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10 CFR 52 App. D

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

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4
Report of 10 CFR 50.59 Changes, Tests and Experiments and
10 CFR 52 Appendix D Departure Report

#### Ladies and Gentlemen:

This submission is made with regard to the Vogtle Electric Generating Plant (VEGP) Units 3 and 4, Combined License (COL) numbers NPF-91 and NPF-92, respectively, in accordance with the reporting requirements of 10 CFR 50.59(d)(2) and 10 CFR 52, Appendix D, paragraphs X.B.1 and X.B.3.b.

In accordance with VEGP 3&4 COL License Condition 2.D.(13)(b).2, included in this submission are departures from Tier 2\* information that were evaluated against the requirements for Tier 2 departures in 10 CFR Part 52, Appendix D, Paragraph VIII.B.5, as modified by the exemption in License Condition 2.D.(13)(a) and therefore did not require prior NRC approval under the exemption in License Condition 2.D.(13)(a).

For the period of November 12, 2019 through May 11, 2020, there were no changes made pursuant to paragraph (c) of 10 CFR 50.59.

Enclosure 1 provides the report containing a brief description of plant-specific departures, including a summary of the evaluation of each, as required by 10 CFR 52, Appendix D, paragraphs X.B.1 and X.B.3.b, for the period of November 12, 2019 through May 11, 2020. Also included in Enclosure 1 is licensing document change request (LDCR)-2016-107, which was approved February 8, 2019 but was not included in the 10 CFR 52 Appendix D Departure Report dated June 10, 2019 [ADAMS Accession No. ML19161A362]. Additionally, LDCR-2019-130 was approved November 12, 2019 (during this reporting period) but was included in the 10 CFR 52 Appendix D Departure Report dated June 10, 2019.

Enclosure 2 provides the report containing a brief description of the departures from Tier 2\* information that did not require prior NRC approval under the exemption in License Condition 2.D.(13)(a) and summaries of the departure evaluations, as required by License Condition 2.D.(13)(b).2 for the period of November 12, 2019 through May 11, 2020.

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

If you have questions, please contact Ms. Amy Chamberlain at 205-992-6361.

Respectfully submitted,

Amy & Chamberlain

Licensing Manager, Regulatory Affairs Southern Nuclear Operating Company

Enclosures

- 1) VEGP Units 3 and 4, Departure Report for the Period of November 12, 2019 through May 11, 2020
- 2) VEGP Units 3 and 4, Tier 2\* Departure Evaluation Report for the Period of November 12, 2019 through May 11, 2020

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# **Southern Nuclear Operating Company**

ND-20-0625

**Enclosure 1** 

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

Departure Report for the Period of November 12, 2019 through May 11, 2020

(This Enclosure consists of 49 pages, including this cover page)

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** Snubber Qualification Changes

#### **Brief Description of the Plant-Specific Departure:**

Changes were made to licensing basis description of snubber production and qualification testing. This activity made administrative and consistency changes within the licensing basis and removed references to QME-1-2007 for production testing of snubbers.

This departure resulted in changes to the UFSAR (plant-specific DCD).

#### **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** Update of EPRI Chemistry Guidelines and NEI 97-06 References

#### **Brief Description of the Plant-Specific Departure:**

The latest Electric Power Research Institute (EPRI) pressurized water reactor secondary water chemistry guidelines and Nuclear Energy Institute (NEI) steam generator program guidelines were incorporated.

This departure resulted in changes to the UFSAR (plant-specific DCD).

#### **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

**Exemption:** Yes  $\square$  No  $\boxtimes$ 

Unit 3 Amendment No.: 166
Unit 4 Amendment No.: 164

**Departure Title:** Reactor Coolant Pump (RCP) Speed Sensor Channel Calibration and

Response Time Test Surveillance Requirement Changes (LAR-19-008)

## **Brief Description of the Plant-Specific Departure:**

The Technical Specifications (TS) definition for Channel Calibration was changed in order to allow a qualitative check (i.e., sensor resistance and insulation resistance tests) as an acceptable means to perform channel calibration for the reactor coolant pump speed sensors. An additional change was made to allow the use of a conservatively allocated response time in lieu of measurement for the reactor coolant pump speed sensors and preamplifiers.

This departure resulted in changes to the UFSAR (plant-specific DCD), COL Appendix A Technical Specifications, and the TS Bases.

## **Summary of the Evaluation:**

This departure made changes to UFSAR Tier 2 information that involved changes to COL Appendix A Technical Specifications; therefore, a License Amendment Request (LAR-19-008) was submitted to the NRC.

The NRC approved this License Amendment Request and issued License Amendments 166 and 164 to COL NPF-91 for VEGP Unit 3 and COL NPF-92 for VEGP Unit 4, respectively.

The TS Bases changes conform to changes to COL Appendix A Technical Specification that required prior NRC review and approval. The changes did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment. The TS Bases changes did not involve a change to Tier 1 information, Tier 2\* information, or further TS changes. A 10 CFR 52, Appendix D, Section VIII / 50.59 screen/simplified evaluation determined that NRC approval was not required for this TS Bases change.

