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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 May 12, 2020 through November 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 May 12, 2020 through November 11, 2020.

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 May 12, 2020 through November 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 C. Chamberlain

Licensing Manager, Regulatory Affairs Southern Nuclear Operating Company

Enclosures

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

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Southern Nuclear Operating Company

ND-20-1325

Enclosure 1

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

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

(This Enclosure consists of 36 pages, including this cover page)

Exemption: Yes \square No \boxtimes

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

Departure Title: Changes in UFSAR Subsections 3.8.3

Brief Description of the Plant-Specific Departure:

This departure changed the CA01 module descriptions in the UFSAR and deleted the discussion on the effective length factor from the design for vertical upward loads section in 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 \square No \boxtimes

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

Departure Title: Licensing Basis Value Inconsistencies With Plant Parameters

Brief Description of the Plant-Specific Departure:

This departure made updates to reflect as designed values relating to steam generator nominal design parameters and best estimate reactor core and vessel thermal-hydraulic parameters.

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/AUnit 4 Amendment No.: N/A

Departure Title: Nuclear Island Door Swing Path DCD Tier 2 Figure Updates

Brief Description of the Plant-Specific Departure:

This departure changed door swing directions in UFSAR (plant-specific DCD) Figures in Chapters 1, 6, 9A and 12 to match the design documents.

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-2019-134 **License Amendment:** Yes \boxtimes No \square

Exemption: Yes \boxtimes No \square

Unit 3 Amendment No.: 181
Unit 4 Amendment No.: 180

Departure Title: Design Changes to Address Heatup of Auxiliary Building Rooms

following Loss of HVAC or Loss of all A/C Power

Brief Description of the Plant-Specific Departure:

This departure addressed potential effects within AP1000 Auxiliary Building spaces following a loss of heating, ventilation, and air conditioning (HVAC) or loss of ac power events. Changes were made to heat load values, room temperatures, room heat-up rate changes, and loss of HVAC event durations. For loss of HVAC events of longer duration, compensatory actions were added and passive heat sinks were credited to limit the temperatures to within those considered for environmental qualification of the equipment.

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

Summary of the Evaluation:

Portions of 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-19-010) was submitted to the NRC.

The NRC approved this License Amendment and Exemption Request and issued License Amendments 181 and 180 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.

These portions of this 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 screening/simplified evaluation determined that NRC approval was not required prior to implementing this departure.

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.

Exemption: Yes \square No \boxtimes

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

Departure Title: NL-1335 non-IST Program Updates

Brief Description of the Plant-Specific Departure:

This departure modified Technical Specifications (TS) Bases to correct the ASME OM code paragraph reference to ISTC-5260, and to remove detail that is redundant with the requirements in the COL License Condition 2.D.(12)(g)10.b. TS Bases for SR 3.7.2.1, SR 3.7.2.2, and SR 3.7.3.1 were revised to more accurately describe the associated TS SR Note.

This departure resulted in changes to the TS Bases.

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-2020-016 **License Amendment:** Yes \boxtimes No \square

Exemption: Yes ⊠ No □

Unit 3 Amendment No.: 182
Unit 4 Amendment No.: N/A

Departure Title: Unit 3 Auxiliary Building Wall 11 Seismic Gap Requirements

Brief Description of the Plant-Specific Departure:

This departure modified the north-south seismic gap requirement above grade between the nuclear island and the annex building, west of Column Line I, from Elevation 141' through Elevation 154'.

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

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 VEGP 3&4 Tier 1 (and associated COL Appendix C) information; therefore, a License Amendment and Exemption Request (LAR-20-001) was submitted to the NRC.

The NRC approved this License Amendment and Exemption Request and issued License Amendment 182 to COL NPF-91 for VEGP Unit 3.

Exemption: Yes \square No \boxtimes

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

Departure Title: Power Lockout Changes for PXS-PL-V002A/B during Power

Brief Description of the Plant-Specific Departure:

This departure implemented power lockout to the core makeup tank balance line inlet motor operated valves during normal operation.

