



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

June 12, 2018

MEMORANDUM TO: Jennifer Dixon-Herrity, Chief  
Licensing Branch 4  
Division of Licensing, Siting, and  
Environmental Analysis  
Office of New Reactors

FROM: Don Habib, Project Manager /RA/  
Licensing Branch 4  
Division of Licensing, Siting, and  
Environmental Analysis  
Office of New Reactors

SUBJECT: AUDIT PLAN FOR VOGTLE ELECTRIC GENERATING PLANT  
UNITS 3 AND 4, REQUEST FOR LICENSE AMENDMENT AND  
EXEMPTION: CHANGES TO TIER 2\* DEPARTURE  
EVALUATION PROCESS (LAR 17-037)

By letter dated December 21, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML17355A416), Southern Nuclear Operating Company (the licensee) requested an amendment to Combined License Numbers NPF-91 and NPF-92, for Vogtle Electric Generating Plant (VEGP) Units 3 and 4.

The requested amendment and exemption requires changes to the combined licenses in the form of a new license condition and an exemption from Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52, "Licenses, Certifications, and Approvals for Nuclear Power Plants" that requires NRC approval in order for the VEGP Units 3 and 4 licensee to depart from Tier 2\* information in the VEGP Units 3 and 4 updated final safety analysis report (UFSAR).

The requested amendment proposes new criteria that, if met, would allow the licensee to revise Tier 2\* information in the UFSAR without NRC approval.

The Structural Engineering Branch staff plans to conduct an audit at the VEGP Units 3 and 4 site to gain better understanding of certain construction details that, if changed, would result in changes to Tier 2\* information in the UFSAR and how these changes would be handled under the licensee's proposed license condition.

Docket Nos.: 52-025 and 52-026

Enclosure:  
Regulatory Audit Plan

cc: See next page

CONTACT: Donald Habib, NRO/DNRL/LB4  
301-415-1035

U.S. NUCLEAR REGULATORY COMMISSION AUDIT PLAN FOR VOGTLE ELECTRIC GENERATING PLANT UNITS 3 AND 4, REQUEST FOR LICENSE AMENDMENT AND EXEMPTION: CHANGES TO TIER 2\* DEPARTURE EVALUATION PROCESS (LAR 17-037)  
DATED: JUNE 12, 2018

**DISTRIBUTION:**

Public  
LB4 R/F  
RidsAcrsAcnwMailCenter  
RidsOgcMailCenter  
CPatel  
DHabib  
RButler  
JDixon-Herrity

**ADAMS Accession No.: ML18156A340**

**NRO-008**

OFFICE	DLSE/LB4/PM	DLSE/LB4/LA	DLSE/LB4/BC
NAME	DHabib	RButler	JDixon-Herrity
DATE	6/12/18	6/06/18	6/11/18

**OFFICIAL RECORD COPY**

Vogtle Units 3 & 4 Mailing List  
cc:

(Revised 03/13/2018)

Office of the Attorney General  
40 Capitol Square, SW  
Atlanta, GA 30334

Resident Inspector  
Vogtle Plant Units 3 & 4  
8805 River Road  
Waynesboro, GA 30830

Resident Manager  
Oglethorpe Power Corporation  
Alvin W. Vogtle Nuclear Plant  
7821 River Road  
Waynesboro, GA 30830

Mr. Barty Simonton  
Team Leader  
Environmental Radiation Program  
Air Protection Branch  
Environmental Protection Division  
4244 International Parkway, Suite 120  
Atlanta, GA 30354-3906

Southern Nuclear Operating Company  
Document Control Coordinator  
42 Inverness Center Parkway, Bin 237  
Birmingham, AL 35242

George B. Taylor, Jr.  
2100 East Exchange Pl  
Atlanta, GA 30084-5336

Anne F. Appleby  
Oglethorpe Power Corporation  
2100 East Exchange Place  
Tucker, GA 30084

Brian H. Whitley  
Regulatory Affairs Director  
Southern Nuclear Operating Company  
42 Inverness Center Parkway, BIN B237  
Birmingham, AL 35242

County Commissioner  
Office of the County Commissioner  
Burke County Commission  
Waynesboro, GA 30830

Mr. Michael Yox  
Site Regulatory Affairs Director  
Vogtle Units 3 & 4  
7825 River Road, Bin 63031  
Waynesboro, GA 30830

Mr. Wayne Guilfoyle  
Commissioner District 8  
Augusta-Richmond County Commission  
4940 Windsor Spring Rd  
Hephzibah, GA 30815

Gwendolyn Jackson  
Burke County Library  
130 Highway 24 South  
Waynesboro, GA 30830

Mr. Reece McAlister  
Executive Secretary  
Georgia Public Service Commission  
Atlanta, GA 30334

