

Vogle PEmails

From: Gleaves, Bill
Sent: Tuesday, June 12, 2018 8:02 AM
To: Vogle PEmails
Subject: FW: RE: LAR-17-024 Follow-up
Attachments: ND-18-XXXX_LAR-17-024S3_Draft.pdf

The purpose of this email is to enter the emails below and the draft Supplement for discussion, above, into ADAMS for public viewing.

From: Henderson, Ryan Donald [mailto:RDHENDER@SOUTHERNCO.COM]
Sent: Monday, June 11, 2018 9:27 AM
To: Gleaves, Bill <Bill.Gleaves@nrc.gov>
Cc: Haggerty, Neil <X2NHAGGE@SOUTHERNCO.COM>; Sparkman, Wesley A. <WASPARKM@southernco.com>; Aughtman, Amy G. <AGAUGHTM@SOUTHERNCO.COM>; Patel, Chandu <Chandu.Patel@nrc.gov>; Hoellman, Jordan <Jordan.Hoellman2@nrc.gov>
Subject: [External_Sender] RE: LAR-17-024 Follow-up

Billy,

See attached for draft letter we would like to discuss on Thursday. Please let me know if the staff will be able to support the discussion.

Thanks,

Ryan Henderson

Licensing
Office: 205-992-6426
Cell: 205-613-0342

From: Henderson, Ryan Donald
Sent: Thursday, June 07, 2018 5:45 PM
To: Gleaves, Bill <Bill.Gleaves@nrc.gov>
Cc: Haggerty, Neil <X2NHAGGE@SOUTHERNCO.COM>; Sparkman, Wesley A. <WASPARKM@southernco.com>; Aughtman, Amy G. <AGAUGHTM@SOUTHERNCO.COM>; chandu.patel@nrc.gov
Subject: LAR-17-024 Follow-up

Billy,

We would like to have a follow-up discussion regarding draft RAI #2 and #3 with the intent to show a change in direction for the LAR which will hopefully negate the need for the RAIs. The change in direction would be shown via a draft supplement that will hopefully be available to the staff tomorrow or Monday. We would like to have the staff available on Thursday (6/14) to discuss the draft supplement. Please let me know if this will be possible.

Thanks,

Ryan Henderson

Licensing
Office: 205-992-6426

Cell: 205-613-0342

Hearing Identifier: Vogtle_COL_Docs_Public
Email Number: 298

Mail Envelope Properties (BY1PR09MB0903E5DE4B01025B435CC4A29F7F0)

Subject: FW: RE: LAR-17-024 Follow-up
Sent Date: 6/12/2018 8:02:10 AM
Received Date: 6/12/2018 8:02:15 AM
From: Gleaves, Bill

Created By: Bill.Gleaves@nrc.gov

Recipients:
"Vogtle PEmails" <Vogtle.PEmails@nrc.gov>
Tracking Status: None

Post Office: BY1PR09MB0903.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	1869	6/12/2018 8:02:15 AM
ND-18-XXXX_LAR-17-024S3_Draft.pdf		184873

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

[DATE]Docket Nos.: 52-025
52-026**ND-18-XXXX**
10 CFR 50.90U.S. Nuclear Regulatory Commission
ATTN: 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:
Technical Specification Updates for Reactivity Controls
and other Miscellaneous Changes (LAR-17-024S3)**

Ladies and Gentlemen:

Pursuant to 10 CFR 52.98(c) and in accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC) previously 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). The requested amendment proposes to depart from approved COL Appendix A, Technical Specifications.

SNC originally submitted this request by SNC letter ND-17-1279, dated July 28, 2017 [ADAMS Accession No. ML17209A755] and supplemented by SNC letter ND-18-0058, dated January 23, 2018 [ADAMS Accession No. ML18023A440] and by SNC letter ND-18-0364, dated March 23, 2018 [ADAMS Accession No. ML18082B370].

Enclosures 1 through 3 were provided with the original License Amendment Request (LAR), Enclosures 4 and 5 were provided with the first LAR supplement, and Enclosures 6, 7, and 8 were provided with the second LAR supplement. Enclosure 9 provides a revised description of change and technical evaluation for Change L07 in the original LAR based upon discussions held with the NRC staff on May 31, 2018 and **June 14**, 2018.

Enclosure 10 provides the applicable revised markups depicting the requested change to the licensing basis documents requiring NRC staff approval.

Enclosure 11 provides the applicable revised conforming Technical Specifications Bases changes for information only.

The information provided in this LAR supplement does not expand the scope of the request, or alter the conclusions of the Significant Hazards Consideration Determination or Environmental Considerations submitted in LAR-17-024.

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

SNC now requests NRC staff approval of this license amendment by **one month from submittal** to support Operator training updates. Delayed approval of this license amendment could result in a delay in Operator training updates. SNC expects to implement the proposed amendment within thirty days of approval.

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 its enclosure to the designated State Official.

Should you have any questions, please contact Mr. Ryan Henderson at (205) 992-6426.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the **[Day]** of **[Month Year]**.

Respectfully submitted,

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

- Enclosures:
- 1) – 3) (previously submitted with the original LAR, LAR-17-024, in SNC letter ND-17-1279)
 - 4) – 5) (previously submitted as supplemental information with LAR-17-024S1 in SNC letter ND-18-0058)
 - 6) – 8) (previously submitted as supplemental information with LAR-17-024S2 in SNC letter ND-18-0364)
 - 9) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Supplement to Request for License Amendment: Technical Specification Updates for Reactivity Controls and other Miscellaneous Changes (LAR-17-024S3)
 - 10) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Supplement to Proposed Changes to Licensing Basis Documents (LAR-17-024S3)
 - 11) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Supplement to Conforming Technical Specifications Bases Changes (For Information Only) (LAR-17-024S3)

cc:

Admin: Use Distribution for three enclosures.

DRAFT

Southern Nuclear Operating Company

ND-18-XXXX

Enclosure 9

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

**Supplement to Request for License Amendment:
Technical Specification Updates for Reactivity Controls
and other Miscellaneous Changes (LAR-17-024S3)**

Insertions Denoted by Blue Underline and Deletions by ~~Red~~ Strikethrough

Omitted text is identified by three asterisks (* * *)

(This Enclosure consists of 3 pages, including this cover page)

Vogtle Electric Generating Plant (VEGP) Units 3 and 4 submitted License Amendment Request LAR-17-024 via Southern Nuclear Operating Company (SNC) letter ND-17-1279 on July 28, 2017. The portion of the LAR identified as change “L07” on Page 11 of 39 and Page 34 of 39 of Enclosure 1 proposed a change to Technical Specification (TS) Table 3.3.5-1. This change included:

1. Change the Table 3.3.5-1 Function 1, Manual Reactor Trip Required Channels from “2” to “2 switches.”
2. Change the Table 3.3.5-1 Function 2, Safeguards Actuation Input from Engineering Safety Feature Actuation System – Manual Required Channels from “2” to “2 switches.”
3. Change the Table 3.3.5-1 Function 4, Core Makeup Tank Actuation Input from Engineered Safety Feature Actuation System – Manual Required Channels from “2 switch sets” to “2 switches.”

Based on discussion with the NRC staff in the public meetings on May 31, 2018 and June 14, 2018, SNC is withdrawing the proposed changes to Function 1 and Function 2 and is proposing to revise the change to Function 4 in order to improve the presentation of the requirement. There are no changes to the design or operation of the functions. The updated proposed change continues to reflect an editorial presentation preference only.

The revision to the original LAR reflects an improvement to the LAR and does not expand the scope of the request, or alter the conclusions of the Significant Hazards Consideration Determination or Environmental Considerations submitted in LAR-17-024.

Revise Page 11 of 39 of Enclosure 1 to ND-17-1279 as indicated below:

L07	Detailed Description
3.3.5-3	1. Change the Table 3.3.5-1 Function 1, Manual Reactor Trip Required Channels from “2” to “2 switches.”
LR	2. Change the Table 3.3.5-1, Function 2, Safeguards Actuation Input from Engineered Safety Feature Actuation System – Manual Required Channels from “2” to “2 switches.”
	3. Change the Table 3.3.5-1, Function 4, Core Makeup Tank Actuation Input from Engineered Safety Feature Actuation System – Manual Required Channels from to “2 switch sets” to “2 switches.”

Technical Evaluation

A manual actuation “switch set” refers to a pair of redundant switches on the Primary Dedicated Safety Panel (PDSP), and for some protective functions, one switch on the Secondary Dedicated Safety Panel (SDSP). The second set of redundant switches is located on the SDSP for the actuation of all safety functions that cause the operation of components with onerous consequences. In order to initiate the protective function of switch sets that have both a PDSP switch and associated SDSP switch, they must be actuated simultaneously. For Reactor Trip and Engineered Safety Features

Actuation System (ESFAS) functions with manual actuation switches located only on the PDSP, the term “switch set” does not apply.

