

**From:** Lamb, John  
**Sent:** Wednesday, September 9, 2020 7:51 AM  
**To:** Lowery, Ken G.  
**Subject:** Acceptance Review - Vogtle GSI-191 LAR (L-2020-LLA-0182)

**Importance:** High

Ken,

By letter dated August 17, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20230A346), Southern Nuclear Operating Company (SNC, the licensee) submitted a license amendment request (LAR) for Vogtle Electric Generating Plant (Vogtle), Units 1 and 2.

The proposed LAR will revise the licensing basis as described in the Vogtle, Units 1 and 2, Final Safety Analysis Report to allow the use of a risk-informed approach to address safety issues discussed in Generic Safety Issue-191, "Assessment of Debris Accumulation on Pressurized-Water Reactor Sump Performance." In addition, the proposed amendment adds a new Technical Specification (TS) 3.6.7, "Containment Sump," and adds an Action to address the condition of the containment sump made inoperable due to containment accident generated and transported debris exceeding the analyzed limits.

The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this LAR. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an application for an amendment to a license (including the TS) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed LAR in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. If additional information is needed, you will be advised by separate correspondence.

Based on the information provided in your submittal and discussions during the pre-licensing meeting on November 4, 2019 (ADAMS Accession No. ML19296A885), and May 14, 2020 (ADAMS Accession No. ML20136A248), the NRC staff has estimated that this licensing request will take approximately 635 hours to complete. The NRC staff expects to complete this review in approximately 12 months, which is September 2021. If there are emergent complexities or challenges in our review that would cause

changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information (RAI), unanticipated addition of scope to the review, and review by NRC advisory committees or hearing-related activities. Additional delay may occur if the submittal is provided to the NRC in advance or in parallel with industry program initiatives or pilot applications.

If you have any questions, please contact me.

John G. Lamb, Senior Project Manager  
Plant Licensing Branch II-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

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