

March 1, 2023

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Vogtle Project Office
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comment on the January 13, 2023, license amendment for Plant Vogtle Unit 3.
[Document ID: NRC-2008-0252-0206].

The Breakthrough Institute (BTI) appreciates this opportunity to comment on the license amendment for Plant Vogtle Unit 3 that the Nuclear Regulatory Commission (NRC) issued on January 13, 2023. BTI is an independent 501(c)(3) global research center that advocates for appropriate regulation and oversight of nuclear reactors to enable the new and continued use of safe and clean nuclear energy. BTI acts in the public interest and does not receive funding from industry.

During a recent test of the reactor, elevated line vibration was detected. The cause of the vibration was later determined to be due to certain pipe support dynamic pipe clamps being incorrectly installed during construction. The work needed to correct this issue involves changes to the Combined License (COL) Appendix A Technical Specifications. Such a change requires a license amendment.

Southern Nuclear Operating Company (SNC) requested expedited approval of the license amendment, which is allowed in emergency situations if certain criteria¹ are met - one of which is a determination of no significant hazards. The proposed changes were found to

¹ 10 CFR 50.91(a)(5).

meet the standards for such a determination.² Based on the publicly available information, this finding is reasonable and appropriate. There is zero risk to the public involved with the operation of the reactor in Mode 4 without the Automatic Depressurization System (ADS) prior to initial criticality in the reactor.

The expedited amendment issuance was not only reasonable, but it was also necessary to avoid even further delay of the start-up of Vogtle Unit 3. Every day of unnecessary delay is a day where clean, reliable electricity is not being added to the grid and perpetuates public health and environmental impacts caused by fossil fuel use.

BTI commends the NRC staff's prompt response to SNC's license amendment request. The process was executed in a manner commensurate to the general welfare of the public. We strongly encourage the NRC staff to be this efficient³ and considerate of the general welfare of the public in all other aspects of their work.

BTI appreciates the opportunity to comment on the timely approval of SNC's amendment request.

Sincerely,

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² The NRC staff laid out the reasoning for the decision starting on p. 6 here:

<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML23013A220>.

³ Efficiency is a Principle of Good Regulation.