**Departure Number:** LDCR-2019-023 **License Amendment:** Yes ⊠ No □

Exemption: Yes ⋈ No □

Unit 3 Amendment No.: 167
Unit 4 Amendment No.: 165

**Departure Title:** Consolidation of Structural Building ITAAC

#### **Brief Description of the Plant-Specific Departure:**

Duplicative building and structure related Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) were consolidated. Clarification was added that evaluations of thickness deviations would be included in the reconciliation and thickness reports described in ITAAC Acceptance Criteria.

This departure resulted in changes to Tier 1 (plant-specific DCD) and COL Appendix C ITAAC.

## **Summary of the Evaluation:**

This departure made changes to Tier 1 information and COL Appendix C ITAAC; therefore, a License Amendment and Exemption Request (LAR-19-005) was submitted to the NRC.

The NRC approved this License Amendment and Exemption Request and issued License Amendments 167 and 165 to COL NPF-91 for VEGP Unit 3 and COL NPF-92 for VEGP Unit 4, respectively.

Exemption: Yes ⋈ No □

Unit 3 Amendment No.: 170
Unit 4 Amendment No.: 168

**Departure Title:** Functional Arrangement ITAAC Optimization

#### **Brief Description of the Plant-Specific Departure:**

The Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) for the functional arrangement of systems that could be verified by other means were removed.

This departure resulted in changes to Tier 1 (plant-specific DCD) and COL Appendix C ITAAC.

#### **Summary of the Evaluation:**

This departure made changes to Tier 1 information and COL Appendix C ITAAC; therefore, a License Amendment and Exemption Request (LAR-19-002) was submitted to the NRC.

The NRC approved this License Amendment and Exemption Request and issued License Amendments 170 and 168 to COL NPF-91 for VEGP Unit 3 and COL NPF-92 for VEGP Unit 4, respectively.

Exemption: Yes ⋈ No □

Unit 3 Amendment No.: 173 Unit 4 Amendment No.: 171

**Departure Title:** Addition of In-Containment Refueling Water Storage Tank to Radiation

Analyses

## **Brief Description of the Plant-Specific Departure:**

This departure incorporated the contribution of design basis passive residual heat removal heat exchanger leakage to the in-containment refueling water storage tank (IRWST) into normal operating doses. The north-east wall and west wall of the IRWST were credited as radiation shielding walls for normal operating doses.

This departure resulted in changes to Tier 1 (plant-specific DCD) and COL Appendix C ITAAC.

## **Summary of the Evaluation:**

This departure made changes to Tier 1 information and COL Appendix C ITAAC; therefore, a License Amendment and Exemption Request (LAR-19-003) was submitted to the NRC.

The NRC approved this License Amendment and Exemption Request and issued License Amendments 173 and 171 to COL NPF-91 for VEGP Unit 3 and COL NPF-92 for VEGP Unit 4, respectively.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: 178
Unit 4 Amendment No.: 177

**Departure Title:** Tornado Missile Protection for Main Steam Vent Stacks and Wall 11

#### **Brief Description of the Plant-Specific Departure:**

This departure changed the evaluation of the auxiliary building main steam safety valve vent stack openings and the auxiliary building Wall 11 openings for protection from tornado-generated missiles.

This departure resulted in changes to the UFSAR (plant-specific DCD).

#### **Summary of the Evaluation:**

This departure involved a revision to plant-specific Tier 2 information which met the criteria for a license amendment under 10 CFR 52, Appendix D, Section VIII.B.5.b(8), and thus required NRC approval for the Tier 2 departures (i.e., the proposed departure would result in a departure from a method of evaluation described in the plant-specific DCD used in establishing the design bases or in the safety analyses). Therefore, a License Amendment (LAR-19-014) was submitted to the NRC.

The NRC approved this License Amendment Request and issued License Amendments 178 and 177 to COL NPF-91 for VEGP Unit 3 and COL NPF-92 for VEGP Unit 4, respectively.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A
Unit 4 Amendment No.: 173

**Departure Title:** Reinforcement Changes for Wall L and Wall 7.3

#### **Brief Description of the Plant-Specific Departure:**

This departure revised the provided area of steel reinforcement for portions of Vogtle Unit 4 Wall L and Wall 7.3.

This departure resulted in changes to the UFSAR (plant-specific DCD).

#### **Summary of the Evaluation:**

This departure made changes to UFSAR Tier 2\* information that qualified as requiring prior NRC approval in accordance with License Condition 2.D.(13)(a); therefore, a License Amendment Request (LAR-19-016R1) was submitted to the NRC.

The NRC approved this License Amendment Request and issued License Amendment 173 to COL NPF-92 for VEGP Unit 4.

