, similar technical programs would have to be performed and a significant manpower effort, having the requisite talent and experience, would have to be expended.

Further the deponent sayeth not.

ENCLOSURE 2 to CAW-17-4658

PROPRIETARY INFORMATION NOTICE and COPYRIGHT NOTICE

PROPRIETARY INFORMATION NOTICE

Transmitted herewith are proprietary and/or non-proprietary versions of documents furnished to the NRC in connection with requests for generic and/or plant-specific review and approval.

In order to conform to the requirements of 10 CFR 2.390 of the Commission's regulations concerning the protection of proprietary information so submitted to the NRC, the information which is proprietary in the proprietary versions is contained within brackets, and where the proprietary information has been deleted in the non-proprietary versions, only the brackets remain (the information that was contained within the brackets in the proprietary versions having been deleted). The justification for claiming the information so designated as proprietary is indicated in both versions by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary or in the margin opposite such information. These lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (4)(ii)(a) through (4)(ii)(f) of the Affidavit accompanying this transmittal pursuant to 10 CFR 2.390(b)(1).

COPYRIGHT NOTICE

The reports transmitted herewith each bear a Westinghouse copyright notice. The NRC is permitted to make the number of copies of the information contained in these reports which are necessary for its internal use in connection with generic and plant-specific reviews and approvals as well as the issuance, denial, amendment, transfer, renewal, modification, suspension, revocation, or violation of a license, permit, order, or regulation subject to the requirements of 10 CFR 2.390 regarding restrictions on public disclosure to the extent such information has been identified as proprietary by Westinghouse, copyright protection notwithstanding. With respect to the non-proprietary versions of these reports, the NRC is permitted to make the number of copies beyond those necessary for its internal use which are necessary in order to have one copy available for public viewing in the appropriate docket files in the public document room in Washington, DC and in local public document rooms as may be required by NRC regulations if the number of copies submitted is insufficient for this purpose. Copies made by the NRC must include the copyright notice in all instances and the proprietary notice if the original was identified as proprietary.

Southern Nuclear Operating Company

ND-17-1975

Enclosure 7

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

Supplement to Request for License Amendment Regarding:
Increase in MSIV Compartment Pressure
(LAR-17-028S1)

Additions identified by blue underlined text.

Deletions identified by red strikethrough of text.

* * Indicates omitted existing text that is not shown.

(Enclosure 7 consists of 2 pages, including this cover page.)

ND-17-1975 Enclosure 7

Supplement to Request for License Amendment Regarding: Increase in MSIV Compartment Pressure (LAR-17-028S1)

Page 4 of Enclosure 1 describes the arrangement of the MSIV compartments relative to adjacent rooms. The bottom paragraph of page 4 describes Lower MSIV Compartment B as venting to the turbine building through the piping/valve penetration room below; this should state Lower MSIV Compartment A vents in this manner. Therefore, the second sentence of this paragraph is revised to read as follows:

* * *

The purpose of the MSIV compartment pressure relief devices is to relieve pressure from postulated pipe breaks in the MSIV compartments into the turbine building (and for the lower MSIV Compartment <u>BA</u>, to the turbine building through the piping/valve penetration room below), through drains and vents to the turbine building and through the roof to the atmosphere in an MSIV compartment.

* * *