

Vogle PEmails

From: Haggerty, Neil <X2NHAGGE@SOUTHERNCO.COM>
Sent: Wednesday, September 5, 2018 3:58 PM
To: Hoellman, Jordan; Agee, Stephanie Y.
Cc: Habib, Donald; Sparkman, Wesley A.
Subject: [External_Sender] RE: 9/6 Public Meeting Document - SNC email detailing omitted text in License Condition
Attachments: 2018-09-06_LAR-17-037S6_ND-18-1180_Proposed LC text changes.pdf

Jordan,

Attached are the 3 emails identifying the 4 comments regarding the Proposed License Condition in LAR-17-037. I have also attached a mark-up of the proposed LC that we can use to lead us through this call. I think we will be concentrating on items #2 and #3, as we do not have any comments/questions on #1 or #4.

Thank you,
Neil Haggerty

Neil Haggerty | Southern Nuclear Operating Company

Nuclear Development Regulatory Affairs – VEGP 3&4 Licensing
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From: Hoellman, Jordan
Sent: Wednesday, September 05, 2018 2:33 PM
To: Agee, Stephanie Y.
Cc: Haggerty, Neil ; Habib, Donald
Subject: 9/6 Public Meeting Document - SNC email detailing omitted text in License Condition

Hi Stephanie –

Here's the document we discussed on the phone, where Neil describes the omitted text in the License Condition.

Thanks,
Jordan

Jordan Hoellman
Project Manager
Licensing Branch 4
Division of Licensing, Siting, and Environmental Analysis
Office of New Reactors

U.S. Nuclear Regulatory Commission
office: OWFN 08-C18
phone: (301) 415-5481
email: Jordan.Hoellman2@nrc.gov

Hearing Identifier: Vogtle_COL_Docs_Public
Email Number: 359

Mail Envelope Properties (22CCC8EC7A80FC4189AACACBEBBCAC5162D0AAD99)

Subject: [External_Sender] RE: 9/6 Public Meeting Document - SNC email detailing omitted text in License Condition
Sent Date: 9/5/2018 3:58:26 PM
Received Date: 9/5/2018 3:59:12 PM
From: Haggerty, Neil

Created By: X2NHAGGE@SOUTHERNCO.COM

Recipients:

"Habib, Donald" <Donald.Habib@nrc.gov>
Tracking Status: None
"Sparkman, Wesley A." <WASPARKM@southernco.com>
Tracking Status: None
"Hoellman, Jordan" <Jordan.Hoellman2@nrc.gov>
Tracking Status: None
"Agee, Stephanie Y." <SYAGEE@southernco.com>
Tracking Status: None

Post Office: ALXAPEX242.southernco.com

Files	Size	Date & Time
MESSAGE	1741	9/5/2018 3:59:12 PM
2018-09-06_LAR-17-037S6_ND-18-1180_Proposed LC text changes.pdf		
2530140		

Options

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

Haggerty, Neil

From: Haggerty, Neil
Sent: Wednesday, August 29, 2018 12:20 PM
To: Don Habib (Donald.Habib@NRC.gov)
Cc: Aughtman, Amy G.; Sparkman, Wesley A.; Amundson, Theodore Edwin
Subject: Omission of text from proposed license condition 2.D.(13)(a) in SNC Letter ND-18-1006, Enclosure 3U

Don,

As we discussed, I recently identified some words that were missing from proposed License Condition 2.D.(13)(a) in SNC letter ND-18-1006, Enclosure 3U, Updated Proposed Changes to Licensing Basis Documents.

Proposed License Condition 2.D.(13)(a) introduces the qualifying criteria for the use of the Tier 2 change process on departures from Tier 2* material. However, it was identified that we inadvertently omitted a portion of the B.5.a criteria for “changes to Tier 2 information that involve departures from Tier 2* information.”

The wording provided by NRC on 8/2/18 for License Condition (13)(a) says:

- (a) SNC is exempt from the requirements of 10 CFR Part 52, Appendix D, Paragraphs VIII.B.6 and VIII.B.5.a for prior NRC approval of departures from Tier 2* information **and departures from Tier 2 information** involving a change to or departure from Tier 2* information, *except* for proposed departures that:

However, the wording we included in ND-18-1006, Enclosure 3U left out the highlighted phrase for the proposed LC:

- (a) SNC is exempt from the requirements of 10 CFR Part 52, Appendix D, Paragraphs VIII.B.6 and VIII.B.5.a for prior NRC approval of departures from Tier 2* information involving a change to or departure from Tier 2* information; *except* for departures that:

#1

Also, since the Temporary clean pages were developed from the text in ND-18-1006, Enclosure 3U, this wording is also missing in the clean pages provided to Jordan on 8/23.

Thank you,

Neil Haggerty

Neil Haggerty | Southern Nuclear Operating Company

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Haggerty, Neil

From: Habib, Donald <Donald.Habib@nrc.gov>
Sent: Friday, August 31, 2018 7:19 AM
To: Haggerty, Neil; Sparkman, Wesley A.; Redd, Jason P.; Aughtman, Amy G.; Chamberlain, Amy Christine
Cc: Vogtle PEmails; Samaddar, Sujit; Patel, Pravin; Thomas, Vaughn; Ponko, Anthony; Dixon-Herrity, Jennifer; Lupold, Timothy; Hansing, Nicholas
Subject: LAR 17-037 Proposed Change to License Condition Criteria No. 1

Categories: This email has been sent from an external address. Please use caution when clicking on links or opening attachments.

To all:

The staff proposes for discussion the following edit to Criterion No. 1:

#2

Involve ~~design methodology or construction materials that deviate~~ a deviation from a code or standard credited in the plant-specific DCD for establishing the criteria for the design or construction of a structure, system, or component (SSC) important to safety,

Please let me know if you wish to discuss in a public meeting.