Exemption: Yes ⋈ No □

Unit 3 Amendment No.: 174
Unit 4 Amendment No.: 172

**Departure Title:** Onsite Standby Diesel Generator Loading Changes

#### **Brief Description of the Plant-Specific Departure:**

This departure added onsite standby diesel generator loads that are required for orderly plant shutdown, defense-in-depth, and prevention of automatic passive safety-related system actuation following anticipated operational occurrences. Additionally, Inspections, Tests, Analyses and Acceptance Criteria (ITAAC) for the function of onsite standby diesel generator breaker closing was deleted and combined with another ITAAC to prevent duplication of testing. Editorial updates were made for clarification and consistency. Finally, diesel generator automatically and manually sequenced loads were changed.

This departure resulted in changes to the UFSAR (plant-specific DCD), Tier 1 (plant-specific DCD), and COL Appendix C ITAAC.

#### **Summary of the Evaluation:**

Portions of this departure made changes to UFSAR Tier 2 information that involved changes to Tier 1 (and associated COL Appendix C); therefore, a License Amendment and Exemption Request (LAR-19-015) was submitted to the NRC.

The NRC approved this License Amendment and Exemption Request and issued License Amendments 174 and 172 to COL NPF-91 for VEGP Unit 3 and COL NPF-92 for VEGP Unit 4, respectively.

Portions of this plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A
Unit 4 Amendment No.: N/A

**Departure Title:** Changes to Circulating Water System Chemical Injection Subsystem

(CWSCIS) and Plant Gas System (PGS)

## **Brief Description of the Plant-Specific Departure:**

The plant gas system and circulating water system chemical injection subsystem were changed to vendor supplied skids that are shared between VEGP Units 3 and 4.

This departure resulted in changes to the UFSAR (plant-specific DCD).

#### **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

**Departure Number**: LDCR-2019-095 **License Amendment**: Yes ⊠ No □

Exemption: Yes ⋈ No □

Unit 3 Amendment No.: 176
Unit 4 Amendment No.: 175

**Departure Title:** Automatic Depressurization System (ADS) and Core Makeup Tank

(CMT) Design Parameters, Results Update of Small Break Loss-of-Coolant Accident (SBLOCA) Analysis, Post-LOCA Long-Term Cooling

Analysis, and Analyses of LOCA Events in Shutdown Modes

#### **Brief Description of the Plant-Specific Departure:**

This departure made changes to input parameters to small break loss-of-coolant accident (SBLOCA) analysis and made changes to the required borated water volume in each core makeup tank. This departure also incorporated design changes that impacted the SBLOCA analysis, the post-loss of coolant accident (LOCA) analyses, and the analyses of LOCA events in shutdown modes.

This departure resulted in changes to the UFSAR (plant-specific DCD), Tier 1 (plant-specific DCD), COL Appendix C ITAAC, COL Appendix A Technical Specifications, and Technical Specifications Bases.

#### **Summary of the Evaluation:**

Portions of this departure made changes to Tier 1 information, COL Appendix A Technical Specifications, COL Appendix C ITAAC, and UFSAR Tier 2 information that involved changes to Tier 1 (and associated COL Appendix C) and COL Appendix A Technical Specifications; therefore, a License Amendment and Exemption Request (LAR-19-009) was submitted to the NRC.

The NRC approved this License Amendment and Exemption Request and issued License Amendments 176 and 175 to COL NPF-91 for VEGP Unit 3 and COL NPF-92 for VEGP Unit 4, respectively.

Portions of this plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Portions of this plant-specific departure were conservatively determined to result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function may have been adversely affected, and such that the changes may result in an adverse change to a method of evaluation or use of an alternate method of evaluation.

These portions of the plant-specific departure did not result in a deviation from plant-specific DCD design information such that there is more than a minimal increase in the frequency of occurrence of an accident, likelihood of the occurrence of a malfunction of a structure, system or component (SSC) important to safety, consequences of an accident or malfunction; create the possibility of an accident of a different type or malfunction with a different result; result in a design basis limit for a fission product barrier being exceeded or altered; result in a departure from a method of evaluation; or a substantial increase in the probability of an ex-vessel severe accident previously determined to not be creditable such that it would become credible.

These portions of the departure did not involve a change to Tier 1 information, Tier 2\* information or the Technical Specifications. A 10 CFR 52 Appendix D, Section VIII evaluation determined that NRC approval was not required prior to implementing this portion of the departure.

The TS Bases changes conform to changes to COL Appendix A Technical Specification that required prior NRC review and approval. The changes did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment. The TS Bases changes did not involve a change to Tier 1 information, Tier 2\* information, or further TS changes. A 10 CFR 52, Appendix D, Section VIII / 50.59 screen/simplified evaluation determined that NRC approval was not required for this TS Bases change.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** Withdrawal of Regulatory Guide 1.148

#### **Brief Description of the Plant-Specific Departure:**

References to withdrawn Regulatory Guide 1.148 were removed from the UFSAR.

This departure resulted in changes to the UFSAR (plant-specific DCD).

#### **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** Clarification of Security Section

#### **Brief Description of the Plant-Specific Departure:**

The description of how the incorporated by reference Topical Reports for physical security design are incorporated was changed.

This departure resulted in changes to the UFSAR (plant-specific DCD).

