

June 27, 2025

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52-026

ND-25-0257
10 CFR 50.59
10 CFR 52 App. D

U.S. Nuclear Regulatory Commission
ATTN: 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.

The enclosure to this letter provides the report containing a brief description of any 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, 2023 through May 31, 2025.

For the period of May 12, 2023 through May 31, 2025, there were no changes, tests, or experiments requiring evaluation per 10 CFR 50.59(c)(2), no changes made to Tier 2* information pursuant to the exemption in License Condition 2.D.(13)(a), and no changes made to Regulatory Commitments.

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 Mr. Ryan Joyce at 205-992-6468.

Respectfully submitted,



Jamie M. Coleman
Director, Fleet Regulatory Affairs
Southern Nuclear Operating Company

Enclosure: VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of
May 12, 2023 through May 31, 2025

cc: Regional Administrator, Region II
NRR Project Manager – VEGP 3&4
Senior Resident Inspector - VEGP 3&4
Document Services RTYPE: AR.01.02.06

Southern Nuclear Operating Company

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Enclosure

VEGP Units 3 and 4

**10 CFR 52, Appendix D Departure Report
for the Period of May 12, 2023 through May 31, 2025**

(This Enclosure consists of 23 pages, including this cover page)

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Enclosure

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of May 12, 2023 through May 31, 2025

Departure Number: LDCR-2022-040 **License Amendment:** Yes ☐ No ☒

Exemption: Yes ☐ No ☒

Unit 3 Amendment No.: N/A

Unit 4 Amendment No.: N/A

Departure Title: Clarify Depiction of Fire Barriers in UFSAR Appendix 9A Figures

Brief Description of the Plant-Specific Departure:

This departure updates UFSAR fire area Figures to enhance clarity and accurately reflect as-built configurations and previously approved 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.

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.

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Enclosure

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of May 12, 2023 through May 31, 2025

Departure Number:	LDCR-2022-049	License Amendment:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
		Exemption:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
		Unit 3 Amendment No.:	N/A
		Unit 4 Amendment No.:	N/A

Departure Title: Use of Installed Plant Equipment for Processing Contaminated Waste Streams

Brief Description of the Plant-Specific Departure:

This departure revised UFSAR Chapter 11, Radioactive Waste Management, to allow the use of installed equipment as an alternative to the currently discussed mobile equipment for processing chemical waste prior to discharge.

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

Summary of the Evaluation:

This plant-specific departure and the Technical Specification 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.

This departure and activity do 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 these changes.

ND-25-0257

Enclosure

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of May 12, 2023 through May 31, 2025

Departure Number: LDCR-2023-010 **License Amendment:** Yes ☒ No ☐

Exemption: Yes ☐ No ☒

Unit 3 Amendment No.: 194

Unit 4 Amendment No.: 191

Departure Title: Relocation of Technical Specification 3.7.9, Spent Fuel Pool Makeup Water Sources

Brief Description of the Plant-Specific Departure:

This departure relocates the requirements of VEGP Units 3 and 4 COL Appendix A Technical Specifications (TS) 3.7.9, "Spent Fuel Pool Makeup Water Sources," to the VEGP Technical Requirements Manual (TRM) as "UFSAR Standard Content," which is controlled in accordance with 10 CFR 50.59.

This departure resulted in changes to the TS, the TRM, the UFSAR (plant-specific DCD), and the TS Bases.

Summary of the Evaluation:

This departure made changes to COL Appendix A Technical Specifications; therefore, a License Amendment Request (LAR-23-003) was submitted to the NRC.

The NRC approved this License Amendment Request and issued License Amendments 194 and 191 to COL NPF-91 for VEGP Unit 3 and COL NPF-92 for VEGP Unit 4, respectively.

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Enclosure

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of May 12, 2023 through May 31, 2025

Departure Number:	LDCR-2023-018	License Amendment:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
		Exemption:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
		Unit 3 Amendment No.:	196
		Unit 4 Amendment No.:	N/A

Departure Title: License Amendment Request for Exception to Regulatory Guide 1.163

Brief Description of the Plant-Specific Departure:

This departure revised VEGP Unit 3 COL Appendix A Technical Specification (TS) 5.5.8, Containment Leak Rate Testing Program to include an exception to Regulatory Guide 1.163, Performance-Based Containment Leak-Test Program. This exception allows, for Unit 3, the specified frequency for the first periodic Type A integrated leak rate test (ILRT) to be performed prior to the earlier of initial Mode 4 entry for Unit 3 Cycle 2 and midnight on May 31, 2025.

This departure resulted in changes to the Unit 3 Technical Specifications and the UFSAR (plant-specific DCD).

Summary of the Evaluation:

This departure made a change to the VEGP Unit 3 COL Appendix A Technical Specifications; therefore, a License Amendment Request (LAR-23-007) was submitted to the NRC.

