

Vogle PEmails

From: Habib, Donald
Sent: Wednesday, April 18, 2018 2:32 PM
To: WASPARKM@southernco.com
Cc: Patel, Chandu; Chamberlain, Amy Christine; Vogtle PEmails; Dixon-Herrity, Jennifer; x2nhagge@southernco.com; Amundson, Theodore Edwin; Hicks, Thomas E.
Subject: Draft RAI Related to Vogtle Units 3 and 4 LAR 17-037 Regarding Tier 2* Departure Process
Attachments: SCVB RAI_9537 for LAR 17-037 Draft to SNC.docx

To All –

Attached is a draft RAI related to Vogtle Units 3 and 4 LAR 17-037 regarding the Tier 2* departure process.

If you would like to schedule a clarification conference call to discuss this RAI, please let me know before 4pm on Monday, April 23, 2018. If no request for a conference call is received, this RAI will be issued as final.

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NRO/DNRL, Licensing Branch 4
301-415-1035

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Subject: Draft RAI Related to Vogtle Units 3 and 4 LAR 17-037 Regarding Tier 2*
Departure Process
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From: Habib, Donald
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Options

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LAR 17-037

Request for Additional Information – DRAFT

Issue Date:

Application Title: VEGP Units 3 and 4 - LARs
Operating Company: Southern Nuclear Operating Co.
Docket No. 52-025 and 52-026

The process for changes and departures from Tier 2* information is provided, in part, in 10 CFR Part 52 Appendix D Section VIII.B.6.b (i.e., Tier 2* matters that do not expire at full power) and states that departures from Tier 2* will be treated as a license amendment request and require prior staff review and approval.

SECY-17-0075 (ML16196A321) provides regulatory insights regarding Tier 2* content. Per SECY-17-0075, the purpose of the Tier 2* designation is to control certain information which the staff has determined to have safety significance commensurate with Tier 1 information. Any modification to the Tier 2* change process must still ensure that information with safety significance commensurate with that of Tier 1 information is controlled in a similar manner (e.g. changes to such information require prior staff review and approval).

Part 52 Appendix D, Section VIII.B.6.b Item (7), "Screen design criteria," (for containment sump screens) is one of the items designated as Tier 2* information for the AP1000 design. LAR 17-037 proposes to evaluate departures from item (7) in part by applying a screening criterion identified as Qualifying Criterion 4, "[a]dversely affects the debris screen design criteria."

LAR 17-037 Enclosure 1 provides screening guidance used to assess if a proposed change is adverse with respect to Qualifying Criterion 4. Specifically, "[a]n adverse change is any change that would be considered a non-conservative change of a debris value established in the UFSAR" and "[a]n adverse change would be any change that changes any element of the evaluations used to determine the design of the debris screens."

The staff requests that the applicant provide the following information in the LAR:

1. Identify the DCD/UFSAR Section(s) which contain(s) information subject to LAR 17-037 Qualifying Criterion 4 and associated guidance.
2. Identify the debris value(s) that are subject to Qualifying Criterion 4.
3. State your evaluation (e.g., in the Qualifying Criterion 4 bases section) of any relaxation of the debris values identified in response to item (2) above and state whether each relaxation adversely affects the debris screen design criteria, including in-vessel debris effects on long-term core cooling. Explain the basis for your conclusion regarding each relaxation, whether adverse or not adverse.
4. Identify a) the elements of the evaluations used to determine the design of the debris screens that are subject to Qualifying Criterion 4 and b) the debris screens that are subject to Qualifying Criterion 4.
5. State your evaluation (e.g., in the Qualifying Criterion 4 bases section) of any relaxation to any element of the evaluations used to determine the design of the debris screens associated with item 4) above (other than debris values) and state whether each relaxation adversely affects any element of the evaluations used to determine the design

of the debris screens. Explain the basis for your conclusion regarding each relaxation, whether adverse or not adverse.

6. Revise license condition 2.D.(13)(a)4 (i.e., Qualifying Criterion 4) to include containment debris limits in addition to debris screen design criteria.

As part of the response, provide a markup of the LAR to reflect this information request or describe in detail why it is not necessary.