

Vogle PEmails

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Sent: Friday, April 27, 2018 10:26 AM
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Subject: Draft RAI Related to Vogle Units 3 and 4 LAR 17-037 Regarding Tier 2* Departure Process
Attachments: ARPB - RAI_9544 for LAR 17-037 Draft to SNC.docx

To All –

Attached is a draft RAI related to Vogle 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 Noon on Wednesday, May 2, 2018. If no request for a conference call is received, this RAI will be issued as final.

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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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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

As noted in SNC's license amendment request (LAR) (ML17355A416), SECY-17-0075, "Planned Improvements in Design Certification Tiered Information Designations," (ML16196A321) describes how the purpose of the Tier 2* designation is to control certain information which the staff has determined to have safety significance commensurate with that of Tier 1 information. NRC's letter dated January 25, 2018, which accepted the LAR for review (ML18019A362), stated that the process criteria and guidance described in the application do not clearly differentiate between Tier 2* information with safety significance commensurate with Tier 1, and any Tier 2* information which does not warrant the same level of control. For example, Criteria 2 and 3 address "a material change," but do not clearly describe how controls on those changes ensure information with safety significance commensurate with Tier 1 is not modified without prior NRC review and approval.

Another example is the guidance for Criteria 1, 2, and 3, which includes statements that the process is intended to permit changes to achieve consistency within the document. However, it is not clear how SNC intends to determine that a Tier 2* change is appropriate to achieve consistency, when changing other information outside the scope of Tier 2* is more appropriate. For example, if a discrepancy between Tier 1 and Tier 2* is identified, changing Tier 2* is appropriate if Tier 1 is correct. However, if Tier 2* is correct, then a Tier 1 change is needed.

Furthermore, Enclosure 5 identifies the categories of Tier 2* information the licensee plans to screen by the proposed process. However, Enclosure 5 does not identify what portions of Tier 2* information it considers to contain information that has safety significance commensurate with Tier 1.

Additionally, page 8 of the LAR states that SNC performed an analysis of Tier 2* matters against several criteria, including "safety significance." However, it is not clear to the staff how this criteria was applied to the existing Tier 2* material.

Therefore, SNC is requested to provide a discussion of how the process described in the proposed amendment clearly differentiates between Tier 2* information with safety significance commensurate with Tier 1 and other information which does not warrant the same level of control.