

March 28, 2018

Docket Nos.: 52-025
52-026

ND-18-0347
10 CFR 50.90
10 CFR 52.63

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 and Exemption Regarding
Unqualified Service Level I Coatings Program (LAR-17-039S1)

Ladies and Gentlemen:

Pursuant to 10 CFR 52.98(c) and in accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC), the licensee for Vogtle Electric Generating Plant (VEGP) Units 3 and 4, requested an amendment to Combined License (COL) Numbers NPF-91 and NPF-92, for VEGP Units 3 and 4, respectively, by SNC letter ND-17-1828, dated November 3, 2017 [ADAMS Accession Number ML17307A201]. This license amendment request (LAR), LAR-17-039, would allow for an administrative program to manage a limited quantity of unqualified coatings in Service Level I areas of the containment. 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 DCD Tier 1 material departure.

Enclosure 4 supplements LAR-17-039 by addressing a Request for Additional Information (RAI) from the NRC Staff, which was transmitted by electronic mail (email) on March 1, 2018 [ML18060A396], to support review of LAR-17-039.

The 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-17-1828.

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 enclosure to the designated State Official.

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 28th of March 2018.

Respectfully submitted,



Amy G. Aughtman
Licensing Director, Nuclear Development
Southern Nuclear Operating Company

- Enclosures: 1 - 3) (previously submitted with the original LAR, LAR-17-039, in SNC letter ND-17-1828)
- 4) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Response to NRC Request for Additional Information (RAI) Regarding the LAR-17-039 Review (LAR-17-039S1)

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Enclosure 4

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

**Response to NRC Request for Additional Information (RAI)
Regarding the LAR-17-039 Review**

(LAR-17-039S1)

(Enclosure 4 consists of 2 pages, including this cover page.)

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Enclosure 4

Response to NRC Request for Additional Information (RAI) Regarding the LAR-17-039 Review (LAR-17-039S1)

The following is a request for additional information (RAI) provided by the NRC Staff via email dated March 1, 2018 [ML18060A396] regarding the review of Southern Nuclear Operating Company (SNC) License Amendment Request (LAR) 17-039, which was submitted by SNC letter ND-17-1828 on November 3, 2017 [ML17307A201].

RAI 1, Question 1

The NRC staff is unclear on the scope of the request, therefore, please address the following regarding nonconforming coatings and Service Level I epoxy coatings:

- a. The request proposes to add the following paragraph to the end of Subsection 6.1.2.1.5 in Tier 2 of the Updated Final Safety Analysis Report (UFSAR): "Nonconforming coatings that cannot be qualified as Service Level I are evaluated on a case basis relative to impact on plant safety. The total inventory of unqualified coatings (coatings which cannot be qualified as Safety-Service Level I) within Service Level I areas combined with the total amount of coating debris fines that can be generated by a LOCA [loss of coolant accident] jet is restricted to the limits established in Subsection 6.3.2.2.7.1." It is the NRC staff's understanding that the proposed amendment is for coatings that could have been qualified as Service Level I but qualification cannot be verified. If the request is for more than coatings that could have been qualified as Service Level I but whose qualification could not be verified, please provide examples so that the NRC staff can fully understand the scope of this request.
- b. Please explain the applicability of this request to any epoxy coatings designated as Service Level I. The request appears to consider only IOZ, but the proposed changes to Tier 2 of the UFSAR are not limited to IOZ. For example, the proposed text for Subsection 6.1.2.1.5 in Tier 2 of the UFSAR seems to apply to all Service Level I coatings and does not suggest that it applies only to IOZ coatings that are not qualified as Service Level I. If the absence of Service Level I epoxy is a result of differences between VEGP, Units 3 and 4, and the AP1000 certified design, please identify and explain those differences.

SNC Response to RAI 1, Question 1

- a. The NRC staff's understanding is correct. The proposed amendment is for coatings that could have been qualified as Service Level I but qualification cannot be verified. Examples of potential reasons why a coating's qualification could not be verified are provided in the second full paragraph on page 4 of Enclosure 1 of ND-17-1828 [ML17307A201].
- b. LAR-17-039 is applicable to all Service Level I coatings inside containment and is not limited only to inorganic zinc (IOZ) coatings. As stated in UFSAR Table 6.1-2, the epoxy top coat applied to the inside surface of the containment shell is the only Service Level I coating other than IOZ. Instances of unqualified Service Level I epoxy coatings are not expected; however, such instances would be reviewed, dispositioned, and managed following the same process (in accordance with ASTM D 7491-08) as for IOZ.