## Vogle Units 3 & 4 Mailing List

### Email

acchambe@southernco.com (Amy Chamberlian)  
agaughtm@southernco.com (Amy Aughtman)  
ALPUGH@southernco.com (Amanda Pugh)  
awc@nei.org (Anne W. Cottingham)  
becky@georgiawand.org (Becky Rafter)  
bhwhitley@southernco.com (Brian Whitley)  
Bill.Jacobs@gdsassociates.com (Bill Jacobs)  
bjadams@southernco.com (Brad Adams)  
bwwaites@southernco.com (Brandon Waites)  
castelca@westinghouse.com (Curtis Castell)  
comerj@westinghouse.com (James Comer)  
crpierce@southernco.com (C.R. Pierce)  
dahjones@southernco.com (David Jones)  
david.hinds@ge.com (David Hinds)  
david.lewis@pillsburylaw.com (David Lewis)  
dgbost@southernco.com (Danny Bost)  
dfulton@southernco.com (Dale Fulton)  
drculver@southernco.com (Randy Culver)  
durhamdc@westinghouse.com (David Durham)  
ed.burns@earthlink.net (Ed Burns)  
edavis@pegasusgroup.us (Ed David)  
erg-xl@cox.net (Eddie R. Grant)  
fdhundle@southernco.com (Forrest Hundley)  
fhwillis@southernco.com (Fred Willis)  
G2NDRMDC@southernco.com (SNC Document Control)  
graysw@westinghouse.com (Scott W. Gray)  
jadwilli@southernco.com (J.D. Williams)  
james1.beard@ge.com (James Beard)  
jannina.blanco@pillsburylaw.com (Jannina Blanco)  
jantol1dj@westinghouse.com (David Jantosik)  
jenmorri@southernco.com (Jennifer Buettner)  
JHaswell@southernco.com (Jeremiah Haswell)  
jim@ncwarn.org (Jim Warren)  
John.Bozga@nrc.gov (John Bozga)  
Joseph\_Hegner@dom.com (Joseph Hegner)  
jpredd@southernco.com (Jason R. Redd)  
jranalli@meagpower.org (Jerry Ranalli)  
karen.patterson@ttnus.com (Karen Patterson)  
karlg@att.net (Karl Gross)  
kmstacy@southernco.com (Kara Stacy)  
KSutton@morganlewis.com (Kathryn M. Sutton)

## Vogle Units 3 & 4 Mailing List

kwaugh@impact-net.org (Kenneth O. Waugh)  
lchandler@morganlewis.com (Lawrence J. Chandler)  
Marc.Pickering@hq.doe.gov (Marc Pickering)  
markus.popa@hq.doe.gov (Markus Popa)  
mdmeier@southernco.com (Mike Meier)  
media@nei.org (Scott Peterson)  
Melissa.Smith@Hq.Doe.Gov (Melissa Smith)  
Michael.Kuca@hq.doe.gov (Michael Kuca)  
mike.price@opc.com (M.W. Price)  
MKWASHIN@southernco.com (MKWashington)  
mlgraves@southernco.com (Michelle Graves)  
MSF@nei.org (Marvin Fertel)  
myox@southernco.com (Mike Yox)  
nirsnet@nirs.org (Michael Mariotte)  
Nuclaw@mindspring.com (Robert Temple)  
patriciaL.campbell@ge.com (Patricia L. Campbell)  
Paul@beyondnuclear.org (Paul Gunter)  
pbessette@morganlewis.com (Paul Bessette)  
r.joshi15@comcast.net (Ravi Joshi)  
RJB@NEI.org (Russell Bell)  
Ronald.Jones@scana.com (Ronald Jones)  
rwink@ameren.com (Roger Wink)  
sabinski@suddenlink.net (Steve A. Bennett)  
sara@cleanenergy.org (Sara Barczak)  
sblanton@balch.com (Stanford Blanton)  
Shiva.Granmayeh@hq.doe.gov (Shiva Granmayeh)  
sjackson@meagpower.org (Steven Jackson)  
skauffman@mpr.com (Storm Kauffman)  
sroetger@psc.state.ga.us (Steve Roetger)  
stephan.moen@ge.com (Stephan Moen)  
stephen.burdick@morganlewis.com (Stephen Burdick)  
tom.miller@hq.doe.gov (Tom Miller)  
TomClements329@cs.com (Tom Clements)  
Vanessa.quinn@dhs.gov (Vanessa Quinn)  
vcsummer2n3@gmail.com (Brian McIntyre)  
wasparkm@southernco.com (Wesley A. Sparkman)  
wayne.marquino@gmail.com (Wayne Marquino)  
weave1dw@westinghouse.com (Doug Weaver)  
x2gabeck@southernco.com (Gary Becker)  
x2kmseib@southernco.com (Kristin Seibert)

