

## UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

August 10, 2022

Mr. Brian H. Whitley, Director Regulatory Affairs Southern Nuclear Operating Company, Inc. 3535 Colonnade Parkway, Bin N-226-EC Birmingham, AL 35243

## SUBJECT: REQUEST FOR COMMENT ON AP1000 STANDARD TECHNICAL SPECIFICATIONS – DRAFT NUREG-2194, REVISION 1, VOLUMES 1 AND 2

Dear Mr. Whitley:

Enclosed are PDF files representing the draft of Revision 1 of NUREG-2194, "Standard Technical Specifications Westinghouse Advanced Passive 1000 (AP1000) Plants," to both Volume 1, "Specifications," and Volume 2, "Bases" (AP1000 STS). This revision is consistent with changes made to the plant-specific technical specifications and bases for Vogtle Electric Generating Plant, Units 3 and 4, through combined operating license (COL) Amendment Nos. 186 and 184, respectively, and Bases Revision 68, the last amendments that affected the plant-specific technical specifications. This draft revision also incorporates applicable changes to the Westinghouse Electric Company's STS approved in the industry owners groups' Technical Specifications Task Force (TSTF) travelers and includes TSTF-529 and TSTF-565. Note that certain technical specification risk-informed initiatives continue to be deferred from consideration; these are TSTF-359, TSTF-425, and TSTF-505.

We are requesting comments from AP1000 plant COL holders on the draft of Revision 1 of the AP1000 STS to provide assurance that any technical inaccuracies are identified and corrected. We have elected to not solicit comments on the draft of Revision 1 of NUREG-2194 from the general public because all significant changes are consistent with licensing basis changes described in publicly available documents in the U.S. Nuclear Regulatory Commission's Agencywide Documents Access and Management System, either in the docket files for Vogtle Electric Generating Plant, Units 3 and 4, or in correspondence with the Technical Specifications Task Force for changes to AP1000 STS derived from operating reactor STS NUREG changes in NRC-approved TSTF travelers.

The recent update to the Final Safety Analysis Report for Vogtle Electric Generating Plant, Units 3 and 4, included Bases Revision 70, which affected the following plant-specific Technical Specifications Bases Subsections:

B 3.1.9	B 3.3.7	B 3.3.12	B 3.3.20
B 3.3.1	B 3.3.8	B 3.3.13	B 3.5.2
B 3.3.2	B 3.3.9	B 3.3.14	B 3.5.4
B 3.3.3	B 3.3.10	B 3.3.15	B 3.6.7
B 3.3.4	B 3.3.11	B 3.3.16	

No Bases subsections were marked as having been revised by Revision 69. The changes associated with Revision 70 appear to be unrelated to specific COL amendments. Please provide a comment about including these changes in draft Revision 1 of Volume 2 of NUREG-2194, and if you feel the changes should be included, please describe why they are beneficial.

We welcome your comments on all sections of the draft Revision 1 of the AP1000 STS and request you pay special attention to Bases Sections B 3.1, B 3.2, B 3.3, and B 3.7. We plan to publish Revision 1 of the AP1000 STS in the near future. Therefore, please forward your comments in reply to this letter by September 30, 2022, if possible, and if not please inform us of your best date.

This work is not directly charged to your docket but is included in the general overhead for new reactor guidance. If you have any questions, please contact Cayetano Santos, Jr., Senior Project Manager, at (301) 415-7270 or Cayetano.Santos@nrc.gov.

Sincerely,

Philip 6. D'Bryan, Philip signing on behalf of Hall, Victor on 08/10/22

Victor E. Hall, Chief Vogtle Project Office Office of Nuclear Reactor Regulation

Docket Nos. 52-025, 52-026

License Nos. NPF-91, NPF-92

Enclosures: As stated

cc: Wes Sparkman

B. Whitley

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Letter to B. Whitley, SNC, Request for Comment on NUREG-2194 STS Westinghouse Advanced Passive 1000 Plants DATE August 10, 2022

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