Thanks

Don Habib
Project Manager
NRO/DLSE, Licensing Branch 4
O-8D13
301-415-1035

Haggerty, Neil

From: Habib, Donald <Donald.Habib@nrc.gov>
Sent: Wednesday, September 05, 2018 9:47 AM
To: Haggerty, Neil; Sparkman, Wesley A.; Redd, Jason P.; Aughtman, Amy G.; Chamberlain, Amy Christine; Agee, Stephanie Y.
Cc: Vogtle PEmails; Samaddar, Sujit; Patel, Pravin; Thomas, Vaughn; Ponko, Anthony; Dixon-Herrity, Jennifer; Lupold, Timothy; Hansing, Nicholas; Hoellman, Jordan; Weisman, Robert
Subject: LAR 17-037 Proposed Changes to License Condition
Categories: This email has been sent from an external address. Please use caution when clicking on links or opening attachments.

To all:

For SNC's proposed license condition 2.D.(13) under LAR 17-037, the staff proposes for discussion the following two edits:

- #3** 1. In paragraphs (13), (13)(a)(1), (13)(a)(2), (13)(a)(7), and (13)(b)(1), change "plant-specific DCD" to "UFSAR"
2. Revise paragraph (13)(b) to the following wording:

#4 For a departure from Tier 2* information that does not require prior NRC approval under the exemption in License Condition 2.D.(13)(a), SNC may take the departure provided that SNC complies with the requirements for Tier 2 departures in 10 CFR Part 52, Appendix D, Paragraph VIII.B.5, as modified by the exemption in License Condition 2.D.(13)(a). For each departure authorized by this License Condition:

Please let me know if you wish to discuss in a public teleconference on September 6.

Thanks

Don Habib
Project Manager
NRO/DLSE, Licensing Branch 4
O-8D13
301-415-1035

Revise Combined License (COL) License Condition 2.D, by adding new condition (13), to address the Tier 2* Change Process, as follows:

D. The license is subject to, and SNC shall comply with, the conditions specified and incorporated below:

#1

* * *

and departures from Tier 2 information

(13) Departures from Plant-specific DCD Tier 2* Information

(a) SNC is exempt from the requirements of 10 CFR Part 52, Appendix D, Paragraphs VIII.B.6 and VIII.B.5.a for prior NRC approval of departures from Tier 2* information involving a change to or departure from Tier 2* information; except for departures that:

a deviation

#2

1. Involve ~~design methodology or construction materials that deviate~~ from a code or standard credited in the plant-specific DCD for establishing the criteria for the design or construction of a structure, system, or component (SSC) important to safety.
2. Result in a change to a design process described in the plant-specific DCD that is material to implementation of an industry standard or endorsed regulatory guidance.
3.
 - (i) Result in a change to the fuel criteria evaluation process, the fuel principal design requirements, or the nuclear design of the fuel or the reactivity control system that is material to a fuel or reactivity control system design function, or the evaluation methods in WCAP-12488, "Westinghouse Fuel Criteria Evaluation Process," or
 - (ii) Result in any change to the maximum fuel rod average burn-up limits or the small break LOCA analysis methodology described in UFSAR Subsections 15.6.5.4B.2.2 or 15.6.5.4B.2.3.
4. Adversely affect the containment debris limits or debris screen design criteria.
5. Change the Reactor Coolant Pump (RCP) type from a canned motor to a different type of RCP.
6. Result in a change to the Passive Residual Heat Removal Heat Exchanger natural circulation test (first plant test), the Core Makeup Tank Heated Recirculation Tests (first three plants test), or the Automatic Depressurization System Blowdown Test (first three plants test) that is material to the test objectives or test performance criteria.
7. Involve structural materials or analytical or design methods, including design codes and analytical assumptions, that deviate from those credited in the plant-specific DCD for critical sections.
8. Result in a change to the design of the steel faceplates, internal trusses, tie bars, or headed studs of the steel-concrete (SC) module walls in the

#3 is represented by yellow (plant-specific DCD) and orange (UFSAR) highlighted text. To be discussed in Public meeting.

Nuclear Island or the Shield Building, including SC-to-reinforced concrete (RC) connections,

9. Result in an increase in the demand to capacity (D/C) ratio of a critical section of the structure. SNC shall determine the D/C ratio under this condition for each critical section structural member including, but not limited to, wall segments, wall sections, concrete panels, slabs, or basemat sections, affected by a departure by:

(i) Using the Tier 2* information in the UFSAR Section 3.8 or Appendix 3H table that directly states the D/C ratio or states the area of steel provided and the area of steel required for the affected structural member, or

(ii) Providing the same total area of steel across the entire critical section using any combination of rebar sizes and spacing allowed by the design basis codes used in the UFSAR as the total area of steel specified in UFSAR Section 3.8 and Appendix 3H tables marked Tier 2*;

#4 (b) For a departure from Tier 2* information that does not require prior NRC approval under the exemption in License Condition 2.D.(13)(a), SNC may take the departure ~~under and in compliance with the Tier 2 change processes~~ in 10 CFR Part 52, Appendix D, Paragraph VIII.B.5, as modified by the exemption in License Condition 2.D.(13)(a). For each departure authorized by this License Condition: provided that SNC complies with the requirements for Tier 2 departures

1. The departure or change to Tier 2* information shall remain Tier 2* information in the plant-specific DCD.

2. SNC shall prepare and maintain a written evaluation that provides the bases for its determinations regarding the criteria in License Condition 2.D.(13)(a). In the report that 10 CFR Part 52, Appendix D, Section X.B.1 requires SNC to submit, SNC shall include a brief description of each departure and a summary of the evaluation of the departure.