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ND-23-0140

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 2023-001-00
Manual Actuation of Reactor Protection System During Mode 3 Due to an Inadequate
Procedure Step

Ladies and Gentlemen:

In accordance with the requirements of 10 CFR 50.73(a)(2)(iv)(A), 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,

A handwritten signature in black ink, appearing to read "Pat Martino", written over a horizontal line.

Patrick A. Martino
Site Vice President, Unit 3

PAM/KMS/sfr

Enclosure: Unit 3 Licensee Event Report 2023-001-00

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 2023-001-00

Manual Actuation of Reactor Protection System During Mode 3
Due to an Inadequate Procedure Step

Enclosure

Unit 3 Licensee Event Report 2023-001-00



LICENSEE EVENT REPORT (LER)

(See Page 2 for required number of digits/characters for each block)

(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 email to Infocollections.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; email: oira_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

Vogtle Electric Generating Plant, Unit 3

☐ 050
☒ 052

2. Docket Number

00025

3. Page

1 OF 2

4. Title

Manual Actuation of Reactor Protection System During Mode 3 Due to an Inadequate Procedure Step

5. Event Date

Month	Day	Year
01	14	2023

6. LER Number

Year	Sequential Number	Revision No.
2023	001	00

7. Report Date

Month	Day	Year
03	14	2023

8. Other Facilities Involved

Facility Name	<input type="checkbox"/> 050	Docket Number
Facility Name	<input type="checkbox"/> 052	Docket Number

9. Operating Mode

3

10. Power Level

000

11. This Report is Submitted Pursuant to the Requirements of 10 CFR §: (Check all that apply)

10 CFR Part 20	<input type="checkbox"/> 20.2203(a)(2)(vi)	10 CFR Part 50	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	<input type="checkbox"/> 73.1200(a)
<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<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"/> 73.1200(b)
<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<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"/> 73.1200(c)
<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.36(c)(2)	<input checked="" type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)	<input type="checkbox"/> 73.1200(d)
<input type="checkbox"/> 20.2203(a)(2)(i)	10 CFR Part 21	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	10 CFR Part 73	<input type="checkbox"/> 73.1200(e)
<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 21.2(c)	<input type="checkbox"/> 50.69(g)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.77(a)(1)	<input type="checkbox"/> 73.1200(f)
<input type="checkbox"/> 20.2203(a)(2)(iii)		<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> 73.77(a)(2)(i)	<input type="checkbox"/> 73.1200(g)
<input type="checkbox"/> 20.2203(a)(2)(iv)		<input type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	<input type="checkbox"/> 73.77(a)(2)(ii)	<input type="checkbox"/> 73.1200(h)
<input type="checkbox"/> 20.2203(a)(2)(v)		<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)		

☐ OTHER (Specify here, in abstract, or NRC 366A).

12. Licensee Contact for this LER

Licensee Contact

Will Garrett, VEGP 3&4 Licensing Manager

Phone Number (Include area code)

7068487154

13. Complete One Line for each Component Failure Described in this Report

Cause	System	Component	Manufacturer	Reportable to IRIS	Cause	System	Component	Manufacturer	Reportable to IRIS

14. Supplemental Report Expected

☒ No ☐ Yes (If yes, complete 15. Expected Submission Date)

15. Expected Submission Date

Month	Day	Year

16. Abstract (Limit to 1326 spaces, i.e., approximately 13 single-spaced typewritten lines)

On January 14, 2023, at 0721 EST with Vogtle Electric Generating Plant (VEGP) Unit 3 in Mode 3 at 0 percent power, the Reactor Protection System (RPS) was manually actuated while conducting pre-criticality testing. The manual RPS actuation was in response to low gland steam pressure. The reactor trip breakers were in an open state prior to the RPS actuation. The cause of this event was an inadequate procedure step. This step was revised to require checking reactor trip breakers are not open prior to manually tripping the reactor in response to gland steam pressure below the procedural limit. This event is reportable under 10 CFR 50.73(a)(2)(iv)(A) as a condition that resulted in manual actuation of the RPS. VEGP Units 1, 2, and 4 were unaffected by this event.



LICENSEE EVENT REPORT (LER) CONTINUATION SHEET

(See NUREG-1022, R.3 for instruction and guidance for completing this form
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1. FACILITY NAME		<input type="checkbox"/> 050 <input checked="" type="checkbox"/> 052	2. DOCKET NUMBER	3. LER NUMBER		
Vogtle Electric Generating Plant, Unit 3			00025	YEAR	SEQUENTIAL NUMBER	REV NO.
				2023	001	00

NARRATIVE

EVENT DESCRIPTION

On January 14, 2023, at 0721 EST with Vogtle Electric Generating Plant (VEGP) Unit 3 in Mode 3 at 0 percent power, the Reactor Protection System (RPS) [EIS: JC] was manually actuated. A gland steam system [EIS: TC] pressure transient occurred during pre-criticality testing. Operators responded in accordance with the applicable Abnormal Operating Procedure (AOP) 3-AOP-202, "Condensate System Malfunctions," which required initiation of a manual reactor trip. There were no structures, systems or components that were out of service at the beginning of the event that contributed to the event. This event is reportable under 10 CFR 50.73(a)(2)(iv)(A) as a condition that resulted in manual actuation of the RPS.

EVENT CAUSE ANALYSIS

The cause of this event was determined to be an inadequate procedure step. The procedure 3-AOP-202 required a manual actuation of the RPS, when responding to low gland steam pressure, without first checking status of the reactor trip breakers. Since the reactor trip breakers were already open, the procedurally directed reactor trip was an unnecessary RPS actuation.

REPORTABILITY AND SAFETY ASSESSMENT

This event is reportable pursuant to 10 CFR 50.73(a)(2)(iv)(A) due to manual actuation of the RPS. There were no safety consequences due to this event. When the reactor was manually tripped, the reactor trip breakers were already in an open state, there was no irradiated fuel in the core, and there was no decay heat present. VEGP Units 1, 2, and 4 were unaffected by this event.

CORRECTIVE ACTIONS

Procedure 3-AOP-202, "Condensate System Malfunctions," was revised to require checking reactor trip breakers are not open prior to manually tripping the reactor when responding to gland steam pressure below the AOP's established limit.

PREVIOUS SIMILAR EVENTS

None