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/AUnit 4 Amendment No.: N/A

Departure Title: Main Steam System Turbine Bypass Control Logic to Protect Condenser

Internals

Brief Description of the Plant-Specific Departure:

This departure adjusted the main steam system turbine bypass valve actuators to limit the full open valve stroke. The UFSAR text which mentions the limit was revised to clarify that the capacity is up to this limit.

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-2020-040 **License Amendment:** Yes \boxtimes No \square

Exemption: Yes \square No \boxtimes

Unit 3 Amendment No.: 185 Unit 4 Amendment No.: 183

Departure Title: Core Makeup Tank Boron Concentration Requirements

Brief Description of the Plant-Specific Departure:

This departure increased the upper limit of the Core Makeup Tank (CMT) boron concentration and decreased the frequency of the Technical Specifications Surveillance Requirement for verifying CMT boron concentration. This departure also increased the minimum mass of trisodium phosphate required.

This departure resulted in changes to the UFSAR (plant-specific DCD), COL Appendix A Technical Specifications (TS), and 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-20-004) was submitted to the NRC.

The NRC approved this License Amendment Request and issued License Amendments 185 and 183 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 methods 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 \square No \boxtimes

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

Departure Title: TS Bases 3.5.4, Required Actions F.1 and F.2 Notes

Brief Description of the Plant-Specific Departure:

The Technical Specifications (TS) Bases were revised to provide additional clarity of the options for providing redundant means of cooling the reactor coolant system.

This departure resulted in changes to the TS Bases.

Summary of the Evaluation:

This plant-specific Technical Specifications Bases change activity 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-2020-051 **License Amendment:** Yes □ No ⊠

Exemption: Yes \square No \boxtimes

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

Departure Title: TRM 3.6.1 & TRM 3.8.3 Updates for Post-72 Hour Functions

Brief Description of the Plant-Specific Departure:

This departure revised Technical Requirements Manual (TRM) 3.6.1 and TRM 3.8.3 Applicability to exclude the passive containment cooling water storage tank makeup function when reactor decay heat is sufficiently low (TRM 3.6.1 only) and to account for handling irradiated fuel in the event the reactor is defueled (i.e., "no MODE").

This departure resulted in changes to Tier 2 portions of the Technical Requirements Manual (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 \square No \boxtimes

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

Departure Title: Missed Licensing Basis Impact to the DCD/UFSAR

Brief Description of the Plant-Specific Departure:

This departure added diesel fuel oil tanks to the Vogtle 3&4 site.

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-2020-057 **License Amendment:** Yes \boxtimes No \square

Exemption: Yes \square No \boxtimes

Unit 3 Amendment No.: 183 Unit 4 Amendment No.: 181

Departure Title: Main Control Room Emergency Habitability System (VES) Pressure

Regulating Valve and Source Range Neutron Flux Doubling Surveillance Changes, and Other Miscellaneous Technical Specification Changes

Brief Description of the Plant-Specific Departure:

This activity made a variety of changes to the Technical Specifications (TS), including:

- Changed the frequency of Surveillance Requirement (SR) for the Main Control Room Emergency Habitability System (VES) operation to a staggered basis,
- Deleted the SR for verifying the self-contained pressure regulating valve in each VES air delivery flow path is operable in accordance with the Inservice Testing Program (IST),
- Excluded neutron detectors from Engineered Safety Feature Actuation System Instrumentation SR for channel calibration and engineered safety feature response time,
- Replaced details of the Inservice Testing Program (IST) in the Technical Specifications with a reference to the IST Program,
- Editorially revised TS 5.5.9 for consistency and appropriate reference to the applicable UFSAR section, and
- Replaced an instance of rated thermal power (RTP) in TS 3.4.9 where simply "thermal power" was intended.

This activity resulted in changes to COL Appendix A Technical Specifications and the Technical Specifications Bases.

Summary of the Evaluation:

This departure made changes to COL Appendix A Technical Specifications; therefore, a License Amendment Request (LAR-20-002) was submitted to the NRC.