#### **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/AUnit 4 Amendment No.: N/A

**Departure Title:** High-2 Bearing Water Temperature RCP trip Safety/Non-Safety Function

Discrepancy

## **Brief Description of the Plant-Specific Departure:**

References to "safety-related" when referring to the High-2 bearing water temperature reactor coolant pump (RCP) trip were removed from the UFSAR.

This departure resulted in changes to the UFSAR (plant-specific DCD).

#### **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** Liquid Radwaste System (WLS) IEEE 384-1981 Electrical Isolation

#### **Brief Description of the Plant-Specific Departure:**

Isolation devices necessary to adequately isolate the Class 1E dc and UPS System from the non-Class 1E plant control system were added.

This departure resulted in changes to the UFSAR (plant-specific DCD).

#### **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** Changes to Nuclear Instrumentation System (NIS) Input to the Plant

Control System (PLS)

#### **Brief Description of the Plant-Specific Departure:**

The corrected nuclear power input to the target axial flux difference calculation was replaced with the reactor coolant system  $\Delta T$  power.

This departure resulted in changes to the UFSAR (plant-specific DCD).

#### **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** Vibration Monitor Sensors (Accelerometers) Installed on ADS Stage 4

Squib Valves

## **Brief Description of the Plant-Specific Departure:**

Vibration monitors (accelerometers) were incorporated on certain piping systems to provide additional indication to the operator of the vibration levels on the piping systems.

This departure resulted in changes to the UFSAR (plant-specific DCD).

#### **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

**Exemption:**  $Yes \square No \boxtimes$ 

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** DCD/FSAR Figure Repairs Found During Drawing Simplification

#### **Brief Description of the Plant-Specific Departure:**

This departure made changes to substitute piping and instrumentation diagrams with simplified schematics. This simplification effort did not impact the actual design of the systems, and the information being deleted is either not required to be included, or sufficient information exists in other parts of the UFSAR.

This departure resulted in changes to the UFSAR (plant-specific DCD).

## **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: 165 Unit 4 Amendment No.: 163

**Departure Title:** Crediting Previously Completed ADS Blowdown First Three Plant Tests

#### **Brief Description of the Plant-Specific Departure:**

The requirement to perform the design-specific preoperational automatic depressurization system blowdown first three plant tests was removed.

This departure resulted in changes to the UFSAR (plant-specific DCD) and VEGP Units 3 and 4 COLs.

#### **Summary of the Evaluation:**

This departure made changes to UFSAR Tier 2\* information that qualified as requiring prior NRC approval in accordance with License Condition 2.D.(13)(a), and to the VEGP Units 3 and 4 COLs; therefore, a License Amendment Request (LAR-19-006) was submitted to the NRC.

The NRC approved this License Amendment Request and issued License Amendments 165 and 163 to COL NPF-91 for VEGP Unit 3 and COL NPF-92 for VEGP Unit 4, respectively.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

Departure Title: Technical Requirements Manual (TRM) Related Changes

#### **Brief Description of the Plant-Specific Departure:**

This departure made changes to the Tier 2 scope of the Technical Requirements Manual (TRM) to better align with the probabilistic risk assessment and Regulatory Treatment of Nonsafety Systems assumptions.

This departure resulted in changes to Tier 2 portions of the TRM.

#### **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A
Unit 4 Amendment No.: N/A

**Departure Title:** Update Code Section References for Sanitary Drainage System (SDS)

and Potable Water System (PWS) Testing and Inspection

## **Brief Description of the Plant-Specific Departure:**

The code to which the sanitary drainage system and potable water system are tested was changed.

This departure resulted in changes to the UFSAR (plant-specific DCD).

#### **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** PRHA Reconciliation with UFSAR Section 3.4

#### **Brief Description of the Plant-Specific Departure:**

Several changes were made to reflect the completed pipe rupture hazard analysis (PRHA), including revision of the yard tank volumes and changes to flood levels.

This departure resulted in changes to the UFSAR (plant-specific DCD).

#### **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** Update UFSAR Figure 3D.5-9

#### **Brief Description of the Plant-Specific Departure:**

The activity involved changes to the required conditions for AP1000 safety-related plant equipment qualification as well as the short term and long term environmental conditions (temperature) in the main steam isolation valve compartments and valve room 12306 for the equipment that is required to perform throughout postulated steamline break events in the auxiliary building.

This departure resulted in changes to the UFSAR (plant-specific DCD).

#### **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

**Exemption:** Yes  $\square$  No  $\boxtimes$ 

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** Removal of IRWST Vacuum Box Testing

#### **Brief Description of the Plant-Specific Departure:**

The requirement to perform vacuum box testing for in-containment refueling water storage tank seam welds was removed.

This departure resulted in changes to the UFSAR (plant-specific DCD).

#### **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: 168
Unit 4 Amendment No.: 166

**Departure Title:** PMS Technical Specification Surveillance Requirement Reduction

#### **Brief Description of the Plant-Specific Departure:**

This departure credited Protection and Safety Monitoring System (PMS) self-diagnostic testing features, allowing for removal of redundant manual PMS surveillance tests.

