

September 6, 2019

Docket Nos.: 52-025
52-026

ND-19-0947
10 CFR 50.90
10 CFR 52.63

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4
Request for License Amendment:
Removal of the Preoperational Passive Residual Heat Removal Heat Exchanger
Natural Circulation Test (LAR-19-017)

Ladies and Gentlemen:

Pursuant to 10 CFR 52.98(c) and in accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC), the licensee for Vogtle Electric Generating Plant (VEGP) Units 3 and 4, requests an amendment to Combined License Numbers NPF-91 and NPF-92, for VEGP Units 3 and 4, respectively. The requested amendment includes changes to the Updated Final Safety Analysis Report (UFSAR) in the form of departures from the incorporated plant-specific Design Control Document (DCD) Tier 2 information and related changes to the VEGP Units 3 and 4 COL Appendix C (and corresponding plant-specific DCD Tier 1) information.

Pursuant to the provisions of 10 CFR 52.63(b)(1), an exemption from elements of the design certified in the 10 CFR Part 52, Appendix D, Design Certification Rule, is also requested for the plant-specific Tier 1 material departure.

The requested amendment includes a change to remove the natural circulation test of the passive residual heat removal (PRHR) heat exchanger, which is conducted during preoperational testing, from the scope of the initial test program. In lieu of performing this test according to Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) 2.2.03.08b.01, the ITAAC will be updated to reflect the heat removal performance test of the PRHR heat exchanger under forced flow conditions. Because the proposed changes impact plant-specific Tier 1 information, this activity has been determined to require prior NRC approval.

Enclosure 1 provides the proprietary description, technical evaluation, regulatory evaluation (including the significant hazards consideration), and environmental considerations for the proposed changes **(Withheld Information)**. The enclosure contains information proprietary to Westinghouse Electric Company LLC ("Westinghouse"), it is supported by an Affidavit signed by Westinghouse, the owner of the information. The Affidavit sets forth the basis on which the information may be withheld from public disclosure by the Nuclear Regulatory Commission

("Commission") and addresses with specificity the considerations listed in paragraph (b)(4) of Section 2.390 of the Commission's regulations. Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations. Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse Affidavit should reference CAW-19-4936 and should be addressed to Camille T. Zozula, Manager, Infrastructure & Facilities Licensing, Westinghouse Electric Company, 1000 Westinghouse Drive, Suite 165, Cranberry Township, Pennsylvania 16066.

Enclosure 2 provides the non-proprietary description, technical evaluation, regulatory evaluation (including the significant hazards consideration), and environmental considerations for the proposed changes.

Enclosure 3 provides the background and supporting basis for the requested exemption.

Enclosure 4 provides the proposed changes to the licensing basis documents.

Enclosure 5 provides the Westinghouse Proprietary Information Notice, Copyright Notice and CAW-19-4936, supporting the proprietary nature of information provided in Enclosure 1.

Enclosure 1 contains information that is considered proprietary; therefore, Enclosure 1 is requested to be withheld from disclosure to the public under 10 CFR 2.390.

This letter contains no regulatory commitments. This letter has been reviewed and confirmed to not contain security-related information.

SNC requests NRC staff review and approval of the license amendment request (LAR) no later than January 10, 2020. Approval by this date will allow sufficient time to implement licensing basis changes necessary to support activities related to the PRHR heat exchanger preoperational test. SNC expects to implement the proposed amendment within thirty days of approval of the LAR.

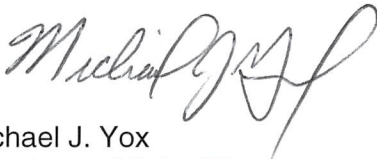
In accordance with 10 CFR 50.91, SNC is notifying the State of Georgia of this LAR by transmitting a copy of this letter and enclosures to the designated State Official.

Should you have any questions, please contact Mr. Steven Leighty at (706) 848-6790.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on the 6th of September 2019.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



Michael J. Yox
Regulatory Affairs Director
Vogtle 3 & 4

MJY/PSF/sfr

- Enclosures: 1) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Request for License Amendment: Removal of the Preoperational Passive Residual Heat Removal Heat Exchanger Natural Circulation Test (Proprietary) (LAR-19-017) **(Withheld Information)**
- 2) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Request for License Amendment: Removal of the Preoperational Passive Residual Heat Removal Heat Exchanger Natural Circulation Test (Non-proprietary) (LAR-19-017)
- 3) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Exemption Request: Removal of the Preoperational Passive Residual Heat Removal Heat Exchanger Natural Circulation Test (LAR-19-017)
- 4) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Proposed Changes to the Licensing Basis Documents (LAR-19-017)
- 5) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Westinghouse Proprietary Information Notice, Copyright Notice and CAW-19-4936, (LAR-19-017)

cc:

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