The NRC approved this License Amendment Request and issued License Amendment 196 to COL NPF-91 for VEGP Unit 3.

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Enclosure

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of May 12, 2023 through May 31, 2025

Departure Number: LDCR-2023-026

License Amendment: Yes ☐ No ☒

Exemption: Yes ☐ No ☒

Unit 3 Amendment No.: N/A

Unit 4 Amendment No.: N/A

Departure Title: Revise Initial Testing Requirements for Cooling Tower Power Ascension Testing

Brief Description of the Plant-Specific Departure:

This departure relocated and revised portions of the cooling tower power ascension testing requirement for testing and verification of thermal performance of the cooling towers using established industry test standards to allow the testing to be performed during the summer months, when weather conditions are optimal.

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

Summary of the Evaluation:

This plant-specific departure and the Technical Specification 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.

This departure and activity do 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 these changes.

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Enclosure

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of May 12, 2023 through May 31, 2025

Departure Number: LDCR-2023-027

License Amendment: Yes ☐ No ☒

Exemption: Yes ☐ No ☒

Unit 3 Amendment No.: N/A

Unit 4 Amendment No.: N/A

Departure Title: Incorporation by Reference Documents UFSAR Sections 5.2, 5.4, 6.2, 6.3 & 7.1

Brief Description of the Plant-Specific Departure:

This departure removed from UFSAR Table 1.6-1 the UFSAR Sections 5.2, 5.4, 6.2, 6.3 and 7.1 referenced documents that are not "incorporated by reference."

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.

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.

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Enclosure

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of May 12, 2023 through May 31, 2025

Departure Number: LDCR-2023-029

License Amendment: Yes ☐ No ☒

Exemption: Yes ☐ No ☒

Unit 3 Amendment No.: N/A

Unit 4 Amendment No.: N/A

Departure Title: Incorporation by Reference Documents UFSAR Sections 15.2, 15.4, & 15.6

Brief Description of the Plant-Specific Departure:

This departure removed from UFSAR Table 1.6-1 the UFSAR Sections 15.2, 15.4, and 15.6 referenced documents that are not “incorporated by reference.”

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.

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.

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Enclosure

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of May 12, 2023 through May 31, 2025

Departure Number: LDCR-2023-032

License Amendment: Yes ☐ No ☒

Exemption: Yes ☐ No ☒

Unit 3 Amendment No.: N/A

Unit 4 Amendment No.: N/A

Departure Title: Incorporation by Reference Documents UFSAR Section 16.1

Brief Description of the Plant-Specific Departure:

This departure removed from UFSAR Table 1.6-1 the UFSAR Section 16.1 referenced documents that are not "incorporated by reference." A new table was added to the UFSAR to identify methodology documents that are required by Technical Specifications. Text is added to the UFSAR description of the Diverse Actuation System (DAS) to refer to the document that identify the specific DAS controls that were selected based on Probabilistic Risk Assessment (PRA) risk importance.

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.

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.

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Enclosure

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of May 12, 2023 through May 31, 2025

Departure Number: LDCR-2023-035 **License Amendment:** Yes ☐ No ☒

Exemption: Yes ☐ No ☒

Unit 3 Amendment No.: N/A

Unit 4 Amendment No.: N/A

Departure Title: Revise the UFSAR to More Accurately Identify the Combustibles Materials and Fire Severity Categories for Each Fire Area / Fire Zone

Brief Description of the Plant-Specific Departure:

This departure revised UFSAR Table 9A-3 to more accurately identify the combustibles materials (and fire severity categories) for each Fire Area/Fire Zone and to more accurately quantify the fire severity category and equivalent duration for each Fire Area/Fire Zone. Revise associated sections, as needed, in the UFSAR to reflect the primary combustible within the safe shutdown evaluation section along with the category of the combustible materials.

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.

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.

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Enclosure

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of May 12, 2023 through May 31, 2025

Departure Number:	LDCR-2023-037	License Amendment:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
		Exemption:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
		Unit 3 Amendment No.:	N/A
		Unit 4 Amendment No.:	N/A

Departure Title: Revise UFSAR Fire Area Figures for Clarity and to Reflect As-built Configurations and Previously Approved Changes

Brief Description of the Plant-Specific Departure:

This departure revised UFSAR fire area figures to enhance clarity and accurately reflect as-built configurations and previously approved changes. UFSAR Figure 12.3-1 (Sheet 8 of 16) was revised to depict the outer periphery of the in-containment refueling water storage tank and to add notes indicating that the area around this outer periphery may reach elevated radiation levels during shutdown and operation for design basis conditions.

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.

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.

