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ND-18-0610
10 CFR 50.90

U.S. Nuclear Regulatory Commission
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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4
Supplement to Request for License Amendment:
Technical Specification Applicability Changes to Support
Pressurizer Safety Valve Operability (LAR-18-004S1)

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 to the combined licenses (COLs) for Vogtle Electric Generating Plant (VEGP) Units 3 and 4 (License Numbers NPF-91 and NPF-92, respectively), by SNC letter ND-18-0053, dated January 31, 2018 [ADAMS Accession Number ML18031B131].

The request proposed changes to TS 3.4.6, Pressurizer Safety Valve, Applicability to require the pressurizer safety valves (PSVs) to be operable when the TS 3.4.14, Low Temperature Overpressure Protection, is not required to be operable. A conforming change to the TS 3.4.6 Actions is also proposed. Additional TS changes necessary to support PSV operability are proposed for consistency with the TS 3.4.6 change.

The request also proposed moving TS Limiting Condition for Operation (LCO) Notes regarding reactor coolant pump (RCP) starts from TS 3.4.4, Reactor Coolant System (RCS) Loops, 3.4.8, Minimum RCS Flow, and 3.4.14 to TS 3.4.3 RCS Pressure / Temperature (P/T) Limits.

Enclosure 4 to this letter supplements LAR-18-004 to address a Draft Request for Additional Information (RAI) from the NRC Staff, which was transmitted by electronic mail (email) on April 2, 2018 [ADAMS Accession Number ML18092A258], to support review of LAR-18-004. This supplement does not impact the scope, document markups, technical content, or conclusions of the Technical Evaluation, Significant Hazards Consideration Determination, or Environmental Considerations of the original License Amendment Request (LAR) provided in Enclosures 1, 2 and 3 of SNC letter ND-18-0053.

This letter contains no regulatory commitments. This letter has been reviewed and determined not to contain security related information.

SNC requests staff approval of the license amendment by July 31, 2018 (as originally requested) to support Operator training updates. Delayed approval of this license amendment could result in a delay in Operator training updates and subsequent dependent construction activities. 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 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 2nd of May 2018.

Respectfully submitted,



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

Enclosure: 4) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Response to NRC Draft Request for Additional Information (RAI) Regarding LAR 18-004 (LAR-18-004S1)

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ND-18-0610

Enclosure 4

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

**Response to NRC Draft Request for Additional Information (RAI) Regarding LAR 18-004
(LAR-18-004S1)**

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

ND-18-0610

Enclosure 4

Response to NRC Draft Request for Additional Information (RAI) Regarding LAR-18-004 (LAR-18-004S1)

The following draft request for additional information (RAI) [ADAMS Accession Number ML18092A258] regarding the review of Southern Nuclear Operating Company (SNC) License Amendment Request (LAR) 18-004, submitted by SNC letter ND-18-0053, was provided by the NRC Staff on April 2, 2018.

Draft Request for Additional Information (RAI):

The following is the regulatory basis as well as the draft Request for Additional Information question related to LAR 18-004 for Vogtle Units 3 and 4.

The NRC regulations in 10 CFR Part 50, Appendix A, "General Design Criteria for Nuclear Power Plants," General Design Criterion (GDC) 14, "Reactor coolant pressure boundary," state that the reactor coolant pressure boundary (RCPB) shall be designed, fabricated, erected, and tested so as to have an extremely low probability of abnormal leakage, of rapidly propagating failure, and of gross rupture. In addition, GDC 30, "Quality of reactor coolant pressure boundary," in 10 CFR Part 50, Appendix A, states, in part, that components which are part of the RCPB shall be designed, fabricated, erected, and tested to the highest quality standards practical.

In License Amendment Request (LAR) 18-004 (dated January 31, 2018), Southern Nuclear Operating Company (SNC) requested an amendment to the Combined Licenses (COLs) for Vogtle Electric Generating Plant (VEGP) Units 3 and 4 to modify the VEGP Units 3 and 4 COL Appendix A, Technical Specifications (TS). Among the proposed changes in LAR-18-004, SNC requests changes to TS 3.4.6, Pressurizer Safety Valve, Applicability, to require the pressurizer safety valves (PSVs) to be operable when the TS 3.4.14, Low Temperature Overpressure Protection, is not required to be operable. The NRC staff requests that SNC indicate whether any changes in the performance requirements or operating conditions are necessary for the PSVs or any other valves for the implementation of LAR-18-004. If so, the staff requests that SNC describe the plans to incorporate those performance requirements and operating conditions as part of the qualification of those valves in accordance with American Society of Mechanical Engineers (ASME) Standard QME-1-2007, "Qualification of Active Mechanical Equipment Used in Nuclear Power Plants," as accepted in NRC Regulatory Guide 1.100 (Revision 3), "Seismic Qualification of Electrical and Active Mechanical Equipment and Functional Qualification of Active Mechanical Equipment for Nuclear Power Plants."

SNC Response to Draft RAI:

There are no changes necessary to the performance requirements or operating conditions for the pressurizer safety valves (PSVs) or any other valves for the implementation of LAR-18-004. LAR-18-004 changes the Technical Specification (TS) 3.4.6, Pressurizer Safety Valves, Applicability for Mode 4 from "MODE 4 with RNS isolated or RCS temperature $\geq 275^{\circ}\text{F}$." to "MODE 4 with all four cold leg temperatures $> 275^{\circ}\text{F}$." The change aligns the Mode 4 applicability of TS 3.4.6 with TS 3.4.14, Low Temperature Overpressure Protection (LTOP). The changes impose operational restrictions different from what was previously defined, but the PSVs and other valves, including the LTOP valves, will continue to operate within the requirements of the design specifications and meet the performance requirements specified in the system specifications and Technical Specifications with no necessary modifications to the valves.