

February 27, 2025

Docket Nos.: 52-025  
52-026

NL-24-0306  
10 CFR 50.90

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

**Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Units 3 and 4  
License Amendment Request: Remove Technical Specifications Table of Contents**

Ladies and Gentlemen:

In accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC) requests an amendment to the combined licenses (COLs) for Vogtle Electric Generating Plant (VEGP) Unit 3 (License No. NPF-91) and 4 (License No. NPF-92). The license amendment request (LAR) proposes a change to the COLs Appendix A, Technical Specifications (TS) to remove the table of contents.

Enclosure provides the description, technical evaluation, regulatory evaluation (including the Significant Hazards Consideration Determination) and environmental considerations for the proposed change.

SNC requests approval of the proposed license amendment request no later than twelve months after acceptance. SNC expects to implement the proposed amendment within 30 days of issuance.

This letter contains no regulatory commitments. This letter has been reviewed and determined not to contain security-related information.

In accordance with 10 CFR 50.91, a copy of this application, with enclosures, is being provided to the designated State of Georgia official.

If you have any questions, please contact Mr. Ryan Joyce at (205) 992-6468.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on the 27<sup>th</sup> day of February 2025.

Respectfully submitted,

A handwritten signature in black ink that reads "Jamie Coleman". The signature is written in a cursive, flowing style.

Jamie M. Coleman  
Regulatory Affairs Director

Enclosure:            Evaluation of Proposed Change

cc:    NRC Regional Administrator, Region II  
      NRR Project Manager – Vogtle 3&4  
      Senior Resident Inspector – Vogtle 3&4  
      Director, Environmental Protection Division - State of Georgia  
      Document Services RTYPE: VND.LI.L00

**ENCLOSURE to NL-24-0306**  
**Evaluation of Proposed Change**

**License Amendment Request:**  
**Remove Technical Specifications Table of Contents**

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Attachment: Proposed Technical Specification Change (Mark-ups)

## **1.0 SUMMARY DESCRIPTION**

In accordance with 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Southern Nuclear Operating Company (SNC) is requesting an amendment to the Technical Specifications (TS) for the combined licenses (COLs) for Vogtle Electric Generating Plant (VEGP) Units 3 and 4. This request is to revise the COLs Appendix A TS to remove the table of contents (TOC).

## **2.0 DETAILED DESCRIPTION**

### **2.1 System Design and Operation**

Each unit's COL includes an Appendix A, which identify TS requirements applicable to the plant as required by 10 CFR 50.36. The VEGP TS are generally written following the guidance of TSTF-GG-05-01, "Writer's Guide for Plant-Specific Improved Technical Specifications" Revision 1, for format and content.

### **2.2 Current Requirements**

10 CFR 50.36 contains requirements for what is to be included in a licensee's TS. Section 1 of the approved TS provide accepted rules for use and application of those TS.

### **2.3 Description of, and Reason for, the Proposed Change**

The TOC for the TS continue to be maintained but following approval of this license amendment request, responsibility for maintenance and issuance of updates to the TS TOC transfers from the NRC to SNC. The TOC would longer be included in the NRC-issued TS and as such would longer be part of the TS (Appendix A to the COL). The TOC for the TS would continue to be maintained under SNC control and issued by SNC in conjunction with the implementation of future NRC-approved TS amendments.

Placing the TOC under licensee control eliminates the regulatory burden of submitting TOC pages for NRC review and allows timely administrative corrections and improvements to the TOC without NRC review and approval.

## **3.0 TECHNICAL EVALUATION**

The TOC and list of effective pages do not meet the criteria specified in 10 CFR 50.36 requiring its inclusion within a plant's TS. 10 CFR 50.36(b) states:

"Each license authorizing operation of a production or utilization facility of a type described in § 50.21 or § 50.22 will include technical specifications. The technical specifications will be derived from the analyses and evaluation included in the safety analysis report, and amendments thereto, submitted pursuant to § 50.34."