ND-25-0257

Enclosure

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of May 12, 2023 through May 31, 2025

Departure Number: LDCR-2023-039

License Amendment: Yes ☐ No ☒

Exemption: Yes ☐ No ☒

Unit 3 Amendment No.: N/A

Unit 4 Amendment No.: N/A

Departure Title: Unit 4 Reactor Coolant Drain Tank (RCDT) Nitrogen Purge Modification

Brief Description of the Plant-Specific Departure:

This Unit 4 only departure installed a permanent 1/2" field-routed tubing purge line, with two manual valves and a regulator valve, to enable manual purging of the RCDT when desired.

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

Summary of the Evaluation:

This plant-specific departure and the Technical Specification 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.

This departure and activity do 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 these changes.

ND-25-0257

Enclosure

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of May 12, 2023 through May 31, 2025

Departure Number:	LDCR-2023-047	License Amendment:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
		Exemption:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
		Unit 3 Amendment No.:	200
		Unit 4 Amendment No.:	196

Departure Title: Changes to Technical Specification 3.7.6, Main Control Room
Emergency Habitability System (VES) Action A and SR 3.7.6.6

Brief Description of the Plant-Specific Departure:

This departure revised UFSAR descriptions of breathing air quality provided by subsystems of the Compressed and Instrument Air System (CAS) to change the compressed air quality requirement specification from "ASHRAE Standard 62," to Compressed Gas Association (CGA) CGA G-7.1-1997, "Commodity Specification for Air, Grade E." These UFSAR changes conform with Technical Specification changes approved by VEGP Units 3 and 4 License Amendments 200 and 196.

This departure resulted in changes to the Unit 3&4 Technical Specifications and the UFSAR (plant-specific DCD).

Summary of the Evaluation:

This departure made a change to the VEGP Units 3 and 4 COLs; therefore, a License Amendment Request (LAR) (NL-24-0126) was submitted to the NRC.

The NRC approved this License Amendment Request and issued License Amendments 200 and 196 to COL NPF-91 for VEGP Unit 3 and COL NPF-92 for VEGP Unit 4, respectively.

ND-25-0257

Enclosure

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of May 12, 2023 through May 31, 2025

Departure Number: LDCR-2024-001

License Amendment: Yes ☐ No ☒

Exemption: Yes ☐ No ☒

Unit 3 Amendment No.: N/A

Unit 4 Amendment No.: N/A

Departure Title: Unit 3 Reactor Coolant Drain Tank (RCDT) Nitrogen Purge Modification

Brief Description of the Plant-Specific Departure:

This Unit 3 only departure installed a permanent 1/2" field-routed tubing purge line, with two manual valves and a regulator valve, to enable manual purging of the RCDT when desired.

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.

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.

ND-25-0257

Enclosure

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of May 12, 2023 through May 31, 2025

Departure Number:	LDCR-2024-095	License Amendment:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
		Exemption:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
		Unit 3 Amendment No.:	N/A
		Unit 4 Amendment No.:	N/A

Departure Title: Modification of Core Makeup Tank (CMT) Sampling Line for Additional Boron Sampling Point

Brief Description of the Plant-Specific Departure:

This departure modifies the Primary Sampling System (PSS) by adding new 0.25" AP1000 Equipment Class B tubing and manually operated sample isolation valves to allow boron concentration samples to be taken from the two CMTs at a third elevation between the current two grab locations. The new sample location will operators to more accurately determine a single bulk boron concentration as required by Technical Specifications (TS) Surveillance Requirement (SR) 3.5.2.4.

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.

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.

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Enclosure

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of May 12, 2023 through May 31, 2025

Departure Number: LDCR-2024-105

License Amendment: Yes ☐ No ☒

Exemption: Yes ☐ No ☒

Unit 3 Amendment No.: N/A

Unit 4 Amendment No.: N/A

Departure Title: Permanent Removal of Internals of Two Unit 3 Service Water System (SWS) Strainers

Brief Description of the Plant-Specific Departure:

This departure makes permanent the removal of two VEGP Unit 3 SWS strainers (3-SWS-S06A and 3-SWS-S06B), which have been operating with internals removed since November 2022. UFSAR documentation was revised to identify that SRW strainer internals are not installed on Unit 3 rendering the strainers incapable of performing straining functions.

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.

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.

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Enclosure

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of May 12, 2023 through May 31, 2025

Departure Number: LDCR-2024-133

License Amendment: Yes ☐ No ☒

Exemption: Yes ☐ No ☒

Unit 3 Amendment No.: N/A

Unit 4 Amendment No.: N/A

Departure Title: Technical Requirements Manual (TRM) Diverse Actuation System (DAS) Automatic Actuation Channel Operational Test (COT) Frequency Extension

Brief Description of the Plant-Specific Departure:

This departure revised VEGP Units 3&4 TRM 3.3.1, DAS Automatic Actuation, Technical Requirement Surveillance (TRS) 3.3.1.2 by extending the COT Frequency from 92 days to 24 months. A conforming change was made to UFSAR description of the DAS to identify that the plant-specific PRA model reflects DAS functionality testing at the frequency specified in the TRM.

