

# DRAFT

## Request for Additional Information #04

### Vogle 3 & 4 LAR-17-024

#### “Technical Specification Updates for Reactivity Controls and other Miscellaneous Changes”

Issue Date: July 11, 2018

Operating Company: Southern Nuclear Operating Co.

Docket No. 52-025 and 52-026

Application Section: Technical Specifications

This request for additional information relates to Southern Nuclear Operating Company (SNC)'s application for license amendment request (LAR) 17-024, titled, “Technical Specification Updates for Reactivity Controls and other Miscellaneous Changes,” dated July 28, 2017 (ML17209A755) as supplemented January 23, March 23, and June 21, 2018 (ML17209A755, ML18082B370, and ML18172A154, respectively). By this request, the staff is informing SNC that it requires additional information in order to complete its review.

#### Question

Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.90, “Application for amendment of license, construction permit or early site permit,” requires, in part, that a license amendment fully describe the changes desired. In addition, 10 CFR 50.36, “Technical Specifications,” sets forth requirements for technical specifications to be included as part of the operating license for a nuclear power facility. However, the information within the technical evaluation presented in Item L07 of LAR-17-024 is insufficient for the staff to reach a conclusion on the application. The information contained in the technical evaluation appears to be inconsistent with the previously docketed material submitted by SNC. Given a lack of sufficient information in LAR-17-024, staff considered previously docketed material, and seeks clarification of the licensee’s request related to Item L07.

For example, for Function 4 of Technical Specification (TS) Table 3.3.5-1, LAR 17-024 proposes to change the language in the “REQUIRED CHANNELS” column from “2 switch sets,” to “2.” However, the technical evaluation first indicates that there are two sets of redundant switches, one on the Primary Dedicated Safety Panel (PDSP) and one on the Secondary Dedicated Safety Panel (SDSP). Then, in the second paragraph, the applicant indicates that the Protection and Safety Monitoring System design provides two redundant controls on the PDSP, with no corresponding controls on the SPDS. In the case of L07, the staff understands there to be two redundant switches located on the PDSP for Function 4, such that, when either is operated this will cause Function 4 to actuate.

The staff requests that SNC provide additional information that clarifies the licensee’s request regarding Function 4 stated above. The staff specifically seeks clarity on the operation of the “Reactor Trip System Manual Actuation” function via the “Core Makeup Tank Actuation Input from Engineered Safety Feature Actuation System - Manual” function (Function 4 in TS Table 3.3.5-1).