This departure resulted in changes to the UFSAR (plant-specific DCD), COL Appendix A Technical Specifications, and Technical Specifications Bases.

#### **Summary of the Evaluation:**

This departure made changes to UFSAR Tier 2 information that involved changes to COL Appendix A Technical Specifications; therefore, a License Amendment Request (LAR-19-001) was submitted to the NRC.

The NRC approved this License Amendment Request and issued License Amendments 168 and 166 to COL NPF-91 for VEGP Unit 3 and COL NPF-92 for VEGP Unit 4, respectively.

The TS Bases changes conform to changes to COL Appendix A Technical Specifications that required prior NRC review and approval. The changes did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment. The TS Bases changes did not involve a change to Tier 1 information, Tier 2\* information, or further TS changes. A 10 CFR 52, Appendix D, Section VIII / 50.59 screen/simplified evaluation determined that NRC approval was not required for this TS Bases change.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** Fire Protection Instrumentation, Editorial and Consistency Changes

#### **Brief Description of the Plant-Specific Departure:**

This departure replaced a valve in the fire protection system with a flow switch and removed a 3-hour fire barrier designation and depiction of a wall from around a floor penetration for conduits not fire rated.

An exception was added to UFSAR Table 9.5.1-3 to state that detectors are installed in accordance with NFPA 72-2019 where necessary to facilitate accessibility for installation and testing where corridors are congested with cable runs or other obstructions.

A passive residual heat removal heat exchanger outlet temperature instrument's location and fire zone is changed.

A 3-hour fire barrier designation is removed from the west side of the shield building for walls below the plant grade elevation.

Descriptions of fire detection features in UFSAR Appendix 9A were changed to show that the fire detectors are not installed in the air intake plenums.

Compliance with the test acceptance criteria in UFSAR Table 9.5.1-1 for penetration seals was changed to be consistent with the test methods approved in NUREG-1552 and a description was added regarding how qualification tests for penetration seals meet acceptance criteria.

This departure resulted in changes to the UFSAR (plant-specific DCD).

#### **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** PCS Air Baffle Turning Vane Removal

#### **Brief Description of the Plant-Specific Departure:**

The departure involved the removal of the Passive Containment Cooling System (PCS) air baffle flow guide (also known as a turning vane) from the design.

The departure resulted in changes to the UFSAR (plant-specific DCD).

#### **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** Miscellaneous Technical Specification Bases Changes

#### **Brief Description of the Plant-Specific Departure:**

Clarification is added to various Technical Specifications (TS) Bases to describe Protection and Safety Monitoring System (PMS) permissive interlocks in a consistent amount of detail for the automatic actuations performed by the PMS. An additional change was made to more accurately align the TS Bases with the actual TS requirements. Other TS Bases changes clarified the actual design detail descriptions and provided additional consistency in presentation details.

This departure resulted in changes to the TS Bases.

#### **Summary of the Evaluation:**

The plant-specific Technical Specification Bases changes did not result in a modification, addition to, or removal of a structure, system, or component such that a design function is adversely affected, did not impact plant operating procedures or a method of control that adversely affects a design function, did not revise or replace a method of evaluation, did not represent a test or experiment outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

This activity did not involve a change to plant-specific Tier 1 information, Tier 2 information, Tier 2\* information, or the Technical Specifications. A 10 CFR 52 Appendix D Section VIII screening determined that NRC approval is not required prior to implementing these changes.

**Departure Number:** LDCR-2019-152 **License Amendment:** Yes ⊠ No □

Exemption: Yes □ No ☒

Unit 3 Amendment No.: 169
Unit 4 Amendment No.: 167

**Departure Title:** Crediting Previously Completed First Plant Only Startup Tests

#### **Brief Description of the Plant-Specific Departure:**

This departure credited certain initial criticality tests, low-power tests, and power ascension tests performed at the first AP1000 plant. Prior to the descriptions of each credited test, a statement was added indicating the test was completed at the first AP1000 plant and is not required to be conducted at Vogtle Units 3 & 4.

This departure resulted in changes to the UFSAR (plant-specific DCD) and VEGP Units 3 and 4 COLs.

## **Summary of the Evaluation:**

This departure made changes to UFSAR Tier 2 information that involved a change to the VEGP Units 3 and 4 COLs and a change to or departure from UFSAR Tier 2\* information that qualified as requiring prior NRC approval in accordance with License Condition 2.D.(13)(a); therefore, a License Amendment Reguest (LAR-19-011) was submitted to the NRC.

The NRC approved this License Amendment Request and issued License Amendments 169 and 167 to COL NPF-91 for VEGP Unit 3 and COL NPF-92 for VEGP Unit 4, respectively.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** Update of IRWST Table 3.8.3-7

#### **Brief Description of the Plant-Specific Departure:**

This departure made changes to the design summary of the steel wall of the in-containment refueling water storage tank (IRWST) to reflect a reduction in the number of bolted connections joining the IRWST structural module with operating deck structural modules. This departure also reflects a revision of the containment internal structures ANSYS model to address issues with the modeling of the IRWST structural module bolted connections to operating deck structural modules and the incorporation of design debt.