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

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.

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Enclosure

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of May 12, 2023 through May 31, 2025

Departure Number:	LDCR-2024-155	License Amendment:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
		Exemption:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
		Unit 3 Amendment No.:	N/A
		Unit 4 Amendment No.:	N/A

Departure Title: Solid Waste Management System (WSS) Resin Fines Filter Filtration Rating Change (Unit 3 Only)

Brief Description of the Plant-Specific Departure:

This departure revised UFSAR Table 11.4-10 (for Unit 3 only) by changing the resin fines filter filtration rating from 10 microns to "up to 20 microns".

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.

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.

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Enclosure

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of May 12, 2023 through May 31, 2025

Departure Number: LDCR-2024-158 **License Amendment:** Yes ☐ No ☒

Exemption: Yes ☐ No ☒

Unit 3 Amendment No.: N/A

Unit 4 Amendment No.: N/A

Departure Title: Liquid Radwaste System (WLS) Resin Filter Size Change (Unit 3 Only)

Brief Description of the Plant-Specific Departure:

This departure changed the Unit 3 WLS waste pre-filter rating in Table 11.2-2 from 25 microns to "up to 40 microns" and the Unit 3 WLS waste after-filter rating in Table 11.2-2 from 0.5 microns to "up to 20 microns".

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.

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.

Departure Number: LDCR-2024-174 **License Amendment:** Yes ☐ No ☒
Exemption: Yes ☐ No ☒
Unit 3 Amendment No.: N/A
Unit 4 Amendment No.: N/A

Departure Title: Isolating Demineralized Water Transfer and Storage System (DWS) to Chemical and Volume Control System (CVS) Demineralizer Drain Line (Unit 4 Only)

Brief Description of the Plant-Specific Departure:

This departure changed the design of the DWS by providing a manual isolation valve for the connection to the CVS demineralizer drain line. This change established the capability to isolate the DWS as an un-borated water source to prevent inadvertent dilution of the Reactor Coolant System (RCS) via the flow path through CVS, while maintaining DWS supply inside containment to support other activities (e.g. resin transfer, decontamination activities, etc.). This departure is for Unit 4 only.

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.

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.

ND-25-0257

Enclosure

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of May 12, 2023 through May 31, 2025

Departure Number:	LDCR-2025-022	License Amendment:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
		Exemption:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
		Unit 3 Amendment No.:	N/A
		Unit 4 Amendment No.:	N/A

Departure Title: Solid Waste Management System (WSS) Resin Fines Filter Filtration Rating Change (Unit 4 Only)

Brief Description of the Plant-Specific Departure:

This departure revised UFSAR Table 11.4-10 (for Unit 4 only) by changing the resin fines filter filtration rating from 10 microns to "up to 20 microns".

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.

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.

Departure Number: LDCR-2025-036 **License Amendment:** Yes ☐ No ☒

Exemption: Yes ☐ No ☒

Unit 3 Amendment No.: N/A

Unit 4 Amendment No.: N/A

Departure Title: Reactor Loop Average Temperature (T_{avg}) Redundant Signal Selection Change (Unit 4 Only)

Brief Description of the Plant-Specific Departure:

This departure revised the signal selector algorithm for the reactor control system (T_{avg} /power control) from one which selects the T_{avg} control signal via a high-auctioneered signal selector algorithm from the four available Protection and Safety Monitoring System (PMS) divisions to a design that selects a median T_{avg} of Divisions A, B, and D with Division C configured as a spare. With this new change in place, only the three more stable T_{avg} signals (A, B, and D) will be used in the median select logic, with Division C configured as a spare, only to be used if one of the other three signals becomes unusable (e.g., bad quality); thereby configuring Division C as a spare maintains redundancy for Division A. This unit-specific change to the UFSAR description of the Reactor Power Control System applies to Unit 4 only.

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.

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.

ND-25-0257

Enclosure

VEGP Units 3 and 4, 10 CFR 52, Appendix D Departure Report for the Period of May 12, 2023 through May 31, 2025

Departure Number: LDCR-2025-040

License Amendment: Yes ☐ No ☒

Exemption: Yes ☐ No ☒

Unit 3 Amendment No.: N/A

Unit 4 Amendment No.: N/A

Departure Title: Chemical and Volume Control System (CVS) Mixed Bed Demineralizer Resin

Brief Description of the Plant-Specific Departure:

This departure revised the requirements for resins to be used in the CVS mixed bed demineralizers to allow the use of cation or anion resin, or a mixture of these resins.

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.

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.