

## Zach Turner

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**From:** Zach Turner  
**Sent:** Tuesday, May 30, 2023 8:59 AM  
**To:** Pournaras, DeLisa S.  
**Cc:** Ed Miller; John Lamb; ACCHAMBE@southernco.com; KGLOWERY@southernco.com  
**Subject:** Acceptance Review-Vogtle, Units 1 and 2-Proposed LAR and Relief Request to Revise TS 3.4.14.1 and IST ALT-VR-02 (EPIDS L-2023-LLA-0061 and L-2023-LLR-0023)

DeLisa,

By letter dated May 1, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23121A267), Southern Nuclear Operating Company (SNC, the licensee) submitted a license amendment request and a relief request for Vogtle Electric Generating Plant (Vogtle), Units 1 and 2.

The proposed change would revise Technical Specification (TS) 3.4.14, "RCS Pressure Isolation Valve (PIV) Leakage" and Surveillance Requirement (SR) 3.4.14.1 to only require testing at the frequencies specified in the Inservice Testing Program in accordance with the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance (OM) of Nuclear Power Plants. This would effectively remove PIV testing at 18-month, nine month, and event based frequencies to conform with the ASME OM 2-year testing on applicable Vogtle PIVs. Additionally, SNC proposed an alternative to the requirements of ASME OM Code Section ISTC-3522, "Category C Check Valves," and Subsection ISTC-3630(a) under Section ISTC-3630, "Leakage Rate for Other Than Containment Isolation Valves," for applicable Vogtle PIVs to allow testing to be conducted at a performance-based frequency, as specified in Nuclear Engineering Institute 94-01, Revision 3-A.

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 amendment and relief request. 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 technical specifications) 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.

Additionally, pursuant to Sections 50.55a(z)(1) and 50.55a(z)(2) of Title 10 of the *Code of Federal Regulations* (10 CFR), the applicant shall demonstrate that the proposed alternatives would provide an acceptable level of quality and safety, or that compliance with the specified requirements of Section 50.55a would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety.

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 amendment and relief requests 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, the NRC staff has estimated that this licensing request will take approximately 220 hours to complete the license amendment request, and an additional 230 hours to complete the relief request. The NRC staff expects to complete this review by April 30, 2024. 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, 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 at (301) 415-2258, or via email at [zachary.turner@nrc.gov](mailto:zachary.turner@nrc.gov).

Zach M. Turner, Project Manager  
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