The NRC approved this License Amendment Request and issued License Amendments 183 and 181 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.: 184
Unit 4 Amendment No.: 182

Departure Title: Technical Specification 3.3.13 for Main Control Room Emergency

Habitability System (VES) Instrumentation Applicability Change and

Include Undervoltage Actuation

Brief Description of the Plant-Specific Departure:

This departure revised UFSAR Chapter 7 to identify which equipment is de-energized by the Class 1E 24-hour battery charger undervoltage function, clarify undervoltage logic, and credit the de-energization of the sample pumps with not only conserving battery capacity but also maintaining room temperature below the equipment qualification limits and maintaining the assumed heat load for main control room (MCR) habitability. These changes also involved changes to the Technical Specifications (TS) and TS Bases.

A separate consistency change to the TS Bases was included in this departure. The change addressed an instance in which the TS Bases referred to a specific Technical Specification by title, but the title did not match the TS.

This departure resulted in changes to the UFSAR (plant-specific DCD), COL Appendix A Technical Specifications, and 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-20-003) was submitted to the NRC.

The NRC approved this License Amendment Request and issued License Amendments 184 and 182 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. A separate consistency change was also included in this activity and was subjected to a 10 CFR 52, Appendix D, Section VIII / 50.59 screen/simplified evaluation 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 methods 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 \square No \boxtimes

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

Departure Title: Plant Fire Alarm System Remote Annunciator Panel Moved, and

Containment Fire Alarm Changed from Audible to Visual

Brief Description of the Plant-Specific Departure:

This departure changed the location of the remote fire alarm annunciator panel from the security central alarm station to an unspecified remote location outside of the main control room, and the audible notification appliances inside containment were changed to visual notification appliances.

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: UFSAR Chapter 19E.4.10 Update: Safe Shutdown Temperature

Evaluation

Brief Description of the Plant-Specific Departure:

This departure revised the safe shutdown evaluation to update the time when the passive residual heat removal (PRHR) heat transfer matches decay heat, the time when cold leg temperature in the PRHR loop is reduced to 420°F, and the time when core average temperature reaches 420°F.

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-2020-067 **License Amendment:** Yes □ No ⊠

Exemption: $Yes \square No \boxtimes$

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

Departure Title: PMS FMEA for SR and IR Neutron Detectors

Brief Description of the Plant-Specific Departure:

This departure revised the UFSAR Appendix 7B Protection and Safety Monitoring System (PMS) Failure Modes and Effects Analysis (FMEA) to change the failure Detectability classes for the Source Range (SR) and Intermediate Range (IR) components.

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: Adopt Regulatory Guide 1.189 Rev. 1 Criterion for Unexposed

Penetration Seal Temperature

Brief Description of the Plant-Specific Departure:

This departure changed UFSAR Table 9.5.1-1, "AP1000 Fire Protection Program Compliance with BTP CMEB 9.5-1," C.5.a(3)(b) and incorporated by reference (IBR) document WCAP-15871, "AP1000 Assessment Against NFPA-804," to allow the use of an Alternate Compliance (AC) criterion consistent with Regulatory Guide (RG) 1.189, Revision 1, Section 4.2.1.5.b.ii, for determining the acceptability of unexposed penetration seal temperatures for qualifying penetrations. Additional changes were made to UFSAR Tables 1.6-1 and 1.9-1, Appendix 1A, and Subsection 9.5.5 to conform to the changes in UFSAR Table 9.5.1-1 and WCAP-15871.

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-2020-071 **License Amendment:** Yes □ No ⊠

Exemption: Yes \square No \boxtimes

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

Departure Title: Updates to Appendix 9A Due to Reconciliation of Fire Protection

Analysis Report

Brief Description of the Plant-Specific Departure:

This departure changed UFSAR Appendix 9A to resolve discrepancies from approved design changes and calculations and to reflect the finalization of the Fire Protection Analysis Report.

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-2020-072 **License Amendment:** Yes □ No ⊠

Exemption: Yes \square No \boxtimes

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

Departure Title: RCS Design Transient Loop 2 Temperature Changes

Brief Description of the Plant-Specific Departure:

This departure made a change to allow an alternative combination of reactor coolant system depressurization transients when evaluating component fatigue for reactor coolant pressure boundary components other than the steam generators (SGs). The alternative depressurization transient combination was already allowed for the SGs.

