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ND-20-0392  
10 CFR 50.54(q)

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

Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Units 3 and 4  
Report of Changes to Emergency Plan Emergency Action Levels and Summary of 50.54(q)  
Analysis

Ladies and Gentlemen:

Pursuant to 10 CFR 50.54(q)(5), Southern Nuclear Operating Company (SNC) hereby submits descriptions of changes to the emergency plan emergency action levels and a summary of the analysis demonstrating that the changes do not reduce the effectiveness of the plan. The emergency plan continues to meet the requirements in 10 CFR 50 Appendix E and the planning standards of 10 CFR 50.47(b). A description of the changes and a summary of the 50.54(q) analysis is enclosed.

This letter contains no regulatory commitments. If you have questions, please contact Ms. Stephanie Agee at (205) 992-7556.

Respectfully submitted,

Amy C. Chamberlain  
Manager, Regulatory Affairs  
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Enclosure: Vogtle Electric Generating Plant (VEGP) Units 3 and 4, Report of Changes Made to Emergency Plan Emergency Action Levels and Summary of 50.54(q) Analysis

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**Southern Nuclear Operating Company**

**ND-20-0392**

**Enclosure**

**Vogtle Electric Generating Plant (VEGP) Units 3 and 4**

**Report of Changes Made to Emergency Plan Emergency Action Levels and Summary of  
50.54(q) Analysis**

**(Enclosure consists of 3 pages, including this cover page.)**

## **Description of the Emergency Plan Changes and Summary of 50.54(q) Analysis**

### **Vogtle Units 3 and 4 Emergency Plan Annex Emergency Action Levels**

The Standard Emergency Plan (SEP) Annex Emergency Action Levels for Vogtle Electric Generating Plant (VEGP) Units 3 and 4 are changed to reflect changes made to add plant specific values related to AP1000 design finalization and correct editorial issues related to spelling, grammar, special character display, spacing, and punctuation.

Listed below is a detailed list of the changes to the SEP Annex for VEGP 3 and 4:

- Change Unusual Event to Notification of Unusual Event.
- General changes to the document to correct grammar, spelling, spacing, percent signs, special characters, etc.
- Added site specific title - VEGP Units 3 and 4 Offsite Dose Calculation Manual (ODCM)
- Added definition "NEEDED FOR SAFE COOLDOWN OR SAFE SHUTDOWN" and changed its use throughout the document.
- Added ISFSI to Section 5.2 Acronyms & Abbreviations
- Added RCDT to Section 5.2 Acronyms & Abbreviations
- Removed RWS from Section 5.2 Acronyms & Abbreviations and replaced with correct acronym, WRS
- Throughout the document modified the format of EALs to be sorted alpha-numeric and to have a noun name
- Added titles to various references
- Added RS1 site-specific values
  - TDS-RY001 - Turbine Island Vent 1.00E+02  $\mu\text{Ci/cc}$
  - VFS-RY104A - Plant Vent 3.90E+00  $\mu\text{Ci/cc}$
  - VFS-RY104B - Plant Vent 3.90E+00  $\mu\text{Ci/cc}$
- Added site-specific setpoint document reference to RS1 references
- Added RG1 site-specific values
  - TDS-RY001 - Turbine Island Vent 1.00E+03  $\mu\text{Ci/cc}$
  - VFS-RY104A - Plant Vent 3.90E+01  $\mu\text{Ci/cc}$
  - VFS-RY104B - Plant Vent 3.90E+01  $\mu\text{Ci/cc}$
- Added site-specific setpoint document reference to RG1 references
- Changed RU2 from Spent Fuel Pool Low Alarm (SFS-LT019A/B/C) to Low-2 SFP Lvl BS Trip Alarm (SFS-LT019A/B/C)
- Added "reads out in mrad/hr" for clarification to RA3
- Revised CU1 to clarify that the inability to restore and maintain RCS level is concurrent with indications of RCS leakage
- Revised the statements in the basis for CS1 regarding containment closure to align with the definition of containment closure
- Revised wording in Table C-5 for CA2 regarding intact and reduced inventory to align with Table C-2 for CA3
- Revised listing of communications equipment in Table C-3 for CU5
- Added applicable notification agencies to HU1 and HA1
- Revised the title of the spill prevention plan in HU3

ND-20-0392

Enclosure

Report of Changes Made to Emergency Plan Emergency Action Levels and Summary of 50.54(q) Analysis

- Added the term “functionality” to address equipment controlled by the Technical Requirements Manual to the basis of HU3
- Revised the EAL implementing procedure number in the HU3 basis
- Added spill prevention plan number to references of HU3
- Revised the EAL implementing procedure number in the HA5 references
- Provided additional detail to the basis of SS1 regarding the use of the associated abnormal procedure
- Removed a paragraph from the basis of SS1 EAL 2 because the information was inadvertently included from SS1 EAL1 and has no relevance to SS1 EAL 2
- Clarified the SU5 to add a subsequent automatic trip as well as manual initial trip meets the qualifying criteria
- The wording of SU5 and SA5 was revised regarding the rod drive MG sets because the control scheme was changed
- Revised the applicable communication equipment titles in SU6 to reflect current SNC terminology
- Revised the containment pressure setpoint in SU7 due to a design change
- Revised the definition of “Visible Damage” for CA7 and SA8 to address EPFAQ 2016-002
- Added UFSAR Table 7.4-1 to the references of SA8
- Revised SS5 to read that all subsequent operator actions are not successful
- Set points were added to Fuel Clad 3, RCS Activity/CTMT Radiation Loss; Reactor Coolant System, 3, RCS Activity / CTMT Radiation Loss; Containment 3, RCS Activity / CTMT Radiation, Potential Loss
- Revised the containment pressure setpoint for Containment 4, CTMT Integrity or Bypass, Potential Loss
- Added CVA – Chemical and Volume Control System to list of acronyms
- Added CCS – Component Cooling Water System to list of acronyms

### **10 CFR 50.54(q) Analysis Summary**

Editorial changes including spelling corrections, grammatical corrections, title changes, and reformatting or renumbering changes were evaluated as no change to the emergency plan.

The addition of site-specific values was performed in accordance with the process defined in the approved EAL scheme in Vogtle 3 and 4 License Amendments 77 and 76, respectively.

Clarifications to the EAL bases were evaluated in accordance with regulatory guidance and determined that the changes did not constitute a change to the EAL scheme and did not have an adverse impact on the timeliness or accuracy of EAL classifications.

Consequently, the changes continue to meet the requirements of 10 CFR 50.47(b), 10 CFR 50, Appendix E, and the changes do not reduce the effectiveness of the emergency plan.