

October 21, 2021

Docket Nos.: 50-348 50-424
 50-364 50-425

NL-21-0930

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555-0001

Southern Nuclear Operating Company
Joseph M. Farley Nuclear Plant - Units 1 and 2
Vogtle Electric Generating Plant - Units 1 and 2

Supplement to Application to Revise Technical Specifications to Adopt
TSTF 577, "Revised Frequencies for Steam Generator Tube Inspections"

Ladies and Gentlemen:

On September 17, 2021 (ML21263A223), pursuant to 10 CFR 50.90, Southern Nuclear Operating Company (SNC) requested amendments to the licenses for Joseph M. Farley Nuclear Plant (FNP), Units 1 and 2, and Vogtle Electric Generating Plant (VEGP), Units 1 and 2. The license amendment request (LAR) proposed adoption of TSTF 577, "Revised Frequencies for Steam Generator Tube Inspections," which is an approved change to the Standard Technical Specifications (STS), into the FNP, Units 1 and 2, and VEGP, Units 1 and 2, TS.

Subsequent to the submittal, it was identified that the markups and clean-typed pages for VEGP and FNP did not match the TSTF-577 template punctuation, and that some clean TS pages were omitted from the original submittal. Specifically, the clean TS page 5.5-8 for the Farley Unit 1 and 2 TS in Attachment 2a and the clean TS page 5.5-10 for the Vogtle Unit 1 and 2 TS in Attachment 2b had been omitted from the original submittal. In addition, a semicolon was added at the end paragraph c.4 for the Farley and Vogtle TS 5.6.10, where a period should be.

Attachments 1a and 1b provide marked-up TS pages for FNP and VEGP, respectively, and Attachment 2a and 2b provide clean-typed TS pages for FNP and VEGP, respectively. These pages replace those in the original request that are affected by this supplemental request.

SNC requests the same approval and implementation schedule as requested in its original application. The conclusions of the No Significant Hazards Consideration Determination and Environmental Consideration contained in the original application have been reviewed and are unaffected by this supplement.

This letter contains no regulatory commitments.

In accordance with 10 CFR 50.91, SNC is notifying the State of Alabama and the State of Georgia of this supplement to license amendment request by transmitting a copy of this letter and enclosure to the designated State Officials.

If you have any questions, please contact Ryan Joyce at 205.992.6468.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 21st day of October 2021.

Respectfully submitted,



Cheryl A. Gayheart
Regulatory Affairs Director
Southern Nuclear Operating Company

CAG/dsp/cbg

Attachments: 1a FNP Revised Technical Specification Page (Mark-up)
1b VEGP Revised Technical Specification Page (Mark-up)
2a FNP Revised Technical Specification Pages
2b VEGP Revised Technical Specification Pages

cc: NRC Regional Administrator, Region II
NRC Project Manager – Farley 1 & 2
NRC Project Manager – Vogtle 1 & 2
NRC Senior Resident Inspector – Farley 1 & 2
NRC Senior Resident Inspector – Vogtle 1 & 2
Director, Alabama Office of Radiation Control
Director, Environmental Protection Division – State of
Georgia RType: CGA02.001

**Southern Nuclear Operating Company
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Attachment 1a

FNP Revised Technical Specification Page (Mark-up)

5.6 Reporting Requirements

5.6.7 EDG Failure Report

If an individual emergency diesel generator (EDG) experiences four or more valid failures in the last 25 demands, these failures shall be reported within 30 days. Reports on EDG failures shall include a description of the failures, underlying causes, and corrective actions taken per the Emergency Diesel Generator Reliability Monitoring Program.

5.6.8 PAM Report

When a report is required by Condition B or F of LCO 3.3.3, "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

5.6.9 Deleted

5.6.10 Steam Generator (SG) Tube Inspection Report

A report shall be submitted within 180 days after the initial entry into MODE 4 following completion of an inspection performed in accordance with the Specification 5.5.9, "Steam Generator (SG) Program." The report shall include:

- a. The scope of inspections performed on each SG;
- b. The nondestructive examination techniques utilized for tubes with increased degradation susceptibility;**
- c. For each degradation mechanism found:**
 - 1. The nondestructive examination techniques utilized;**
 - 2. The location, orientation (if linear), measured size (if available), and voltage response for each indication. For tube wear at support structures less than 20 percent through-wall, only the total number of indications needs to be reported;**
 - 3. A description of the condition monitoring assessment and results, including the margin to the tube integrity performance criteria and comparison with the margin predicted to exist at the inspection by the previous forward-looking tube integrity assessment; and**
 - 4. The number of tubes plugged during the inspection outage.**

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Attachment 1b

VEGP Revised Technical Specification Page (Mark-up)

5.6 Reporting Requirements

5.6.9 Deleted.

5.6.10 Steam Generator Tube Inspection Report

A report shall be submitted within 180 days after the initial entry into MODE 4 following completion of an inspection performed in accordance with the Specification 5.5.9, "Steam Generator (SG) Program." The report shall include:

