NRR-DRMAPEm Resource

From: Lamb, John
Sent: Friday, August 2, 2019 6:30 AM
To: Lowery, Ken G.
Subject: Acceptance Review - Vogtle LAR regarding End State Revision from Hot Shutdown to Cold Shutdown for Several TSs (L-2019-LLA-0148)

Importance: High

Dear Mr. Lowery:

By letter dated July 9, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19190A309), Southern Nuclear Operating Company (SNC, the licensee) submitted a license amendment request (LAR) for Vogtle Electric Generating Plant (VEGP), Units 1 and 2. The proposed amendment for each unit revises the actions of Technical Specification (TS) 3.7.7, "Component Cooling Water (CCW) System," TS 3.7.8, "Nuclear Service Cooling Water (NSCW) System," TS 3.8.1, "AC Sources-Operating," TS 3.8.4, "DC Sources- Operating," TS 3.8.7, "Inverters- Operating," and TS 3.8.9, "Distribution Systems – Operating." The proposed LAR modifies action end states for the subject TS in conditions, where more than one safety-related train is inoperable or the electrical power system is significantly degraded. Specifically, if the related required action statements are not met, then instead of requiring the plant to achieve hot shutdown (i.e., Mode 4), the end state of cold shutdown (i.e., Mode 5) is required. By letter dated May 31, 2016 (ADAMS Accession No. ML16130A577), the NRC approved license Amendment Nos. 179 and 160 for VEGP, Units 1 and 2, respectively, to implement Technical Specification Task Force (TSTF) traveler TSTF-432, "Change in Technical Specifications End States (WCAP-16294)," allowing a plant shutdown to hot conditions instead of cold conditions. By letter dated August 8, 2017 (ADAMS Accession No. ML15127A669), the NRC approved license Amendment Nos. 188 and 171 for VEGP, Units 1 and 2, respectively, to permit the use of Risk-Informed Completion Times (RICTs). The updated TS pages issued with Amendment Nos. 188 and 171 incorporating the RICT TS changes resulted in unintended consequences. The RICT TS changes allowed a hot shutdown end state instead of cold shutdown end state following a loss of function condition for CCW, NSCW, and electrical distribution systems, and following a significant degradation of the electrical power systems.

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 LAR. 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 LAR 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.

By letter dated July 9, 2019, SNC requested that the NRC staff complete the review of this proposed LAR by October 1, 2019, which is 2.5 months. The NRC's Fiscal Year 2019 Congressional Budget Justification (CBJ, NUREG-1100, Volume 34, ADAMS Accession No. ML18023B460) contains performance metrics associated with the age of the licensing actions inventory (see pages 21 and 22). This performance indicator requires that 95-percent of all licensing actions be completed in 1 year or less, and 100-percent of all licensing actions be

completed in 2 years or less, unless they meet the approved exclusions noted in the performance indicator. SNC's request for the NRC staff to complete its review of this proposed LAR in 2.5 months is significantly shorter than the NRC 1 year performance indicator.

Based on the information provided in your submittal, the NRC staff has estimated that this LAR will take approximately 440 hours to complete. The NRC staff expects to complete this review in approximately 12 months, which is August 2020. The NRC staff will try its best to complete this licensing action by May 2020. 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.

John G. Lamb, Senior Project Manager
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Office of Nuclear Reactor Regulation

Hearing Identifier: NRR_DRMA
Email Number: 152

Mail Envelope Properties (DM6PR09MB3978D1940AFB46831D899749FAD90)

Subject: Acceptance Review - Vogtle LAR regarding End State Revision from Hot Shutdown to Cold Shutdown for Several TSs (L-2019-LLA-0148)
Sent Date: 8/2/2019 6:30:03 AM
Received Date: 8/2/2019 6:30:00 AM
From: Lamb, John

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Tracking Status: None

Post Office: DM6PR09MB3978.namprd09.prod.outlook.com

Files	**Size**	**Date & Time**
MESSAGE	5392	8/2/2019 6:30:00 AM

Options
Priority: High
Return Notification: No
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Sensitivity: Normal
Expiration Date:
Recipients Received: