

June 25, 2018

Docket Nos.: 52-025
52-026

ND-18-0908
10 CFR 50.90

U.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:
Changes to Construction Fitness-for-Duty (FFD) Commitments (LAR-18-018S1)**

Ladies and Gentlemen:

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-18-0754, dated June 15, 2018 [ADAMS Accession Number ML18166A347], to revise commitments related to the construction fitness-for-duty (FFD) program described in the VEGP 3 and 4 Updated Final Safety Analysis Report (UFSAR). The change involves the creation of a new type of FFD Authorization (FFDA) that would allow construction workers temporary access to the construction site pending completion of all pre-access FFD requirements but prior to assignment to work on safety- or security-related structures, systems, and components (SSCs).

In a teleconference held on June 20, 2018, the NRC requested SNC to provide additional clarification concerning the basis for concluding that the proposed changes do not have an adverse impact on safety and security as provided in Enclosure 1 of ND-18-0754.

Enclosures 1 and 2 were provided with the original LAR-18-018, SNC letter ND-18-0754.

Enclosure 3 provides the requested clarification to the FFD performance objectives reference.

The information provided in this License Amendment Request (LAR) supplement does not impact the scope, technical content, or conclusions of the Significant Hazards Consideration Determination, the Environmental Considerations, or markups to the licensing basis documents of the original LAR-18-018 provided in Enclosures 1 and 2 of SNC letter ND-18-0754.

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

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

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 25th of June 2018.

Respectfully submitted,



Wesley A. Sparkman
Licensing Manager
Southern Nuclear Operating Company

Enclosures 1 and 2) Previously submitted with the original LAR, LAR-18-018
 3) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 –
 Supplement to Request for License Amendment Regarding
 Changes to Construction Fitness-for-Duty (FFD) Commitments
 (LAR-18-018S1)

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Enclosure 3

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

**Supplement to Request for License Amendment Regarding
Changes to Construction Fitness-for-Duty (FFD) Commitments
(LAR-18-018S1)**

Insertions Denoted by Blue Underline

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

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

ND-18-0908

Enclosure 3

Supplement to Request for License Amendment Regarding Changes to Construction Fitness-for-Duty (FFD) Commitments (LAR-18-018S1)

In a teleconference held on June 20, 2018, the NRC requested Southern Nuclear Operating Company (SNC) to provide additional clarification concerning the basis for concluding that the proposed changes described in SNC letter ND-18-0754, regarding a license amendment request to take exception to construction fitness-for-duty commitments, do not have an adverse impact on safety and security. Specifically, SNC was requested to provide additional detail related to how the various barriers and compensatory measures described and proposed in the LAR provide a clear basis for concluding that safety and security are not adversely impacted. To address this observation, the technical evaluation provided in Enclosure 1 is revised as described below:

Add the following paragraph between the third and fourth paragraphs on page 10 of 15 of Enclosure 1 as follows:

* * *

Should PDI become known after the worker had completed assigned work on non safety- or non security-related SSCs, the event would be entered into the site Corrective Action Program (CAP), evaluated, and a determination made to required corrective actions. In addition, as required by implementing procedures, necessary entries would be made into the Personnel Access Data System (PADS).

The proposed changes will have no significant adverse impacts on safety and security, because of the defense-in-depth measures SNC has implemented described above. These measures include the use of dedicated individuals to perform and monitor work in the field, the use of fully vetted workers for the construction of safety- and security-related SSCs, and verification of the quality of work in accordance with SNC's quality assurance program. Verification that safety- and security-related SSCs have been constructed in accordance with the design is provided through inspections, tests, analyses, and acceptance criteria (ITAAC). In addition, verification that safety- and security-related SSCs will perform their intended function will be provided during pre-operational and start-up testing.

The proposed changes do not affect the radiological source terms (i.e., amounts and types of radioactive materials released, their release rates and release durations) used in the accident analyses. The proposed changes do not affect safety-related equipment or a fission product barrier. No system or design function or equipment qualification is adversely affected by the proposed changes. The changes do not result in a new failure mode, malfunction or sequence of events that could adversely affect a radioactive material barrier or safety-related equipment. The proposed changes do not allow for a new fission product release path, result in a new fission product barrier failure mode, or create a new sequence of events that would result in significant fuel cladding failures.

* * *