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-2020-074 **License Amendment:** Yes □ No ⊠

Exemption: $Yes \square No \boxtimes$

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

Departure Title: Exceptions to Regulatory Guide 1.143 for the Steam Generator

Blowdown System (BDS) Electrodeionization (EDI) Packages

Brief Description of the Plant-Specific Departure:

This departure identified exceptions to Regulatory Guide (RG) 1.143 for the Steam Generator Blowdown System (BDS) in UFSAR (plant-specific DCD) Appendix 1A. This activity also revised the UFSAR Chapter 10 BDS design basis discussion to indicate conformance and exceptions to RG 1.143 are discussed in Appendix 1A including that BDS does not normally contain radioactivity except in the infrequent event of primary to secondary tube leakage.

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-2020-075 **License Amendment:** Yes □ No ⊠

Exemption: Yes \square No \boxtimes

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

Departure Title: Change to Load Regulation Requirements

Brief Description of the Plant-Specific Departure:

This departure reduced the number of reactor coolant system component cycles resulting from operating in load regulation mode to reflect that load regulation mode will not be in continuous use.

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-2020-076 **License Amendment:** Yes □ No ⊠

Exemption: $Yes \square No \bowtie$

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

Departure Title: Implementation of AP1000 Electrical Penetration Retaining Ring for

Vogtle 3 and 4

Brief Description of the Plant-Specific Departure:

This departure made a change to depict a new ASME Section III, Division 1 - Subsection NE, Class MC retaining ring around the outside of the containment vessel penetration to electrical penetration assembly extension sleeve weld joint.

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: VBS Ancillary Fan Flow Path Clarifications

Brief Description of the Plant-Specific Departure:

This departure made changes to the flow path for post-72 hour cooling for the MCR ancillary fan, including the opening of doors, opening of access panels, and assembly of flexible ductwork for the operating ancillary fan.

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: VBS and VFS ASME N510 Surveillance Testing Corrections

Brief Description of the Plant-Specific Departure:

This departure added a clarification note in UFSAR Appendix 1A under Reg. Guide 1.140, Rev. 2 to ASME N510-1989 regarding testing of the nuclear island nonradioactive ventilation system and containment air filtration system filtration units.

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-2020-083 **License Amendment:** Yes □ No ⊠

Exemption: Yes \square No \boxtimes

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

Departure Title: Turbine Building Fire Area Drawing Inconsistencies

Brief Description of the Plant-Specific Departure:

This departure implemented an upgrade of the fire protection of turbine building rooms and annex building rooms to extend 1-hour and 2-hour rated fire protection walls of affected rooms in accordance with the applicable codes.

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: AP1000 Standard Plant Yard Finalization

Brief Description of the Plant-Specific Departure:

This departure changed site layout information to reflect the finalized site layout. Changes included increasing the size of the service water system basin, moving the main generator excitation transformer from inside the turbine building to the yard, resizing the transformers enclosures, relocating the condensate storage tank, and revising the layout of plant roads.

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: UFSAR Corrections Pertaining to Regulatory Guide (RG) 1.52

Brief Description of the Plant-Specific Departure:

This departure made editorial and administrative changes within the licensing basis to correct the title of Regulatory Guide (RG) 1.52 Rev. 3 and to correct the RG 1.52 regulatory position numbers referenced in UFSAR Appendix 1A.

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

Summary of the Evaluation:

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

Departure Number: LDCR-2020-087 **License Amendment:** Yes □ No ⊠

Exemption: $Yes \square No \boxtimes$

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

Departure Title: Tornado and Hurricane Missile Assessment of Seismic II Structures

Brief Description of the Plant-Specific Departure:

This departure revised the protection of ancillary diesel generator functions from hurricanes in UFSAR Chapter 8; identified additional tornado missile barriers for auxiliary building components described in UFSAR Chapter 3; and revised the tornado missile barrier materials described in UFSAR Chapter 3.

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: CAS Pressure Increase

Brief Description of the Plant-Specific Departure:

The departure removed the check valves from the outlet of the dryer packages of the compressed and instrument air system (CAS), relocated the auto-drainer function from the air receivers of the CAS to the air dryers, and relocated of the self-contained breathing apparatus refill station from the annex building to the turbine building (with associated piping changes).

