

## **NRR-DMPSPEm Resource**

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**From:** Lamb, John  
**Sent:** Monday, April 15, 2019 10:24 AM  
**To:** Lowery, Ken G.  
**Subject:** Request for Additional Information (RAI) for Vogtle TSTF-412 Adoption LAR (L-2018-LLA-0731)

Mr. Lowry:

By letter dated December 19, 2018, Southern Nuclear Operating Company, Inc. (SNC) submitted a license amendment request (LAR) for the Vogtle Electric Generating Plant, Units 1 and 2 (Vogtle), (Agencywide Documents and Access Management System Accession No. ML18353B056; EPID L-2018-LLA-0731) to adopt TSTF-412, Revision 3, "Provide Actions for One Steam Supply to Turbine Driven AFW/EFW Pump Inoperable."

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed your application and determined that additional information is needed to complete its detailed technical review to make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements and the protection of public health and safety and the environment. Enclosed is the request for additional information.

Thanks.  
John

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### **REQUEST FOR ADDITIONAL INFORMATION**

Section 2.2 of Enclosure 1 of the LAR states:

SNC is not proposing any variations or deviations from the technical specification changes described in TSTF-412, Revision 3, or the NRC staff's model safety evaluation published in the *Federal Register* on July 17, 2007 (72 FR 39089).

Upon review of the LAR and comparison of existing Vogtle TS to the STS as modified by TSTF-412, there appear to be variations between the Vogtle Technical Specification (TS) and Standard Technical Specification (STS) and deviations in the adoption of TSTF-412.

Vogtle TS contain an existing Conditions A, B and C which allow for Completion Time in accordance with the Risk Informed Completion Time. STS as modified by TSTF-412 do not contain risk informed completion times. Existing Condition C in Vogtle TS describes the situation where two AFW trains are inoperable. The associated Required Action is to restore Auxiliary Feedwater (AFW) trains to OPERABLE status within 1 hour or with a Completion Time in accordance with the Risk Informed Completion Time. For the situation where two AFW trains are inoperable, the STS as modified by TSTF-412 require the plant to be in MODE 3 in 6 hours and plant specifically appropriate lower MODE within a plant specifically appropriate time.

(1) Please provide an explanation of the variation between Vogtle TS and STS as modified by TSTF-412 as well as the deviations from the TS changes described in TSTF-412.

(2) Please provide a discussion of the need for a new Condition C in Vogtle TS, which describes a very limited case of two inoperable AFW trains, given the existing Condition C apparently applies to all cases of two inoperable AFW trains.

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