Table 3.3.5-1, ~~Functions 1 and 2 states 2 channels, and~~ Function 4, states “2 switch sets” for the manual actuation reactor trip function under the Required Channels column. The Protection and Safety Monitoring System (PMS) design of the manual actuation reactor trip provides two redundant ~~switches~~ controls on the PDSP, with no corresponding ~~switches~~ controls on the SDSP. This is consistent with the description of the manual actuation of Function 4 in UFSAR Subsection 7.2.1.1.8 and Figure 7.2-1 Sheet 12. For this configuration, the term “switch set” does not reflect the design. Operation of either control will result in a CMT actuation signal and also results in a reactor trip signal. ~~For this configuration, the term “switches” for Functions 1, 2 and 4, manual reactor trip is applicable for this proposed change.~~ There is no change in manual actuation reactor trip functions with ~~these~~ this changes, or any change in PMS function. The proposed changes to the Reactor Trip and ESFAS manual actuation is being made for consistency with the design.

Revise the description of change L07 on Page 34 of 39 to match the above discussion as follows:

* * *

- L07** SNC proposes to amend TS, Section 3.3.5, "Reactor Trip System Manual Actuation," Table 3.3.5-1 "Reactor Trip System Manual Actuation," ~~Functions 1. Manual Reactor Trip, 2. Safeguards Actuation Input from Engineered Safety Feature Actuation System – Manual and 4. Core Makeup Tank Actuation Input from Engineered Safety Feature Actuation System – Manual for Required Channels to 2~~ (delete “switch sets” switches.

* * *

Southern Nuclear Operating Company

ND-18-XXXX

Enclosure 10

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

Supplement to Proposed Changes to Licensing Basis Documents

(LAR-17-024S3)

Insertions Denoted by Blue Underline and Deletions by ~~Red~~ Strikethrough

Omitted text is identified by three asterisks (* * *)

Withdrawal of added text Denoted by ~~Blue~~ Strikethrough with Yellow Highlight

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

ND-18-XXXX
 Enclosure 10
 Supplement to Proposed Changes to Licensing Basis Documents (LAR-17-024S3)

On Page 8 of 9 of Enclosure 2 of SNC letter ND-17-1279, replace change L07 with the following:

Revised COL Appendix A (Technical Specifications), TS 3.3.5, RTS Manual Actuation, as follows (L07):

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS
1. Manual Reactor Trip	* * *	2 switches
2. Safeguards Actuation Input from Engineered Safety Feature Actuation System – Manual	* * *	2 switches
3. ADS Stages 1, 2, and 3 Actuation Input from Engineered Safety Feature Actuation System – Manual	* * *	2 switch sets
4. Core Makeup Tank Actuation Input from Engineered Safety Feature Actuation System – Manual	* * *	2 switches switch-sets

Southern Nuclear Operating Company

ND-18-XXXX

Enclosure 11

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

Supplement to Conforming Technical Specifications Bases Changes

(For Information Only)

(LAR-17-024S3)

Insertions Denoted by Blue Underline and Deletions by ~~Red~~ Strikethrough

Omitted text is identified by three asterisks (* * *)

Withdrawal of inserted text Denoted by ~~Blue~~ Strikethrough with Yellow Highlight

Withdrawal of change to existing text Denoted by ~~Black~~ with Yellow Highlight

(This Enclosure consists of 3 pages, including this cover page)

ND-18-XXXX

Enclosure 11

Supplement to Conforming Technical Specifications Bases Changes (For Information Only)
(LAR-17-024S3)

On Page 10 of 12 and 11 of 12 of Enclosure 3 to SNC letter ND-17-1279, replace change L07 with the following:

Revised Technical Specification Bases, Section B 3.3.5, RTS Manual Actuation, as follows (L07):

APPLICABLE

* * *

SAFETY

ANALYSES, LCOs,
and APPLICABILITY

1. Manual Reactor Trip

* * *

The LCO requires two Manual Reactor Trip actuation **channelswitches** to be OPERABLE in MODES 1 and 2, and in MODES 3, 4, and 5 when the Plant Control System (PLS) is capable of rod withdrawal, or one or more rods are not fully inserted. Two independent actuation **channelswitches** are required to be OPERABLE so that no single random failure will disable the Manual Reactor Trip Function.

* * *

2. Safeguards Actuation Input from Engineered Safety Feature Actuation System – Manual

* * *

The LCO requires two manual **channelswitches** of Safeguards Actuation Input from ESFAS to be OPERABLE in MODES 1 and 2.

* * *

4. Core Makeup Tank (CMT) Actuation Input from Engineered Safety Feature Actuation System – Manual

* * *

The LCO requires two manual actuation ~~switch sets~~ ~~switches~~ channels for the CMT Actuation Input from Engineered Safety Feature Actuation System to be OPERABLE. Two OPERABLE manual actuation ~~switch sets~~ ~~switches~~ channels are provided to ensure that random failure of a single logic channel will not prevent reactor trip.

* * *