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52-026

ND-18-0199
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 Regarding
Technical Specifications for Reactor Coolant System Vacuum Fill and
Inspections, Tests, Analyses, and Acceptance Criteria for Containment Floodup
(LAR-17-027S3)

Ladies and Gentlemen:

Pursuant to 10 CFR 52.98(c) and in accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC) previously requested an amendment to the combined licenses (COLs) for Vogtle Electric Generating Plant (VEGP) Units 3 and 4 (License Nos. NPF-91 and NPF-92, respectively). The requested amendment proposes changes to COL Appendix A, Technical Specifications (TS), COL Appendix C (and plant-specific Design Control Document (DCD) Tier 1) information, and plant-specific DCD Tier 2 information.

SNC originally submitted this request by SNC letter ND-17-1558, dated September 25, 2017 [ADAMS Accession Number ML17268A188]. Supplement 1 to LAR-17-027 was submitted by SNC letter ND-17-1931, dated November 16, 2017 [ADAMS Accession Number ML17320A808] to update certain instrumentation function names. Supplement 2 was submitted by SNC letter ND-17-2040, dated December 18, 2017 [ADAMS Accession Number ML17352B003] to provide additional conforming changes to TS Surveillance Requirements.

Four editorial oversights have been discovered in the markups provided in ND-17-1558 for Limiting Condition for Operation (LCO) 3.4.13 that require an additional supplement to correct. First, the original LAR submittal Enclosure 3, page 12 of 17 shows LCO 3.4.13 A.1 stated as (*emphasis added*) "Five flow paths in ADS stage 1, 2, and 3 shall be OPERABLE" and LCO 3.4.13 B.1 stated as "Three flow paths in ADS stage 1, 2, and 3, with a minimum of two flow paths in ADS stage 2 or 3, shall be OPERABLE." In each case, "OPERABLE" should be "open." The use of "open" for the required Automatic Depressurization System (ADS) Stage 1, 2, and 3 flow paths, is consistent with the proposed definition of "Vented" (which references LCO 3.4.13) and further supported by the submitted LAR discussion (Enclosure 1 page 12 of 26) as well as the submitted Bases (Enclosure 4, page 15 of 20). The second editorial correction involves original LAR

submittal Enclosure 3, page 14 of 17, which shows the deletion of "while" in three locations. There is a fourth "while" to be deleted in the last Condition C statement on this page. These deletions are described and supported by the submitted LAR discussion (Enclosure 1 page 14 of 26) of editorial changes. The third correction involves original LAR submittal Enclosure 3, page 15 of 17 showing the proposed changes to the revised LCO 3.5.3, Condition E, which includes adding the phrase "of Condition A, B, or C." The phrase is revised to "of Condition A, B, or D." The Condition C reference should have been revised to align with the renumbering of existing Condition "C" to "D." The fourth correction involves original LAR submittal Enclosure 3, page 16 of 17 showing the proposed change adding SR 3.5.3.2 and the Frequency of "In accordance with applicable SRs." Since only one SR is listed, the Frequency should be "In accordance with applicable SR." This supplement updates LAR-17-027 to reflect the necessary corrections as shown in Enclosure 10.

Enclosure 10 provides the applicable corrected markups.

Note that the original exemption request is not impacted by these changes.

The supplemental information provided in this letter, including Enclosure 10, does not change the scope of the original submittal, or alter the conclusions of the Significant Hazards Consideration Determination or Environmental Considerations submitted in LAR-17-027.

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

SNC requests approval of the license amendment, and granting of the associated exemption, no later than March 30, 2018 (as originally requested). Approval by this date will allow sufficient time to implement licensing basis changes necessary to support procedure development in relation to conducting the necessary operator training to support plant operations. SNC expects to implement the 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 license amendment request supplement by transmitting a copy of this letter and its enclosure to the designated State Official.

Should you have any questions, please contact Mr. Wesley A. Sparkman at (205) 992-5061.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 14th of February 2018.

Respectfully submitted,



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

- Enclosures: 1) - 4) (previously submitted with the original LAR, LAR-17-027, in SNC letter ND-17-1558)
- 5) - 6) (previously submitted with Supplement 1 to LAR-17-027, in SNC letter ND-17-1931)
- 7) – 9) (previously submitted with Supplement 2 to LAR-17-027, in SNC letter ND-17-2040)
- 10) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 - Supplement to Proposed Changes to the Licensing Basis Documents (LAR-17-027S3)

cc:

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Southern Nuclear Operating Company

ND-18-0199

Enclosure 10

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

Supplement to Proposed Changes to the Licensing Basis Documents

(LAR-17-027S3)

Additions identified by blue underlined text.