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/AUnit 4 Amendment No.: N/A

Departure Title: Spent Fuel Pool Weir Gate Seals Safety Function Requirement

Brief Description of the Plant-Specific Departure:

This departure revised UFSAR Table 3.11-1 to include a Note stating that the Engineered Safety Feature (ESF) function is not required unless irradiated fuel is stored in the spent fuel pool (SFP), and to further clarify that the ESF function of leakage prevention from the SFP may also be met by maintaining equivalent water pressure (level) on the opposite side of the gate seal. The Table 3.11-1 Note applies to the ESF function of the spent fuel transfer gate and the spent fuel cask loading pit gate.

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: Fire Detection - Auxiliary Building and Annulus Radiological Area

Brief Description of the Plant-Specific Departure:

This departure removed fire and smoke detectors from rooms where they were evaluated to be unnecessary, based on the fire detection methodology currently described in 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.

Departure Number: LDCR-2020-097 **License Amendment:** Yes □ No ⊠

Exemption: Yes \square No \boxtimes

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

Departure Title: Standby Diesel Fuel Oil System (DOS) Leakage Detection Modification

Brief Description of the Plant-Specific Departure:

This departure added sensor probes (in lieu of continuous hydrocarbon sensors) to low point drains within the containment piping system in the below-grade diesel fuel oil system (DOS) piping to meet the one-hour response time requirement of 40 CFR 280.44(a) for leakage detection. This departure revised a note on the UFSAR Figures depicting the involved piping, to state that leak detection sensors are inside the containment pipes.

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: Annex Area 4 Extension Redesign

Brief Description of the Plant-Specific Departure:

This departure modified Office Area East and Office Area West in the annex building to include additional rooms to support plant operations and maintenance activities.

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-20-1325

Enclosure 2

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

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

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

Exemption: $Yes \square No \bowtie$

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

Departure Title: Deletion of UFSAR Appendix 7A and Addition of Latest Chapter 7 IBR

Documents to UFSAR Table 1.6-1

Brief Description of the Plant-Specific Departure:

This activity updated the UFSAR to clarify incorporated-by-reference (IBR) content and include the current revisions to IBR documents in UFSAR Chapter 7. This activity also updated the design descriptions in IBR reports to clarify how the AP1000 protection and safety monitoring system implements password access using the operating system in the Maintenance and Test Panel and to remove the statement that the software load enable keyswitch disconnects the safety flash disk.

This departure resulted in changes to the UFSAR (plant-specific DCD), including incorporated by reference documents, and the Technical Specifications Bases.

Summary of the Evaluation:

This departure included departures from Tier 2* information in the UFSAR (plant-specific DCD), including incorporated by reference documents. These Tier 2* changes were evaluated using the qualifying criteria for Tier 2* Departure Evaluations, and it was determined that this activity does 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 plant-specific departure and the Technical Specifications Bases change activity 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 result in an adverse change to a method of evaluation or use of an alternate 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 departure and activity did not involve a change to plant-specific Tier 1 information or the Technical Specifications. A 10 CFR 52 Appendix D Section VIII screening determined that NRC approval is not required prior to implementing this departure.

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

Departure Number: LDCR-2019-147 **License Amendment:** Yes \boxtimes No \square

Exemption: Yes \square No \boxtimes

Unit 3 Amendment No.: 180
Unit 4 Amendment No.: 179

Departure Title: Environmental Conditions for Inputs to Civil/Structural Design (Licensing

Basis) Discrepancies Between UFSAR Structural Tables and Calcs

Brief Description of the Plant-Specific Departure:

This departure changed the normal thermal loads for the passive containment cooling system (PCS) tank, changed the accident thermal loads for the exterior walls below grade and basemat in the auxiliary building, and updated the critical section tables for the auxiliary building basemat, concrete walls, and floors, the shield building roof, and the spent fuel pool west wall.

