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UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

Docket Nos. 50-4242 and 50-425

DEC 2 2 1980

APPLICANT: Georgia Power Company

FACILITY: Vogtle Nuclear Power Plant, Units 1 and 2

SUMMARY OF MEETING ON DELETION OF THE CONTAINMENT ENCLOSURE SUBJECT:

BUILDING

Summary

A meeting was held at NRC Headquarters, 7920 Norfolk Avenue, Bethesda, Maryland on Monday afternoon, December 1, 1980. The applicant was represented by members of Georgia Power Company, Southern Services Company, Bechtel Corporation, Westinghouse, Pickard Lowe & Garrick, and Shaw Pittman Potts & Trowbridge. The NRC was represented by members of the Divisions of Licensing and Systems Integration, and the Office of Executive Legal Director. An attendance list is enclosed as Enclosure 1.

The meeting was requested by Georgia Power Company to describe changes in the proposed design modification described in Supplement 6 submitted by a letter dated August 21, 1979, and to request an expedited review by the NRC staff, if possible.

At the meeting, the NRC staff presented a letter informing the applicant that the proposed deletion of the containment enclosure building must be considered under an amendment to the construction permits. The applicant indicated it will file a request for amendment of construction permits as quickly as this document can be prepared.

The applicant informed the staff that it has the ability and intends to reduce the primary containment design leak rate from 0.3%/day (given in Supplement 6) to 0.2%/day. Using this achievable reduction in containment leak rate, plus supplemental meteorological data, the applicant presented analyses which show the accident doses substantially equal to those calculated and accepted by the staff in the SER issued March 1974.

The meeting ended with a discussion on actions by the applicant necessary to expedite the review to a conclusion by the January 31, 1981 date requested by the applicant.

Meeting Details

At the beginning of the meeting, the NRC staff presented a letter to Georgia Power Company dated December 1, 1980 informing the applicant that the staff concludes the proposed change must be considered under an amendment to the construction permits. Enclosure 2 is a copy of that letter. The applicant responded that it would submit a request for amendment of construction permits as soon as this document could be prepared. On receiving the request we will notice the proposed action. A safety evaluation must be prepared before favorable action can be taken on the request.

The applicant (Mr. O. Batum) made a presentation which presented the proposed design modification should be acceptable because:

- New meteorological data supports a more favorable set of X/Q's for the accident analyses.
- 2) The applicant has the ability and intends to tighten the containment design leak rate from 0.3%/day to 0.2%/day.
- 3) The removal of the enclosure structure will increase the structural margin of the primary containment for earthquake loads.

The meteorological data was submitted by a letter dated December 7, 1979. The applicant will include information on the change in containment design leak rate and on the impact of the proposed design modification on structural response of the containment building to earthquake loads in the forthcoming submittal. The staff also requested that the forthcoming submittal include a listing of containment penetrations located within the enclosure building.

The staff (L. Rubenstein) inquired whether the applicant was considering how the forthcoming rulemaking on hydrogen control and degraded core accidents might impact the design modification. The applicant (R. Thomas) responded that it is conforming to the present requirements for containment design; it doesn't know how to predict forthcoming requirements. The staff cautioned that forthcoming rulemaking may impose future problems consequent to the deletion of the enclosure building.

The applicant (A. Nakashima) made a presentation using the following viewgraph slides (Enclosure 3):

- 3-1) Enclosure building presentation; an outline.
- 3-2) Increase emphasis on leakage reduction and leakage mitigation.
- 3-3) FSAR calculation assumptions used to evaluate radioactive releases for a loss-of-coolant accident.
- 3-4) FSAR dose comparison; 10 CFR 100 limits, SER calculation, FSAR calculation @ 0.2%/day leakage without filtration.
- 3-5) FSAR dose comparison; 10 CFR 100 limits, SER calculation, FSAR calculation @ 0.3%/day leakage without filtration, FSAR calculation @ 0.2%/day leakage without filtration.
- 3-6) Summary and conclusions.

The presentation ended with the applicant concluding that the reduction in containment design leak rate and improvements in meteorological data provide accident doses substantially equal to those calculated by NRC staff in the SER issued March 1974, and well below the guideline doses given in 10 CFR Part 100.