This departure resulted in changes to the UFSAR (plant-specific DCD).

#### Summary of the Evaluation:

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

**Departure Number:** LDCR-2020-003 **License Amendment:** Yes ⊠ No □

Exemption: Yes □ No ☒

Unit 3 Amendment No.: 171
Unit 4 Amendment No.: 169

**Departure Title:** Pressurizer Surge Line Monitoring Requirement Removal

# **Brief Description of the Plant-Specific Departure:**

This departure removed the requirement for VEGP Units 3&4 to perform the Pressurizer Surge Line Stratification Evaluation.

This departure resulted in changes to the UFSAR (plant-specific DCD) and VEGP Units 3 and 4 COLs.

# **Summary of the Evaluation:**

This departure made changes to UFSAR Tier 2 information that involved a change to the VEGP Units 3 and 4 COLs; therefore, a License Amendment Request (LAR-19-013) was submitted to the NRC.

The NRC approved this License Amendment Request and issued License Amendments 171 and 169 to COL NPF-91 for VEGP Unit 3 and COL NPF-92 for VEGP Unit 4, respectively.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: 172
Unit 4 Amendment No.: 170

**Departure Title:** Spent Fuel Pool Boron Concentration Applicability and Actions

# **Brief Description of the Plant-Specific Departure:**

This change eliminated an allowance to exit the Applicability of Limiting Condition of Operation for Spent Fuel Pool Boron Concentration once a spent fuel pool storage verification had been performed. This change also eliminated the Required Action option to perform a spent fuel pool storage verification in lieu of restoring spent fuel pool boron concentration to within limits.

This activity resulted in changes to COL Appendix A Technical Specifications and Technical Specifications (TS) Bases.

# Summary of the Evaluation:

This departure made a change to the VEGP Units 3 and 4 COL Appendix A Technical Specifications; therefore, a License Amendment Request (LAR-19-012) was submitted to the NRC.

The NRC approved this License Amendment Request and issued License Amendments 172 and 170 to COL NPF-91 for VEGP Unit 3 and COL NPF-92 for VEGP Unit 4, respectively.

The TS Bases changes conform to changes to COL Appendix A Technical Specifications that required prior NRC review and approval. The changes did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

The TS Bases changes did not involve a change to Tier 1 information, Tier 2\* information, or further TS changes. A 10 CFR 52, Appendix D, Section VIII / 50.59 screen/simplified evaluation determined that NRC approval was not required for the TS Bases changes.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** Update Gaseous and Liquid Effluents (GALE) Code Input Parameters

# **Brief Description of the Plant-Specific Departure:**

This departure changed pressurized water reactor Gaseous and Liquid Effluent (GALE) code input parameters based on Liquid Radwaste System (WLS) calculation updates that were previously incorporated into the licensing basis.

This departure resulted in changes to the UFSAR (plant-specific DCD).

# **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** Sleeve Design Change Through Wall W03

# **Brief Description of the Plant-Specific Departure:**

This departure credited the piping sleeve at Wall 11.2 (also known as Wall W03) with maintaining piping stresses within the main steam line break exclusion zone within its acceptance criteria.

This departure resulted in changes to the UFSAR (plant-specific DCD).

# **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** Evaluation of IRWST Hydrogen Concentration Following ADS Blowdown

# **Brief Description of the Plant-Specific Departure:**

The activity revised Tier 2 information in the UFSAR to describe evaluation of a newly postulated but low probability hydrogen combustion event in the In-Containment Refueling Water Storage Tank (IRWST) that could potentially result following actuation of the Automatic Depressurization System (ADS) for a limited timeframe.

This departure resulted in changes to the UFSAR (plant-specific DCD).

# **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** Correction of RCS Fill Description to Align with Tech Spec 3.4.8

# **Brief Description of the Plant-Specific Departure:**

This departure changed the sources used for reactor coolant system filling to align them with the sources allowed by the Technical Specifications.

This departure resulted in changes to the UFSAR (plant-specific DCD).

#### **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/AUnit 4 Amendment No.: N/A

**Departure Title:** Compliance with ASME Section III Code ND-7142 for RNS Valves

V005A/B

# **Brief Description of the Plant-Specific Departure:**

Administrative controls were applied to lock open the normally open normal residual heat removal system (RNS) pumps A and B suction isolation valves and the normally open spent fuel pool cooling system (SFS) suction line isolation valve from the in-containment refueling water storage tank isolation valve. Locking these valves in the open position prevents an overpressure condition in attached RNS and SFS piping.

This departure resulted in changes to the UFSAR (plant-specific DCD).

# **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

**Departure Number:** LDCR-2020-022 **License Amendment:** Yes  $\boxtimes$  No  $\square$ 

Exemption: Yes ⋈ No □

Unit 3 Amendment No.: 175
Unit 4 Amendment No.: 174

**Departure Title:** PCS Wetted Perimeter Test Modification

# **Brief Description of the Plant-Specific Departure:**

This departure modified the performance of the Passive Containment Cooling System (PCS) Wetted Perimeter Test to permit the test at any elevation between elevation 266' and the spring line.