- a. The scope of inspections performed on each SG;
- b. The nondestructive examination techniques utilized for tubes with increased degradation susceptibility;**
- c. For each degradation mechanism found:**
 - 1. The nondestructive examination techniques utilized;**
 - 2. The location, orientation (if linear), measured size (if available), and voltage response for each indication. For tube wear at support structures less than 20 percent through-wall, only the total number of indications needs to be reported;**
 - 3. A description of the condition monitoring assessment and results, including the margin to the tube integrity performance criteria and comparison with the margin predicted to exist at the inspection by the previous forward-looking tube integrity assessment; and**
 - 4. The number of tubes plugged during the inspection outage.**
- ~~b. Degradation mechanisms found,~~
- ~~c. Nondestructive examination techniques utilized for each degradation mechanism,~~
- ~~d. Location, orientation (if linear), and measured sizes (if available) of service induced indications,~~
- ~~e. Number of tubes plugged during the inspection outage for each degradation mechanism,~~
- ef. The number and percentage of tubes plugged to date, and the effective plugging percentage in each SG steam generator;**

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Attachment 2a

FNP Revised Technical Specification Pages

5.5 Programs and Manuals

5.5.10 Secondary Water Chemistry Program

This program provides controls for monitoring secondary water chemistry to inhibit SG tube degradation. The program shall include:

- a. Identification of a sampling schedule for the critical variables and control points for these variables;
- b. Identification of the procedures used to measure the values of the critical variables;
- c. Identification of process sampling points, which shall include monitoring the condenser hotwells for evidence of condenser in leakage;
- d. Procedures for the recording and management of data;

(continued)

5.6 Reporting Requirements

5.6.7 EDG Failure Report

If an individual emergency diesel generator (EDG) experiences four or more valid failures in the last 25 demands, these failures shall be reported within 30 days. Reports on EDG failures shall include a description of the failures, underlying causes, and corrective actions taken per the Emergency Diesel Generator Reliability Monitoring Program.

5.6.8 PAM Report

When a report is required by Condition B or F of LCO 3.3.3, "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

5.6.9 Deleted

5.6.10 Steam Generator (SG) Tube Inspection Report

A report shall be submitted within 180 days after the initial entry into MODE 4 following completion of an inspection performed in accordance with the Specification 5.5.9, "Steam Generator (SG) Program." The report shall include:

- a. The scope of inspections performed on each SG;
- b. The nondestructive examination techniques utilized for tubes with increased degradation susceptibility;
- c. For each degradation mechanism found:
 1. The nondestructive examination techniques utilized;
 2. The location, orientation (if linear), measured size (if available), and voltage response for each indication. For tube wear at support structures less than 20 percent through-wall, only the total number of indications needs to be reported;
 3. A description of the condition monitoring assessment and results, including the margin to the tube integrity performance criteria and comparison with the margin predicted to exist at the inspection by the previous forward-looking tube integrity assessment; and
 4. The number of tubes plugged during the inspection outage.

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Attachment 2b

VEGP Revised Technical Specification Pages

5.5 Programs and Manuals

5.5.10 Secondary Water Chemistry Program

This program provides controls for monitoring secondary water chemistry to inhibit SG tube degradation. The program shall include:

(continued)

5.6 Reporting Requirements

5.6.9 Deleted.

5.6.10 Steam Generator Tube Inspection Report

A report shall be submitted within 180 days after the initial entry into MODE 4 following completion of an inspection performed in accordance with the Specification 5.5.9, "Steam Generator (SG) Program." The report shall include:

- a. The scope of inspections performed on each SG;
- b. The nondestructive examination techniques utilized for tubes with increased degradation susceptibility;
- c. For each degradation mechanism found:
 1. The nondestructive examination techniques utilized;
 2. The location, orientation (if linear), measured size (if available), and voltage response for each indication. For tube wear at support structures less than 20 percent through-wall, only the total number of indications needs to be reported;
 3. A description of the condition monitoring assessment and results, including the margin to the tube integrity performance criteria and comparison with the margin predicted to exist at the inspection by the previous forward-looking tube integrity assessment; and
 4. The number of tubes plugged during the inspection outage.
- d. An analysis summary of the tube integrity conditions predicted to exist at the next scheduled inspection (the forward-looking tube integrity assessment) relative to the applicable performance criteria, including the analysis methodology, inputs, and results;
- e. The number and percentage of tubes plugged to date, and the effective plugging percentage in each SG;
- f. The results of any SG secondary side inspections;
- g. The primary to secondary LEAKAGE rate observed in each SG (if it is not practical to assign the LEAKAGE to an individual SG, the entire primary to secondary LEAKAGE should be conservatively assumed to be from one SG) during the cycle preceding the inspection which is the subject of the report;

(continued)