**AUDIT OF DRAWINGS AND CONSTRUCTION STRUCTURES IN SUPPORT OF REQUEST  
FOR LICENSE AMENDMENT RELATED TO CHANGES TO TIER 2\*  
DEPARTURE EVALUATION PROCESS (LAR 17-037)**

**SOUTHERN NUCLEAR OPERATING COMPANY  
VOGTLE ELECTRIC GENERATING PLANT, UNITS 3 AND 4  
Docket Nos. 52-025 and 52-026**

Location: Vogtle Electric Generating Plant Units 3 and 4 Plant Site, Vogtle Support Center  
7821 River Road  
Waynesboro, GA 30830

The purpose of the audit is to review the structural construction and supporting documents needed by staff to verify the information and conclusions in the "Request for License Amendment and Exemption: Changes to Tier 2\* Departure Process (LAR 17-037) submitted by Southern Nuclear Operating Company (SNC) for the Vogtle Electric Generating Plant (VEGP) Units 3 and 4, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17355A416).

**A. Background:**

In LAR-17-037, SNC proposes an exemption from Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52, "Licenses, Certifications, and Approvals for Nuclear Power Plants" that requires U.S. Nuclear Regulatory Commission (NRC) approval in order to depart from changes to Tier 2\* information in the VEGP Units 3 and 4 Updated Final Safety Analysis Report (UFSAR) and proposes certain criteria that, if met, would allow the VEGP Units 3 and 4 licensee to depart from Tier 2\* information without securing NRC approval.

In a draft response to a request for additional information, SNC proposed to revise one of its previously proposed criteria to account for possible future departures from Tier 2\* information in Chapter 3 of the UFSAR related to critical structures (ADAMS Accession Nos. ML18102B682 and ML18145A289).

The Office of New Reactors (NRO) Projects staff determined that an audit of the critical section structural construction information is an appropriate method to confirm how the proposed criteria adequately address possible changes to Tier 2\* information regarding critical sections in Chapter 3 of the UFSAR.

**B. Regulatory Audit Basis**

10 CFR Part 52, Appendix D, Section VIII.B.6.b and c describe how a licensee who references this appendix may not depart from Tier 2\* information without prior NRC approval.

The NRC staff will follow NRO Office Instruction NRO-REG-108 (Revision 0), "Regulatory Audits," (ADAMS Accession No. ML081910260) in performing the audit of the reports and calculations cited below.

Enclosure

### **C. Regulatory Audit Scope**

In LAR-17-037, SNC proposed several criteria, any one of which, if met by a proposed change to Tier 2\* information, would require NRC approval in order to be implemented. In a draft response to staff request for additional information (RAI) 17-037-2, SNC proposed a revised criterion to address changes in the demand-to-capacity ratios for structural reinforcement in critical sections. The purpose of the audit is for the staff to observe and understand the specific structural challenges to be addressed by this LAR.

### **D. Information and Other Material Necessary for the Regulatory Audit**

The audit will consist of a physical walkdown of example several structure specimens and a review of related detailed design and construction documents.

Other documents may be requested based on the staff's review of the above documents.

Appropriate handling and protection of proprietary information shall be acknowledged and observed throughout the audit.

### **E. Audit Team**

The following are the NRC audit team members:

Don Habib, Project Manager (NRC), Lead  
Sujit Samaddar, Structural Engineering Branch Chief  
Pravin Patel, Structural Engineering Technical Reviewer  
Vaughn Thomas, Structural Engineering Technical Reviewer

The following are the licensee contacts:

Jason Redd (SNC)  
Neil Haggerty (SNC)

### **F. Logistics**

The audit is planned to occur at the VEGP Units 3 and 4 construction site on June 7, 2018, beginning at the Vogtle Support Center located at 7821 River Road Waynesboro, GA 30830, and to finish on June 8, 2018, with a public meeting beginning at 10:00 a.m. at the Vogtle Support Center. The following schedule is planned:

- Arrive at Vogtle Support Center by Thursday, 7:45 a.m. Activities include badging, safety briefing, PPE, etc.
- Document review, tour of construction examples, and SNC presentation of specific construction issues to be addressed by LAR 17-037 (Start - 8:30 a.m.)
- Lunch
- Staff's review of revised draft response to RAI LAR-17-037-2, as assisted by work front tour and detailed documentation review – Thursday afternoon
- Audit closeout teleconference – Friday, 9:00 a.m.
- Public call – Discuss results of staff's review of draft RAI response, as assisted by previous day's tour and reviews (Friday, 10:00 a.m.).

**G. Special Requests**

If necessary, any circumstances arising during performance of the audit will be communicated between Don Habib (NRC) and an available SNC point of contact.

**H. Deliverables**

At the completion of the audit, the NRC staff will prepare an audit report that will be declared and entered as an official agency record in ADAMS in accordance with NRO Office Instruction NRO-REG-108.