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52-026

ND-20-0534
10 CFR 50.54(q)

U.S. Nuclear Regulatory Commission
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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
Southern Nuclear Operating Company

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-20-0534

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 2 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 (EALs) for Vogtle Electric Generating Plant (VEGP) Units 3 and 4 are changed to reflect editorial enhancements, correction and addition of references and clarification of technical bases.

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

- CA7 EAL 1 and SA8 EAL 1 – corrected the order of system, structure, or component.
- FG1 – capitalized and underlined AND.
- FA 1 – lowercased the "b" in barrier.
- Fission Product Barrier Table – Inadequate Heat Removal – 2.A – added note regarding timeliness of the declarations
- Fission Product Barrier Table – Containment Integrity or Bypass – 2.A – added note regarding timeliness of the declarations.
- HU7 – changed "a NOUE" to "an NOUE."
- SS1 – added a comma between "exceeded" and "or in Note 1.
- SU4 – added a note regarding timeliness of the declaration for EALs 1 and 2 to be consistent with EAL 3.
- SU5 – changed "manual trip action" to "manual action."
- SU6 – EAL 1, capitalized "Onsite."

Listed below is a summary of reference related changes:

- The reference to NEI 07-01 was removed as the basis for the EAL scheme and replaced with Amendments 77 and 76 (Vogtle Electric Generating Plant Units 3 and 4 LAR 16-002).
- Documents used as references to specific EALs were added to the list of references.

Listed below is a list of clarifications made to EAL bases:

- RA3 – provided the basis for equivalency between mR/hr and mrad/hr.
- SU2 – added clarification to for determining what plant conditions constitute a partial loss of indicating, monitoring, and control functions
- SU5 – added an example of how a manual reactor trip is unsuccessful.
- SU7 – clarified nomenclature for signals that provide for containment isolation and clarified how containment penetrations should be considered isolated.
- Containment Barrier – Loss 4.A.2 – clarified plant conditions that constitute leakage between two interfacing liquid systems.

10 CFR 50.54(q) Analysis Summary

Editorial changes were evaluated as no change to the emergency plan.

Addition of references and 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.