

Vogle PEmails

From: Habib, Donald
Sent: Thursday, December 13, 2018 11:30 AM
To: Chamberlain, Amy Christine; WASPARKM@southernco.com; Thomas, Corey (SNC); x2nhagge@southernco.com
Cc: Vogle PEmails; Patel, Chandu; Dixon-Herrity, Jennifer
Subject: ACCEPTANCE REVIEW OF SNC REQUEST FOR LICENSE AMENDMENT, EXEMPTION, AND ALTERNATIVE (LAR 18-031 AND PSI/ISI-ALT-12) FOR VEGP UNITS 3 AND 4 FOR CLARIFICATION OF ASME CODE SECTION III COMPLIANCE

Mr. Brian H. Whitley, Director
Regulatory Affairs
Southern Nuclear Operating Company, Inc.
42 Inverness Center Parkway
BIN B237
Birmingham, AL 35242

SUBJECT: ACCEPTANCE REVIEW OF SOUTHERN NUCLEAR OPERATING COMPANY'S REQUEST FOR LICENSE AMENDMENT, EXEMPTION, AND ALTERNATIVE (LAR 18-031 AND PSI/ISI-ALT-12) FOR THE VOGTLE ELECTRIC GENERATING PLANT UNITS 3 AND 4 FOR CLARIFICATION OF ASME CODE SECTION III COMPLIANCE AND ALTERNATIVE REQUIREMENTS FOR ASME SECTION III PRESSURE TESTS CONDUCTED FOLLOWING THE COMPLETION OF ASME SECTION III CONSTRUCTION ACTIVITIES (EPID L-2018-LLA-0497)

By letter dated November 29, 2018 (Agencywide Documents Access and Management System (ADAMS) under Accession No. ML18333A337), Southern Nuclear Operating Company (SNC) submitted a request for a license amendment, exemption, and code alternative for the Combined License (COL) Numbers NPF-91 and NPF-92, Vogtle Electric Generating Plant (VEGP) Units 3 and 4. The requested amendment proposes changes to plant-specific Tier 1 information and corresponding changes to COL Appendix C to clarify that when a Design Commitment or Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) provides that an item or activity must comply with ASME Code Section III, this means compliance with the ASME Section III Code, as incorporated by reference in 10 CFR 50.55a with specific conditions, or in accordance with alternatives authorized by the NRC pursuant to 10 CFR 50.55a. SNC's submittal also requests NRC authorization to use an alternative to the requirements of ASME Section III, NB-6221(a), NC-6221(a), ND-6221(a), NB-6321(a), NC-6321(a), and ND-6321(a) of the ASME Boiler and Pressure Vessel (B&PV) Code, 1998 Edition through the 2000 Addenda (Code of Record) for VEGP Units 3 and 4. The proposed request for alternative is applicable to pressure testing following repair and/or replacement activities that occur following the completion of all ASME Section III construction activities and application of the ASME certification marking.

SNC has also requested an exemption from the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52, Appendix D, Section III.B, "Design Certification Rule for the AP1000 Design, Scope and Contents," to allow a departure from the elements of the certification information in Tier 1 of the generic Design Control Document.

The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed amendment, exemption, and code alternative, in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. If additional information is needed, you will be advised by separate correspondence.

Based on the information provided in your submittal [and discussions during the pre-licensing meetings on September 27 and November 15, 2018, the NRC staff has estimated that this licensing request will take approximately 190 hours to complete. The NRC staff expects to complete this review in approximately 6 months, which is May 30, 2019. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

These estimates are based on the NRC staff's initial review of the application and they could change due to several factors including requests for additional information, unanticipated addition of scope to the review, and review by NRC advisory committees or hearing-related activities. Additional delay may occur if the submittal is provided to the NRC in advance or in parallel with industry program initiatives or pilot applications.

If you have any questions, please contact me.

**Donald Habib
Project Manager
Licensing Branch 4
Division of Licensing, Siting, and Environmental Analysis
Office of New Reactors
301-415-1035**

Hearing Identifier: Vogtle_COL_Docs_Public
Email Number: 396

Mail Envelope Properties (MWHPR0901MB2171517CB2429245C011C3A597A00)

Subject: ACCEPTANCE REVIEW OF SNC REQUEST FOR LICENSE AMENDMENT, EXEMPTION, AND ALTERNATIVE (LAR 18-031 AND PSI/ISI-ALT-12) FOR VEGP UNITS 3 AND 4 FOR CLARIFICATION OF ASME CODE SECTION III COMPLIANCE

Sent Date: 12/13/2018 11:29:34 AM

Received Date: 12/13/2018 11:29:41 AM

From: Habib, Donald

Created By: Donald.Habib@nrc.gov

Recipients:

"Vogtle PEmails" <Vogtle.PEmails@nrc.gov>

Tracking Status: None

"Patel, Chandu" <Chandu.Patel@nrc.gov>

Tracking Status: None

"Dixon-Herrity, Jennifer" <Jennifer.Dixon-Herrity@nrc.gov>

Tracking Status: None

"Chamberlain, Amy Christine" <ACCHAMBE@southernco.com>

Tracking Status: None

"WASPARKM@southernco.com" <WASPARKM@southernco.com>

Tracking Status: None

"Thomas, Corey (SNC)" <BRCThoma@southernco.com>

Tracking Status: None

"x2nhagge@southernco.com" <x2nhagge@southernco.com>

Tracking Status: None

Post Office: MWHPR0901MB2171.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	5129	12/13/2018 11:29:41 AM

Options

Priority: Standard

Return Notification: No

Reply Requested: No

Sensitivity: Normal

Expiration Date:

Recipients Received: