

June 21, 2018

Docket Nos.: 52-025  
52-026

ND-18-0852  
10 CFR 50.90

U.S. Nuclear Regulatory Commission  
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:  
Change to Battery Charger Output Amp Value in Technical Specification  
SR 3.8.1.2 and the Surveillance Frequency for SR 3.8.7.6 (LAR-18-003S2)

Ladies and Gentlemen:

Pursuant to 10 CFR 52.98(c) and in accordance with 10 CFR 50.90, 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-18-0025, dated January 31, 2018 [ADAMS Accession Number ML18031B181], and supplemented by letter ND-18-0571, dated April 25, 2018 [ADAMS Accession Number ML18115A309], which addressed a Request for Additional Information (RAI) from the NRC Staff, transmitted by electronic mail (email) on March 30, 2018 [ADAMS Accession Number ML18089A140].

The requested amendment proposed to depart from approved COL Appendix A, Technical Specifications. The proposed changes would revise COL Appendix A, Surveillance Requirement (SR) 3.8.1.2, to identify that the required minimum ampere output for the battery chargers is 150 amps. Additionally, the proposed changes would revise COL Appendix A SR 3.8.7.6 to align the test frequency with the expected life of the AP1000 Class 1E batteries.

Enclosure 5 to this letter summarizes AP1000 Class 1E battery testing plans for VEGP Units 3 and 4, as discussed on the May 10, 2018 NRC public call [ADAMS Accession Number ML18142B987] regarding the review of SNC License Amendment Request (LAR) 18-003, submitted by SNC letter ND-18-0025. This written summary is being provided at the request of the NRC staff.

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-18-0025 and Enclosure 4 of letter ND-18-0571.

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

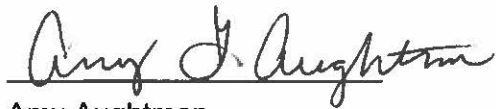
SNC requests staff approval of the license amendment by July 31, 2018 to support Operator training updates. Delayed approval of this license amendment could result in a delay in Operator training updates and subsequent dependent construction activities. SNC expects to implement the proposed amendment within 30 days of approval of the requested changes.

In accordance with 10 CFR 50.91, SNC is notifying the State of Georgia of this LAR Supplement by transmitting a copy of this letter and enclosures to the designated State Official.

Should you have any questions, please contact Mr. Wesley A. Sparkman at (205) 992-5061.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 21<sup>st</sup> of June 2018.

Respectfully submitted,



Amy Aughtman  
Director, Licensing  
Southern Nuclear Operating Company

- Enclosures: 1 – 3) (previously submitted with the original LAR, LAR-18-003, in SNC letter ND-18-0025)
- 4) (previously submitted with LAR-18-003S1 in SNC letter ND-18-0571)
- 5) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Summary of Class 1E Battery Testing Plans Discussed on the May 10, 2018 NRC Public Call Regarding LAR 18-003 (LAR-18-003S2)

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**Southern Nuclear Operating Company**

**ND-18-0852**

**Enclosure 5**

**Vogtle Electric Generating Plant (VEGP) Units 3 and 4**

**Summary of Class 1E Battery Testing Plans Discussed on the  
May 10, 2018 NRC Public Call Regarding LAR 18-003  
(LAR-18-003S2)**

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

ND-18-0852  
Enclosure 5  
Summary of Class 1E Battery Testing Plans Discussed on the  
May 10, 2018 NRC Public Call Regarding LAR 18-003 (LAR-18-003S2)

The below information summarizes AP1000 Class 1E battery testing plans for Vogtle 3 and 4, as discussed on the May 10, 2018 NRC public call [ADAMS Accession Number ML18142B987] regarding the review of Southern Nuclear Operating Company (SNC) License Amendment Request (LAR) 18-003, submitted by SNC letter ND-18-0025, dated January 31, 2018 [ADAMS Accession Number ML18031B181]. The discussion included a clarification of battery testing plans as described by SNC letter ND-18-0571, dated April 25, 2018 [ADAMS Accession number ML18115A309], which addressed a Request for Additional Information (RAI) from the NRC Staff, transmitted by electronic mail (email) on March 30, 2018 [ADAMS Accession Number ML18089A140]. As noted in the RAI response included in SNC letter ND-18-0571, UFSAR Appendix 1A clearly identifies an exception is taken to RG 1.129, Rev. 2, and that IEEE 450-1995 was utilized to develop the Technical Specifications content and frequency in lieu of IEEE 450-2002. IEEE 450-1995, to which SNC is committed, does not include guidance for use of the same type of modified performance test throughout battery life for best trending results.

This brief written summary of the public call discussion is provided at the request of the NRC staff.

#### **A Summary of Planned AP1000 Class 1E Battery Testing Plans for Vogtle 3 and 4:**

Vogtle 3 and 4 intends to comply with the associated Technical Specifications (TS) Surveillance Requirements (SRs) related to the AP1000 Class 1E Batteries as follows:

##### **SR 3.8.1.3:**

SNC intends to verify battery capacity is adequate to supply, and maintain in operable status, the required emergency loads for the design duty cycle when subjected to a modified performance discharge test. [SNC plans to utilize the option allowed in the Note to SR 3.8.1.3].

This test will be performed at the 24 month frequency specified in the TS SR.

##### **SR 3.8.7.6:**

SNC intends to verify battery capacity is  $\geq 80\%$  of the manufacturer's rating by using the modified performance discharge test option allowed in the SR. Since SR 3.8.1.3 is performing the identical test, SNC will continue the same frequency of 24 months unless battery degradation requires the frequency of the testing to increase as specified in the SR.

In an effort to obtain the best data possible for trending purposes, SNC plans to perform the same test, a modified performance discharge test, for the entire life cycle of each battery subject to these SRs.