This departure resulted in changes to the UFSAR (plant-specific DCD), Tier 1 (plant-specific DCD), and COL Appendix C ITAAC.

#### **Summary of the Evaluation:**

This departure made changes to Tier 1 information, and UFSAR Tier 2 information that involved a change to or departure from Tier 1 (and associated COL Appendix C); therefore, a License Amendment and Exemption Request (LAR-19-018) was submitted to the NRC.

The NRC approved this License Amendment and Exemption Request and issued License Amendments 175 and 174 to COL NPF-91 for VEGP Unit 3 and COL NPF-92 for VEGP Unit 4, respectively.

**Departure Number:** LDCR-2020-023 **License Amendment:** Yes □ No ⊠

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

Departure Title: Containment Recirculation Cooling System (VCS) Fan A Load

Sequence Change

# **Brief Description of the Plant-Specific Departure:**

This departure changed the time sequence at which containment recirculation Fan A is automatically loaded onto its respective onsite standby diesel generator.

This departure resulted in changes to the UFSAR (plant-specific DCD).

#### **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** Re-design of the PRHR HX Inlet Gas Collection Chamber

# **Brief Description of the Plant-Specific Departure:**

This departure modified the passive residual heat removal (PRHR) heat exchanger (HX) inlet piping high point vent to include additional capacity for gas accumulation. The associated level detectors were relocated to the modified piping.

This departure resulted in changes to the UFSAR (plant-specific DCD).

#### **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** Shield Building Conical Roof Compression Ring Connection

Reinforcement Revised Design

# **Brief Description of the Plant-Specific Departure:**

This departure changed reinforcement at the interface of the passive containment cooling system (PCS) tank, the shield building roof, and compression ring.

This departure resulted in changes to the UFSAR (plant-specific DCD).

# **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/AUnit 4 Amendment No.: N/A

**Departure Title:** CCS Heat Exchanger Flow Rate and Pump Capacity Update

# **Brief Description of the Plant-Specific Departure:**

The flow rates through the component cooling water system pumps and heat exchangers were updated to reflect the finalized design values.

This departure resulted in changes to the UFSAR (plant-specific DCD).

#### **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** Addition of JS21 Radiation Monitoring Package Components to

Safety-Related Component Lists

# **Brief Description of the Plant-Specific Departure:**

Individual components of the nuclear island nonradioactive ventilation system radiation monitoring packages were added to safety-related equipment lists.

This departure resulted in changes to the UFSAR (plant-specific DCD).

# **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes ⋈ No □

Unit 3 Amendment No.: 177
Unit 4 Amendment No.: 176

**Departure Title:** Removal of the Preoperational PRHR Heat Exchanger Natural

**Circulation Test** 

# **Brief Description of the Plant-Specific Departure:**

This departure removed 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), the ITAAC was updated to reflect the heat removal performance test of the PRHR heat exchanger under forced flow conditions.

This departure resulted in changes to the UFSAR (plant-specific DCD), Tier 1 (plant-specific DCD), and COL Appendix C ITAAC.

# **Summary of the Evaluation:**

This departure made changes to Tier 1 information, and UFSAR Tier 2 information that involved a change to or departure from Tier 1 (and associated COL Appendix C); therefore, a License Amendment and Exemption Request (LAR-19-017R1) was submitted to the NRC.

The NRC approved this License Amendment and Exemption Request and issued License Amendments 177 and 176 to COL NPF-91 for VEGP Unit 3 and COL NPF-92 for VEGP Unit 4, respectively.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** Reconciliation of Subcompartment Pressurization Analyses

# **Brief Description of the Plant-Specific Departure:**

This departure revised the description of the short-term compartment pressurization events and results from pipe ruptures. In addition, in support of the updates to the pipe ruptures hazards analysis above, the AP1000 Subcompartment Models descriptions from WCAP-15965 were incorporated.

This departure resulted in changes to the UFSAR (plant-specific DCD).

# **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/AUnit 4 Amendment No.: N/A

**Departure Title:** Correction of WGS Component Source Terms

# **Brief Description of the Plant-Specific Departure:**

The source terms for the gaseous radwaste system (WGS) components were revised. Related radiation zones and other minor radiation zone changes were made. The hydrogen concentration and flow rate values for degasification of the reactor coolant system by WGS were revised.

This departure resulted in changes to the UFSAR (plant-specific DCD).

# **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/AUnit 4 Amendment No.: N/A

**Departure Title:** DAS Actuated AOV Stroke Time Requirement

# **Brief Description of the Plant-Specific Departure:**

This departure changed the closure time, when actuated by the diverse actuation system, of the chemical and volume control system letdown containment isolation valve (inside reactor containment), the liquid radwaste system (WLS) sump discharge containment isolation valve (inside reactor containment), and the WLS sump discharge containment isolation valve (outside reactor containment).