This departure also changed the main steam isolation valve room accident air and concrete temperatures during the main steam line break for consistency within the UFSAR and the current design evaluations. In addition, this activity also made changes to clarify that the accident temperatures for auxiliary building insulated roofs are specifically for areas above the fuel handling area and clarified the temperatures assumed on the exterior walls above ground surrounded by the adjacent building. Furthermore, this activity made changes to the accident temperatures on the shield building wall between the upper annulus and auxiliary building.

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

Summary of the Evaluation:

Portions of this departure made changes to UFSAR Tier 2 information that involved 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 Request (LAR-19-019) was submitted to the NRC.

The NRC approved this License Amendment Request and issued License Amendments 180 and 179 to COL NPF-91 for VEGP Unit 3 and COL NPF-92 for VEGP Unit 4, respectively. Portions of this departure included departures from Tier 2* information and changes to Tier 2 information in the UFSAR (plant-specific DCD) that involved these Tier 2* departures. These Tier 2* changes and involved Tier 2 changes were evaluated using the qualifying criteria for Tier 2* Departure Evaluations, and it was determined that this activity does 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.

The 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, has no impact on plant operating procedures or a method of control that adversely affects a design function, does not result in an adverse change to a method of evaluation or use of an alternate method of evaluation, does not represent tests or experiments outside the reference bounds of the design basis, and does not alter the assumptions or results of the ex-vessel severe accident assessment.

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

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

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

Exemption: $Yes \square No \boxtimes$

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

Departure Title: Missing Tie Bars in 2' Thick Shield Building Roof at Vogtle Unit 3

Brief Description of the Plant-Specific Departure:

This departure changed the design of crosstie reinforcement in the shield building roof adjacent to the passive containment cooling system tank exterior wall for Vogtle Unit 3.

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

Summary of the Evaluation:

This departure included departures from Tier 2* information in the UFSAR (plant-specific DCD). These Tier 2* changes 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 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, has no impact on plant operating procedures or a method of control that adversely affects a design function, does not result in a revision or replacement to a method of evaluation used in establishing design bases or in the safety analysis, does not represent tests or experiments outside the reference bounds of the design basis, and does not alter the assumptions or results of the ex-vessel severe accident assessment.

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

Exemption: $Yes \square No \bowtie$

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

Departure Title: Missing Rebar in Wall 7.3 El. 135'-3" and 155'-6" at Vogtle Unit 4

Brief Description of the Plant-Specific Departure:

This departure changed the design of horizontal reinforcement in Wall 7.3 between Elevation 135'-3" and Elevation 155'-6" of Vogtle Unit 4.

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

Summary of the Evaluation:

This departure included departures from Tier 2* information in the UFSAR (plant-specific DCD). These Tier 2* changes were evaluated using the qualifying criteria for Tier 2* Departure Evaluations, and it was determined that this activity does not qualify as requiring prior NRC approval in accordance with License Condition 2.D.(13)(a).

This plant-specific departure 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 result in a revision to a method of evaluation or a replacement to 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 departure did not involve a change to plant-specific Tier 1 information, Tier 2* information that requires a license amendment, or the Technical Specifications. A 10 CFR 52 Appendix D Section VIII screening determined that NRC approval is not required prior to implementing this departure.

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

Exemption: $Yes \square No \bowtie$

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

Departure Title: U3 Shield Building Roof Lower Concrete Strength

Brief Description of the Plant-Specific Departure:

This departure identified that localized areas of the Vogtle Unit 3 shield building conical roof may have a concrete compressive strength lower than 6,000 psi between Azimuth 90 degrees and 270 degrees from Elevation 272'-11/16" to Elevation 293'-9".

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

Summary of the Evaluation:

This departure included departures from Tier 2* information in the UFSAR (plant-specific DCD). The Tier 2* change was evaluated using the qualifying criteria for Tier 2* Departure Evaluations, and it was determined that this activity does not qualify as requiring prior NRC approval in accordance with License Condition 2.D.(13)(a).

This plant-specific departure 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 result in a revision to a method of evaluation or a replacement to 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 departure did not involve a change to plant-specific Tier 1 information, Tier 2* information that requires a license amendment, or the Technical Specifications. A 10 CFR 52 Appendix D Section VIII screening determined that NRC approval is not required prior to implementing this departure.