



Proposed Vogtle Electric Generating Plant Units 3 & 4 License Amendment Request

**Revise Combined License
to Increase Flexibility in Fire Protection Changes**

Pre-submittal Meeting: June 10, 2026

Agenda

- Background Information
- Current Requirements
- Proposed Changes
- Technical Evaluation
- Regulatory Evaluation
- Requested Schedule
- Discussion / Feedback

Revise Combined License to Increase Flexibility in Fire Protection Changes

BACKGROUND INFORMATION

NRC proposed License Condition for changes to the Fire Protection Program

- GL 86-10 provided generic License Condition wording

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

The licensee may alter specific features of the approved program provided (a) such changes do not otherwise involve a change in a license condition or technical specification or result in an unreviewed safety question (see 10 CFR 50.59), and (b) such changes do not result in failure to complete the fire protection program as approved by the Commission. As with other changes implemented under 10 CFR 50.59, the licensee shall maintain, in auditable form, a current record of all such changes, including an analysis of the effects of the change on the fire protection program, and shall make such records available to NRC Inspectors upon request. All changes to the approved program shall be reported annually to the Director of the Office of Nuclear Reactor Regulation, along with the FSAR revisions required by 10 CFR 50.71(e).

Temporary changes to specific fire protection features which may be necessary to accomplish maintenance or modifications are acceptable provided interim compensatory measures are implemented.

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BACKGROUND INFORMATION

- Vogtle 1&2 License Condition (Same Site)
Southern Nuclear may make changes to the approved fire protection program without prior approval of the Commission, only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

CURRENT REQUIREMENTS

- Vogtle 3&4
No license condition.
50.59 change criteria applied.

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PROPOSED CHANGES

- **Add Combined License Condition (to match Vogtle 1&2)**

Southern Nuclear may make changes to the approved fire protection program without prior approval of the Commission, only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

- **Need and Benefits**

- Current different requirements lead to separate and significantly different evaluations for a change to Vogtle 3&4 than are necessary for the same change being made to Vogtle 1&2.
 - Consistent License Conditions provide for consistent evaluations.
 - SNC has a detailed Fire Protection change evaluation process used at Vogtle 1&2 and at other SNC sites but not at Vogtle 3&4. A Vogtle 3&4 license condition would make the detailed Fire Protection reviews a consistent review of the safe shutdown capability and fire PRA.
- Vogtle 1&2 evaluations are satisfactory to maintain safe shutdown capability with regard to fire protection.
 - Consistent License Conditions maintain safety.
- License condition may result in fewer full evaluations (one known case).

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TECHNICAL EVALUATION

- License Condition is allowed
- Per NEI 02-03, Section 2.1

“10 CFR 50.59(c)(4) provides that when applicable regulations establish more specific criteria for controlling certain changes, 10 CFR 50.59 does not also apply. Consistent with this intent, the standard fire protection license condition establishes specific criteria for control of fire protection changes and falls within the scope of 10 CFR 50.59(c)(4). Thus, applying 10 CFR 50.59 to fire protection program changes is not required.”

“Where a licensee possesses a license condition that specifically permits changes to the NRC-approved fire protection program (i.e., has received the standard fire protection license condition contained in Generic Letter 86-10), subsequent changes to the fire protection program would be controlled under the license condition and not 10 CFR 50.59.”

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TECHNICAL EVALUATION

- 50.59 criteria not readily applicable to fire protection.
 - Process focuses on accidents and consequences; fires are an operational event.
- License condition criteria more applicable.
 - Fire protection screen focuses on topics specific to fire:
 - Ability to achieve and maintain safe shutdown
 - Radioactive release limits under 10 CFR Part 20
 - Special fire protection administrative processes
 - Special fire protection equipment, e.g., suppression, detection, barriers
 - Fire risk impacts and Fire PRA impacts.

REGULATORY EVALUATION

The proposed License Condition is consistent with regulations.

10 CFR 50.59 or License Condition?

- Part 50 fleet uses License Condition;
- Only VEGP Units 3 & 4 using 50.59.

Either provides adequate safety.

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Requested Schedule

- Submit LAR to NRC 3Q2026
- Outage Related No
- Requested Approval by NRC 1Q2027

**DISCUSSION
and
FEEDBACK**