

December 19, 2022

ND-22-0930  
10 CFR 50.73(a)(2)(i)(B)

Docket No.: 52-025

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

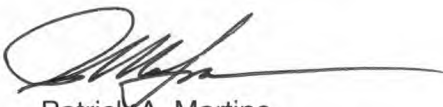
Southern Nuclear Operating Company  
Vogtle Electric Generating Plant (VEGP) – Unit 3  
Licensee Event Report 2022-003-00  
Unborated Water Flowpath not Secured per Technical Specification 3.9.2 Due to Inadequate  
Procedure Change

Ladies and Gentlemen:

In accordance with the requirements of 10 CFR 50.73(a)(2)(i)(B), Southern Nuclear Operating Company is submitting the enclosed Licensee Event Report for VEGP Unit 3.

This letter contains no regulatory commitments. If you have questions regarding the enclosed information, please contact Will Garrett at (706) 848-7154.

Respectfully submitted,



Patrick A. Martino  
Site Vice President, Unit 3

PAM/KMS/sfr

Enclosure: Unit 3 Licensee Event Report 2022-003-00

CC:  
Regional Administrator, Region II  
VPO Project Manager  
Senior Resident Inspector – Vogtle 3 & 4  
Director, Environmental Protection Division - State of Georgia

**Vogtle Electric Generating Plant - Unit 3**

**Licensee Event Report 2022-003-00**

**Unborated Water Flowpath not Secured per Technical Specification 3.9.2 Due to  
Inadequate Procedure Change**

**Enclosure**

**Unit 3 Licensee Event Report 2022-003-00**

<b>NRC FORM 366</b> (08-2020)		<b>U.S. NUCLEAR REGULATORY COMMISSION</b>		<b>APPROVED BY OMB: NO. 3150-0104</b>		<b>EXPIRES: 08/31/2023</b>					
<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;"> </div> <div> <b>LICENSEE EVENT REPORT (LER)</b>            (See Page 3 for required number of digits/characters for each block)            (See NUREG-1022, R.3 for instruction and guidance for completing this form  <a href="http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/">http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/</a>)         </div> <div style="font-size: 0.8em;">           Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to <a href="mailto:Infocollections.Resource@nrc.gov">Infocollections.Resource@nrc.gov</a>, and the OMB reviewer at: OMB Office of Information and Regulatory Affairs, (3150-0104), Attn: Desk alt: <a href="mailto:oir_submission@omb.eop.gov">oir_submission@omb.eop.gov</a>. The NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the document requesting or requiring the collection displays a currently valid OMB control number.         </div> </div>											
<b>1. Facility Name</b> Vogtle Electric Generating Plant Unit 3				<b>2. Docket Number</b> <b>05000</b> "05200025"		<b>3. Page</b> <b>1 OF 2</b>					
<b>4. Title</b> Unborated Water Flowpath not Secured per Technical Specification 3.9.2 Due to Inadequate Procedure Revision											
<b>5. Event Date</b>			<b>6. LER Number</b>			<b>7. Report Date</b>			<b>8. Other Facilities Involved</b>		
Month	Day	Year	Year	Sequential Number	Revision No.	Month	Day	Year	Facility Name	Docket Number	
10	24	2022	2022	- 003 -	00	12	19	2022		<b>05000</b>	
									Facility Name	Docket Number	
										<b>05000</b>	
<b>9. Operating Mode</b> <div style="text-align: center; font-size: 1.2em;">6</div>						<b>10. Power Level</b> <div style="text-align: center; font-size: 1.2em;">000</div>					
<b>11. This Report is Submitted Pursuant to the Requirements of 10 CFR §: (Check all that apply)</b>											
<b>10 CFR Part 20</b>		<input type="checkbox"/> 20.2203(a)(2)(vi)		<input type="checkbox"/> 50.36(c)(2)		<input type="checkbox"/> 50.73(a)(2)(iv)(A)		<input type="checkbox"/> 50.73(a)(2)(x)			
<input type="checkbox"/> 20.2201(b)		<input type="checkbox"/> 20.2203(a)(3)(i)		<input type="checkbox"/> 50.46(a)(3)(ii)		<input type="checkbox"/> 50.73(a)(2)(v)(A)		<b>10 CFR Part 73</b>			
<input type="checkbox"/> 20.2201(d)		<input type="checkbox"/> 20.2203(a)(3)(ii)		<input type="checkbox"/> 50.69(g)		<input type="checkbox"/> 50.73(a)(2)(v)(B)		<input type="checkbox"/> 73.71(a)(4)			
<input type="checkbox"/> 20.2203(a)(1)		<input type="checkbox"/> 20.2203(a)(4)		<input type="checkbox"/> 50.73(a)(2)(i)(A)		<input type="checkbox"/> 50.73(a)(2)(v)(C)		<input type="checkbox"/> 73.71(a)(5)			
<input type="checkbox"/> 20.2203(a)(2)(i)		<b>10 CFR Part 21</b>		<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)		<input type="checkbox"/> 50.73(a)(2)(v)(D)		<input type="checkbox"/> 73.77(a)(1)(i)			
<input type="checkbox"/> 20.2203(a)(2)(ii)		<input type="checkbox"/> 21.2(c)		<input type="checkbox"/> 50.73(a)(2)(i)(C)		<input type="checkbox"/> 50.73(a)(2)(vii)		<input type="checkbox"/> 73.77(a)(2)(i)			
<input type="checkbox"/> 20.2203(a)(2)(iii)		<b>10 CFR Part 50</b>		<input type="checkbox"/> 50.73(a)(2)(ii)(A)		<input type="checkbox"/> 50.73(a)(2)(viii)(A)		<input type="checkbox"/> 73.77(a)(2)(ii)			
<input type="checkbox"/> 20.2203(a)(2)(iv)		<input type="checkbox"/> 50.36(c)(1)(i)(A)		<input type="checkbox"/> 50.73(a)(2)(ii)(B)		<input type="checkbox"/> 50.73(a)(2)(viii)(B)					
<input type="checkbox"/> 20.2203(a)(2)(v)		<input type="checkbox"/> 50.36(c)(1)(ii)(A)		<input type="checkbox"/> 50.73(a)(2)(iii)		<input type="checkbox"/> 50.73(a)(2)(ix)(A)					
<input type="checkbox"/> <b>OTHER</b> (Specify here, in abstract, or NRC 366A).											
<b>12. Licensee Contact for this LER</b>											
<b>Licensee Contact</b> Will Garrett, VEGP 3&4 Site Licensing Manager									<b>Phone Number (Include area code)</b> 7068487154		
<b>13. Complete One Line for each Component Failure Described in this Report</b>											
Cause	System	Component	Manufacturer	Reportable to IRIS	Cause	System	Component	Manufacturer	Reportable to IRIS		
<b>14. Supplemental Report Expected</b>							<b>15. Expected Submission Date</b>				
<input checked="" type="checkbox"/> No		<input type="checkbox"/> Yes (If yes, complete 15. Expected Submission Date)					Month	Day	Year		
<b>16. Abstract</b> (Limit to 1560 spaces, i.e., approximately 15 single-spaced typewritten lines)											
<p>On October 24, 2022, Vogtle Unit 3 identified that Surveillance Requirement (SR) 3.9.2.1 to "Verify one valve in each unborated water source flow path is secured in the closed position," was not met, placing the unit in Technical Specification Limiting Condition for Operation (LCO) 3.9.2 Condition A. The Demineralized Water Supply Containment Isolation valve 3-DWS-V244 was open, having previously been removed from procedure 3-RCS-OTS-20-001, "Unborated Water Source Checklist," without adding adequate requirements for alternate isolation valves in the Chemical and Volume Control system. LCO Required Action A.1, to initiate actions to secure one valve in the flow path in the closed position, was performed immediately and Required Action A.2 was performed within 4 hours. The apparent cause of this event was that the procedure to perform SR 3.9.2.1 (3-RCS-OTS-20-001) was inadequate in ensuring unborated water sources were properly isolated. The immediate corrective action was to close and secure the valve in the flow path. Procedure 3-RCS-OTS-20-001 was revised to add the missing unborated water isolation valves. This event is reportable under 10 CFR 50.73(a)(2)(i)(B) as an operation or condition prohibited by the plant's Technical Specifications. VEGP Units 1, 2, and 4 were unaffected during this event.</p>											





## LICENSEE EVENT REPORT (LER) CONTINUATION SHEET

(See NUREG-1022, R.3 for instruction and guidance for completing this form  
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/>)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U. S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to [Infocollects.Resource@nrc.gov](mailto:Infocollects.Resource@nrc.gov), and the OMB reviewer at: OMB Office of Information and Regulatory Affairs, (3150-0104), Attn: Desk Officer for the Nuclear Regulatory Commission, 725 17th Street NW, Washington, DC 20503; e-mail: [oir\\_submission@omb.eop.gov](mailto:oir_submission@omb.eop.gov). The NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the document requesting or requiring the collection displays a currently valid OMB control number.

1. FACILITY NAME	2. DOCKET NUMBER	3. LER NUMBER		
Vogtle Electric Generating Plant, Unit 3	05000- "05200025"	YEAR 2022	SEQUENTIAL NUMBER 003	REV NO. 00

### NARRATIVE

#### EVENT DESCRIPTION

On October 24, 2022, at 0815 EDT with the Vogtle Electric Generating Plant (VEGP) Unit 3 at 0% power, in Mode 6 after completion of the initial fuel load, Surveillance Requirement (SR) 3.9.2.1 verifying that one valve in each unborated water source flow path is secured in the closed position was not met. Specifically, 3-DWS-V244 Demineralized Water Supply Containment Isolation valve [EIS: KJ / ISV] was in the open position, resulting in an unborated water source flow path without one valve verified secured in the closed position. LCO Required Action A.1, to initiate actions to secure one valve in the flow path in the closed position, was performed immediately, and Required Action A.2, verify boron concentration is within the limit specified in the COLR, was performed within 4 hours. This event is reportable under 10 CFR 50.73(a)(2)(i)(B) as operation or condition prohibited by the plant's Technical Specifications (TS). The condition prohibited by the TS began when the unit entered Mode 6 on October 13, 2022, at 2354 hours and exited on October 25, 2022, at 1411 hours.

#### EVENT ANALYSIS

The cause of this event is inadequate procedure 3-RCS-OTS-20-001, "Unborated Water Source Checklist," which is the unborated water sources surveillance procedure required to be performed in accordance with SR 3.9.2.1 to verify proper isolation of each unborated water source flow path. Specifically, the dilution flow path was no longer accounted for due to a previous change to procedure 3-RCS-OTS-20-001.

#### REPORTABILITY AND SAFETY ASSESSMENT

There were no safety consequences due to this event because the boron concentration requirements of TS 3.9.1, "Boron Concentration," were met. No radiological release occurred due to this event. This event is reportable under 10 CFR 50.73(a)(2)(i)(B) as an operation or condition prohibited by the plant's Technical Specifications.

#### CORRECTIVE ACTIONS COMPLETED

Procedure 3-RCS-OTS-20-001, "Unborated Water Source Checklist", was revised to add additional unborated water isolations.

#### PREVIOUS SIMILAR EVENTS

None