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October 26, 2018

MEMORANDUM TO: File

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

SUBJECT: VOGTLE ELECTRIC GENERATING PLANT, UNITS 3 AND 4 –
NO SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS AND
CATEGORICAL EXCLUSION RE: REQUEST FOR EXEMPTION
FROM TIMING OF PRA STANDARDS (EPID L-2018-LLE-0009)

By letter dated June 27, 2018 (Agencywide Documents Access and Management System Accession No. ML18178A533), Southern Nuclear Operating Company (SNC) requested an exemption from Section 50.71(h)(1) of Title 10 of the *Code of Federal Regulations* (10 CFR). Specifically, the requested exemption would modify the timing requirement for the initial probabilistic risk assessment (PRA) to cover those initiating events and modes for which NRC-endorsed consensus standards on PRA exist one year prior to the scheduled date for initial loading of fuel. Currently, Regulatory Guide (RG) 1.200, Rev. 2, provides the currently applicable endorsements of PRA standards, and the requested exemption would permit SNC in its initial PRA to cover the initiating events and modes for which RG 1.200, Rev. 2 endorses standards even if a new revision of RG 1.200 is published greater than 1 year prior to the scheduled date for initial fuel load. The U.S. Nuclear Regulatory Commission (NRC) staff has completed its review of the requested exemption and is processing it for issuance. Meanwhile, the NRC staff has evaluated the proposed exemption against the standard set forth in 10 CFR 51.22, and has determined that the requested exemption meets the provisions of categorical exclusion 10 CFR 51.22(c)(25); the NRC staff's evaluation is set forth below.

No Significant Hazards Consideration (NSHC) Analysis

As described below, the NRC staff has used the NSHC standard provided by 10 CFR 50.92(c) to evaluate the subject exemption request:

- (1) Does the requested exemption involve a significant increase in the probability or consequences of an accident previously evaluated?

No. The proposed exemption from the requirements of 10 CFR 50.71(h)(1) would allow SNC to develop the initial level 1 and level 2 PRA to cover those initiating events and modes for which RG 1.200, Rev. 2, endorses standards. The requested exemption does not alter the design, function, or operation of any plant equipment.

Therefore, granting this exemption would not involve a significant increase in the probability or consequences of an accident previously evaluated.

- (2) Does the requested exemption create the possibility of a new or different kind of accident from any accident previously evaluated?

No. The requested exemption does not alter the design, function, or operation of any plant equipment. The requested exemption does not create any new failure mechanisms, malfunctions, or accident initiators.

Therefore, granting this exemption does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- (3) Does the requested exemption involve a significant reduction in a margin of safety?

No. A PRA is an analysis to determine the relative risk (probability) of an undesirable outcome, specifically, core damage frequency and large early release frequency. While the PRA uses the design attributes of structures, systems, and components (SSCs), the PRA does not affect SSCs. As a result, a change to the PRA description or PRA results does not affect an SSC, SSC design function, or method of performing or controlling a design function. While the PRA uses the design attributes of SSCs, the PRA is not used to establish the design bases of an SSC nor is it used in the safety analyses. Furthermore, the requested exemption does not exceed or alter a design basis or safety limit.

Therefore, granting this exemption does not involve a significant reduction in a margin of safety.

As all of the responses to the above questions are in the negative, the NRC staff has determined that the requested exemption involves NSHC.

Categorical Exclusion

There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite; there is no significant increase in individual or cumulative public or occupational radiation exposure; there is no significant construction impact; there is no significant increase in the potential for or consequences from radiological accidents; and the requirements from which an exemption is sought involve (A) recordkeeping requirements, (B) reporting requirements, (C) inspection or surveillance requirements, (D) equipment servicing or maintenance scheduling requirements, (E) education, training, experience, qualification, requalification or other employment suitability requirements, (F) safeguard plans, and materials control and accounting inventory scheduling requirements, (G) scheduling requirements, (H) surety, insurance or indemnity requirements, or (I) other requirements of an administrative, managerial, or organizational nature.

The requested exemption does not alter the design, function, or operation of any plant equipment. There are no changes to effluent types, plant radiological or non-radiological effluent release quantities, any effluent release path, or the functionality of any design or operational features credited with controlling the release of effluents during plant operation or construction. Therefore, the NRC staff concludes that the proposed exemption does not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

There are no changes to plant radiation zones and no changes to controls required under 10 CFR Part 20, which preclude a significant increase in occupational radiation exposure. Therefore, the NRC staff concludes that the proposed exemption does not involve a significant increase in individual or cumulative public or occupational radiation exposure.

The requested exemption does not alter the design, function, or operation of any plant equipment. No change to the facility is being made as a result of this exemption. Therefore, the NRC staff concludes that the proposed exemption does not involve a significant construction impact.

The requested exemption does not alter the design, function, or operation of any plant equipment. There are no changes to plant radiation zones and no changes to controls required under 10 CFR Part 20, which preclude a significant increase in occupational radiation exposure. Therefore, the NRC staff concludes that the proposed exemption does not involve a significant increase in the potential for or consequences from radiological accidents.

The requested exemption involves reporting requirements related to the timing of using NRC-endorsed consensus standards on PRA which detail the initiating events and modes that must be covered in the PRA. Accordingly, the proposed exemption meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(25). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this exemption.

Docket Nos.: 52-025
52-026

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SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS AND CATEGORICAL
EXCLUSION RE: REQUEST FOR EXEMPTION FROM TIMING OF PRA
STANDARDS (EPID L-2018-LLE-0009) DATED OCTOBER 26, 2018

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