~~Deletions identified by red strikethrough of text.~~

Yellow Highlight indicates changes from original submittal

* * * indicates omitted text that is not shown.

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

This replaces the corresponding markup on ND-17-1558, Enclosure 3, page 12 of 17

* * *

COL Appendix A, Technical Specifications, Specification 3.4.13

LCO 3.4.13

~~ADS stage 1, 2, and 3 flow paths shall be open.
Two ADS stage 4 flow paths shall be OPERABLE.~~

A. With reactor subcritical for < 28 hrs:

1. Five flow paths in ADS stage 1, 2, and 3 shall be open; and
2. Four flow paths in ADS stage 4 shall be OPERABLE

B. With reactor subcritical for \geq 28 hrs:

1. Three flow paths in ADS stage 1, 2, and 3, with a minimum of two flow paths in ADS stage 2 or 3, shall be open; and
2. Three flow paths in ADS stage 4 shall be OPERABLE

This replaces the corresponding markup on ND-17-1558, Enclosure 3, page 14 of 17
 (for Specification 3.4.13)

* * *

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>C. Required Action and associated Completion Time of Condition A or B not met while in MODE 5.</p> <p><u>OR</u></p> <p><u>Condition A and Condition B entered concurrently in MODE 5.</u></p> <p><u>OR</u></p> <p>LCO not met for reasons other than Condition A or B while in MODE 5.</p>	<p>C.1 Initiate action to fill the RCS to establish $\geq 20\%$ pressurizer level.</p> <p><u>AND</u></p> <p>C.2 Suspend positive reactivity additions.</p> <p><u>AND</u></p> <p><u>C.3 Initiate action to establish RCS VENTED condition.</u></p>	<p>Immediately</p> <p>Immediately</p> <p><u>Immediately</u></p>
<p>D. Required Action and associated Completion Time of Condition A or B not met while in MODE 6.</p> <p><u>OR</u></p> <p><u>Condition A and Condition B entered concurrently in MODE 6.</u></p> <p><u>OR</u></p> <p>LCO not met for reasons other than Condition A or B while in MODE 6.</p>	<p>D.1 Initiate action to remove the upper internals.</p> <p><u>AND</u></p> <p>D.2 Suspend positive reactivity additions.</p>	<p>Immediately</p> <p>Immediately</p>

This replaces the corresponding markup on ND-17-1558, Enclosure 3, page 15 of 17

* * *

COL Appendix A, Technical Specifications, Specification 3.5.3

LCO 3.5.3 One CMT shall be OPERABLE.

APPLICABILITY: MODE 4 with the RCS cooling provided by the Normal Residual Heat Removal System (RNS).
 MODE 5 with the RCS not VENTED~~pressure boundary intact~~.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
* * *	* * *	* * *
<u>C.</u> <u>Required CMT inlet line noncondensable gas volume not within limit in MODE 4.</u>	<u>C.1</u> <u>Restore CMT inlet line noncondensable gas volume to within limit.</u> <u>OR</u> <u>C.2</u> <u>Be in MODE 5.</u>	<u>24 hours</u> <u>24 hours</u>
<u>D</u> <u>C.</u> Required CMT inoperable for reasons other than Condition <u>A</u> , <u>B</u> , or <u>C</u> <u>B</u> .	<u>D</u> <u>C</u> .1 Restore required CMT to OPERABLE status.	8 hours
<u>E</u> <u>D.</u> Required Action and associated Completion Time of <u>Condition A, B, or C</u> <u>D</u> not met.	<u>E</u> <u>D</u> .1 Initiate action to be in MODE 5 with RCS <u>VENTED</u> pressure boundary open .	Immediately

This replaces the corresponding markup on ND-17-1558, Enclosure 3, page 16 of 17
(for Specification 3.5.3)

* * *

<p><u>SR 3.5.3.2</u></p> <p>-----</p> <p style="text-align: center;"><u>- NOTE -</u></p> <p><u>Only required to be met in MODE 4 with RCS cooling provided by the Normal Residual Heat Removal System (RNS).</u></p> <p>-----</p> <p><u>For the CMT required to be OPERABLE, the following SR is applicable:</u></p> <p><u>SR 3.5.2.4</u></p>	<p><u>In accordance with applicable SRs</u></p>
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