

**From:** [John Lamb](#)  
**To:** [Lowery, Ken G.](#)  
**Cc:** [Joyce, Ryan M.](#)  
**Subject:** For Your Action - RCI - Vogtle Units 3 and 4 Alternative Request V34-IST-ALT-04 (L-2026-LLR-0009)  
**Date:** Thursday, March 5, 2026 10:58:00 AM

---

Ken,

By letter dated February 13, 2026, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML26044A119), Southern Nuclear Operating Company (SNC, the licensee) submitted request for revision to approved relief and alternative requirements for squib (explosively actuated) valves first test interval (V34-IST-ALT-04) to the U.S. Nuclear Regulatory Commission (NRC). SNC submitted V34-IST-ALT-04 to authorize for relief from specified requirements of Title 10, *Code of Federal Regulations* (10 CFR), Section 50.55a and to authorize an alternative to the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) testing and replacement interval requirements for the squib (explosively actuated) valves in OM Code Sections ISTC-5260(c), ISTC-5260(e)(2), ISTC-5260(e)(3), and ISTC-5260(e)(4) on the basis that the alternative provides an acceptable level of quality and safety.

Specifically, pursuant to 10 CFR 50.55a(z)(1), the licensee requested that the NRC authorize alternative request V34-IST-04 for testing certain squib valves at Vogtle, Units 3 and 4, on the basis that compliance with the ASME OM Code requirements would result in acceptable level of quality and safety.

The NRC staff has determined that additional information is required for the staff to complete its review. The NRC staff sent a draft request for confirmatory information (RCI) via email on March 2, 2026. A clarification call was held on March 5, 2026, and SNC said it would respond to the RCI by March 12, 2026.

If you have any questions, please contact me.

John G. Lamb, Senior Project Manager  
Plant Licensing Branch II-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

---

### **REQUEST FOR CONFIRMATORY INFORMATION (RCI)**

By letter dated February 13, 2026, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML26044A119), Southern Nuclear Operating Company (SNC, the licensee) submitted request for revision to approved relief and alternative requirements for squib (explosively actuated) valves first test interval (V34-IST-ALT-04) to the U.S. Nuclear Regulatory Commission (NRC). SNC submitted V34-IST-ALT-04 to authorize for relief from specified requirements of Title 10, *Code of Federal Regulations* (10 CFR), Section 50.55a and to authorize an alternative to the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) testing and replacement interval requirements for the squib (explosively

actuated) valves in OM Code Sections ISTC-5260(c), ISTC-5260(e)(2), ISTC-5260(e)(3), and ISTC-5260(e)(4) on the basis that the alternative provides an acceptable level of quality and safety.

Specifically, pursuant to 10 CFR 55.55a(z)(1), the licensee requested that the NRC authorize alternative request V34-IST-04 for testing certain squib valves at Vogtle, Units 3 and 4, on the basis that compliance with the ASME OM Code requirements would result in acceptable level of quality and safety.

The NRC staff has determined that additional information is required for the staff to complete its review.

### Regulatory Evaluation

The NRC regulations in 10 CFR 55.55a(z), "Alternatives to codes and standards requirements," state, in part, that alternatives to the requirements of paragraphs (b) through (h) of this section or portions thereof may be used when authorized by the Director, Office of Nuclear Reactor Regulation. A proposed alternative must be submitted and authorized prior to implementation. The applicant or licensee must demonstrate that:

(1) *Acceptable level of quality and safety.* The proposed alternative would provide an acceptable level of quality and safety; or

(2) *Hardship without a compensating increase in quality and safety.* Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

### RCI

Section 6.3, "Passive Core Cooling System," in the AP1000 design control document (DCD), Revision 19, referenced by the Vogtle, Units 3 and 4, updated final safety analysis report (UFSAR) discusses redundant flow paths that include squib valves for the performance of the passive core cooling system. For example, Section 6.3.2.5.2, "Response to Passive Failure," states that the passive core cooling system flow paths are separated into redundant lines, either of which can provide minimum core cooling functions and return spilled water from the floor of the containment back to the reactor coolant system." Further, Figure 6.3-3, "Passive Safety Injection," shows one of two sets of flow paths with the other set indicated to be identical. The ASME OM Code refers to redundant trains that is consistent with the redundant flow path discussion in Section 6.3 of the AP1000 DCD. In Alternative Request V34-IST-ALT-04, SNC states that it now considers that "redundant safety trains" should be based on the totality of valves in separate flow paths, such that testing one of the four redundant valves for each system satisfies the intent of the Code. Is SNC planning to update the discussion of the passive core cooling system in the Vogtle, Units 3 and 4, UFSAR to be consistent with the new description in the alternative request?