This departure resulted in changes to the UFSAR (plant-specific DCD).

# **Summary of the Evaluation:**

This plant-specific departure did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

# **Southern Nuclear Operating Company**

ND-20-0625

**Enclosure 2** 

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

Tier 2\* Departure Evaluation Report for the Period of November 12, 2019 through May 11, 2020

Tier 2\* Departure Evaluation Report for the Period of November 12, 2019 through May 11, 2020

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** Editorial Changes to the UFSAR

# **Brief Description of the Plant-Specific Departure:**

This activity made Tier 2\* changes categorized as editorial, clarifications, corrections of inconsistencies with the UFSAR, minor corrections to drawings, and incorporation of information submitted to and approved by the NRC.

This departure resulted in changes to the UFSAR (plant-specific DCD).

# **Summary of the Evaluation:**

The Tier 2\* changes were evaluated using the qualifying criteria for Tier 2\* Departure Evaluations, and it was determined that the Tier 2\* changes did not qualify as requiring prior NRC approval in accordance with License Condition 2.D.(13)(a).

An applicability determination determined the Tier 2\* changes were editorial, clarifications, corrections of inconsistencies with the UFSAR, minor corrections to drawings, and incorporation of information submitted to and approved by the NRC. Therefore, a 10 CFR 52 Appendix D, Section VIII screening/simplified evaluation was not required and NRC approval was not required prior to implementing these changes.

Tier 2\* Departure Evaluation Report for the Period of November 12, 2019 through May 11, 2020

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** Updates to References in Current Licensing Basis

# **Brief Description of the Plant-Specific Departure:**

This activity made editorial, clarification, and consistency changes to the presentation of incorporated by reference Westinghouse Topical Report document numbers and titles.

This departure resulted in changes to the UFSAR (plant-specific DCD) and Technical Specifications (TS) Bases.

# **Summary of the Evaluation:**

The plant-specific TS Bases changes did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

The plant-specific TS Bases changes did not involve a change to Tier 1 information, Tier 2\* information, or the TS. A 10 CFR 52 Appendix D, Section VIII screening/simplified evaluation determined that NRC approval was not required prior to implementing these changes.

The Tier 2\* changes were evaluated using the qualifying criteria for Tier 2\* Departure Evaluations, and it was determined that the changes did not qualify as requiring prior NRC approval in accordance with License Condition 2.D.(13)(a).

An applicability determination determined the Tier 2\* changes were editorial, clarifications, and corrections of inconsistencies with the UFSAR. Therefore, a 10 CFR 52 Appendix D, Section VIII screening/simplified evaluation was not required and NRC approval was not required prior to implementing the Tier 2\* changes.

Tier 2\* Departure Evaluation Report for the Period of November 12, 2019 through May 11, 2020

**Departure Number:** LDCR-2020-014 **License Amendment:** Yes □ No ⊠

**Exemption:** Yes  $\square$  No  $\boxtimes$ 

Unit 3 Amendment No.: N/AUnit 4 Amendment No.: N/A

**Departure Title:** Shield Building Roof Reinforcement Modifications

# **Brief Description of the Plant-Specific Departure:**

This departure changed the design of anchor reinforcement of the shield building roof, air inlet, and tension ring.

This departure resulted in changes to the UFSAR (plant-specific DCD).

# **Summary of the Evaluation:**

This activity included departures from Tier 2\* information. These Tier 2\* departures were evaluated using the qualifying criteria for Tier 2\* Departure Evaluations, and it was determined that this activity did not qualify as requiring prior NRC approval in accordance with License Condition 2.D.(13)(a). This departure also involved additional Tier 2 changes that did not involve departures from Tier 2\* material.

This activity also included departures from Tier 2 information. These plant-specific Tier 2 departures did not result in a modification, addition to, or removal of a structure, system, or component (SSC) such that a design function is adversely affected, had no impact on plant operating procedures or a method of control that adversely affects a design function, did not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, did not represent tests or experiments outside the reference bounds of the design basis, and did not alter the assumptions or results of the ex-vessel severe accident assessment.

Tier 2\* Departure Evaluation Report for the Period of November 12, 2019 through May 11, 2020

Exemption: Yes □ No ☒

Unit 3 Amendment No.: N/A Unit 4 Amendment No.: N/A

**Departure Title:** UFSAR Changes to Provide Consistent Use of Man-Machine Interface

Systems Terminology

# **Brief Description of the Plant-Specific Departure:**

This activity made a Tier 2\* change to correct an inconsistency in human system interface resource terminology.

This departure resulted in changes to the UFSAR (plant-specific DCD).

# **Summary of the Evaluation:**

This Tier 2\* change was evaluated using the qualifying criteria for Tier 2\* Departure Evaluations, and it was determined that this change did not qualify as requiring prior NRC approval in accordance with License Condition 2.D.(13)(a).

An applicability determination determined the Tier 2\* change was a correction of an inconsistency within the UFSAR. Therefore, a 10 CFR 52 Appendix D, Section VIII screening/simplified evaluation was not required and NRC approval was not required prior to implementing this change.