At this point, D. Ross (NRC) commented as follows: There are two principal technical points to be considered:

- a) Does the NRC staff agree with the applicant's meteorology? It was noted that the X/Q's used in the above analyses are identical to values calculated by the staff in a memorandum L. G. Hulman to L. Rubenstein dated January 16, 1980 (Enclosure 4).
- b) Does the NRC staff concur on the 0.2%/day leak rate? It was noted that staff considers this an achievable containment leak rate.

A. Schwencer (NRC) commented that the structural changes to the containment should also be reviewed.

The meeting closed with a discussion of actions the applicant and staff might take to complete the review of this matter by the requested decision date of January 31, 1981. The first step must be the submittal of a request for amendment of construction permits. Upon receipt of that document the staff will publish a notice of the proposed action. The start of the staff review must await the changes to Supplement 6 and the additional information requested above.

S. B. Burwell, Project Manager Licensing Branch No. 2

Division of Licensing

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Enclosures: As stated

cc w/enclosures: See next page

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> Mr. Ruble A. Thomas Vice President Southern Services, Inc. P. O. Box 2625 Birmingham, Alabama 35202

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ENCLOSURE 1

MEETING ATTENDANCE

MONDAY, DECEMBER 1, 1980

VOGTLE NUCLEAR POWER PLANT, UNITS 1 AND 2

NRC/NRR STAFF

S. Burwell

L. Rubenstein

A. Schwencer

P. Hearn

W. Butler

F. Akstulewicz

D. Ross

PICKARD, LOWE & GARRICK

K. Woodard

SHAW, PITTMAN, POTTS & TROWBRIDGE

E. Blake

NRC/OELD

E. Reis

GEORGIA POWER/SOUTHERN SERVICES

R. Thomas O. Batum

H. Nix

D. Dutton

J. Bailey

BECHTEL POWER CORPORATION

B. Lex

A. Nakashima

S. Shapiro

J. Wehrenberg

WESTINGHOUSE

K. Rubin



NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20655

DEC 0 1 1980

Docket Nos. 50-424 and 50-425

> Mr. W. E. Ehrensperger Senior Vice President Power Supply Georgia Power Company P. O. Box 4545 Atlanta, Georgia 30302

Dear Mr. Ehrensperger:

SUBJECT: DELETION OF THE CONTAINMENT ENCLOSURE BUILDING ON THE A. W. VOGTLE

In a letter dated August 21, 1979, Georgia Power Company filed Supplement 6 to its application for Construction Permit and Operating License for the A. W. Vogtle plant. This supplement described a modification to the plant design deleting the containment enclosure building and its safety grade exhaust and recirculation system. The modification replaced the enclosure building with an equipment building extending upward from grade to about one third of the containment building height. The equipment building is not designed to perform a safety function. This supplement also included revised analyses for the radiological consequences of a Loss-of-Coolant Accident, with the calculations not taking credit for the enclosure building. The proposed deletion of the enclosure building and its safety function was previously discussed in a meeting with the NRC staff on August 8, 1979. In that meeting, you requested an expeditious review and prompt decision on the design change.

In a letter dated April 28, 1980, Georgia Power Company advised that the need for a prompt decision on this design change had abated and may be delayed until January 31, 1981; and that the design was proceeding based upon deletion of the enclosure building.

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The staff believes that the deletion of the enclosure building appears to represent a significant change in safety margin to the design for which we issued the construction permits. The change would impact and invalidate the evaluations presented in the Safety Evaluation Report issued March 8, 1974. Therefore, we conclude that the proposed change must be considered under an amendment to the construction permits. If you wish to pursue this matter, please provide a Request for Amendment of Construction Permits. Such a request for amendment should include a cost-benefit analysis that demonstrates that the reduced safety margin would be warranted by the savings in cost associated with deleting the containment enclosure building. Conversely, you may provide us with your basis for concluding that the proposed modification to the enclosure building should not be considered a change in "the proposed design of the facility as described in your application including, but not limited to the principal architectural and engineering criteria for the design" or in "the major features or components incorporated therein for the protection of the health and safety of the public."

Sincerely.