10 CFR 50.36(c) states the "Technical specifications will include items in the following categories: ..." Review of 10 CFR 50.36(c) indicates that neither a TOC nor a list of effective pages were listed in the regulation as a category of information to be included. The list of effective pages was not issued with the original Appendix A and is currently maintained by SNC.

The TOC references the page number of each specification in the TS and does not contain any technical information required by 10 CFR 50.36 but is simply a listing of the included specifications to facilitate their usage. Since the TOC does not include information required to be in the TS by 10 CFR 50.36, inclusion of a TOC within the TS is optional and removal of the TOC from the TS is an administrative change.

Additionally, the "Writer's Guide for Plant-Specific Improved Technical Specifications" (TSTF-GG-05-01, Revision 1 [ML060720511]) was reviewed for guidance. The writer's guide refers to the TOC as "Technical Specification Front Matter," which also includes the title page and list of effective pages. These portions of the TS related documentation are described as "not part of the Technical Specifications" and, therefore, can be placed under licensee control as proposed in this amendment request.

Placing the TS TOC maintenance under SNC control allows the TOC to be issued by SNC in conjunction with the implementation of NRC-approved TS amendments that alter the TOC, just as the title page and list of effective pages are currently maintained and issued by SNC.

This change is consistent with a previously approved amendment for other SNC plants, and for other industry plants, as identified in Section 4.2, Precedent.

## **4.0 REGULATORY EVALUATION**

### **4.1 Applicable Regulatory Requirements/Criteria**

10 CFR 50.36 contains requirements for what is to be included in a licensee's TS. The TOC, which contains only reference information, is not required to be in the TS per the requirements of 10 CFR 50.36.

### **4.2 Precedent**

Southern Nuclear Company license amendment was issued on September 29, 2021, "Issuance of Amendments Regarding Removal of Table of Contents from the Technical Specifications." [ML21232A149] This license amendment approved the removal of the TOC from the TS, for Joseph M. Farley Nuclear Plant, Units 1 and 2, VEGP, Units 1 and 2, and Edwin I. Hatch Nuclear Plant, Units 1 and 2, similar to this request.

Exelon Generating Company license amendment was issued on December 18, 2019, "Issuance of Amendments to Remove Table of Contents from Technical Specifications." [ML19302E700] This license amendment approved the removal of the TOC from the TS of several plants in the Exelon fleet, similar to this request.

Point Beach Nuclear Plant license amendment was issued on October 11, 2011, "Issuance of Amendment re: Request to Remove the Table of Contents from the Technical Specifications."

[ML112640016] This license amendment approved the removal of the TOC from the Point Beach TS, similar to this request.

#### 4.3 Significant Hazards Evaluation

Southern Nuclear Operating Company (SNC) is requesting an amendment to the Technical Specifications (TS) to remove the table of contents from the NRC issued document.

SNC has evaluated the proposed change to the TS using the criteria in 10 CFR 50.92 and has determined that the proposed change do not involve a significant hazards consideration, as discussed below.

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

**Response: No**

The proposed change is administrative and affects responsibility for the control of the TOC. Transferring control of TOC changes to the licensee does not affect the operation, physical configuration, or function of plant equipment or systems. It does not impact the initiators or assumptions of analyzed events; nor does it impact the mitigation of accidents or transient events. The change involves no increase in the probability or consequences of an accident.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

**Response: No**

The proposed change does not alter the plant configuration, require installation of new equipment, alter assumptions about previously analyzed accidents, or impact the operation or function of plant equipment or systems.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

**Response: No**

The proposed change does not impact any safety assumptions or have the potential to reduce a margin of safety as described in the TS Bases.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.



Based upon the reasoning presented above, SNC concludes that the requested change involves no significant hazards consideration, as set forth in 10 CFR 50.92(c), "Issuance of Amendment."

#### 4.4 Conclusions

In conclusion, based on considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or the health and safety of the public.

### **5.0 ENVIRONMENTAL CONSIDERATION**

The amendment changes requirements with respect to the format of the license or otherwise makes editorial, corrective, or other minor changes. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10)(v). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

**ATTACHMENT to NL-24-0306**  
**Proposed Technical Specification Change (Mark-ups)**

**License Amendment Request:**  
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