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Docket Nos.: 50-424  
50-425

NL-13-1764

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

Vogtle Electric Generating Plant – Units 1 and 2  
First Six-Month Status Report of the Implementation of the  
Requirements of the Commission Order with Regard to  
Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049)

References:

1. NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012
2. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012
3. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012
4. Vogtle Electric Generating Plant - Units 1 and 2 Initial Status Report in Response to Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049), dated October 23, 2012
5. Vogtle Electric Generating Plant - Units 1 and 2 Overall Integrated Plan in Response to Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049), dated February 27, 2013

Ladies and Gentlemen:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an order (Reference 1) to Southern Nuclear Operating Company. Reference 1 was immediately effective and directs the Vogtle Electric Generating Plant - Units 1 and 2 (VEGP) to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C.1.a of Reference 1. Reference 2 endorses industry guidance document NEI 12-06, Revision 0 (Reference 3) with clarifications and exceptions identified in Reference 2.

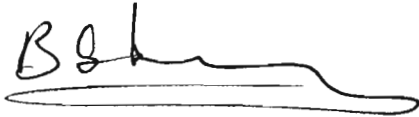
Reference 4 provided the VEGP initial status report regarding mitigation strategies. Reference 5 provided the VEGP overall integrated plan.

Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 3 provides direction regarding the content of the status reports. The purpose of this letter is to provide the first six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The enclosed report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no NRC commitments. If you have any questions, please contact John Giddens at 205.992.7924.

Mr. B. L. Ivey states he is a Vice President of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and, to the best of his knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,



Mr. B. L. Ivey  
Vice President - Regulatory Affairs

BLI/CLN/lac

Sworn to and subscribed before me this 27<sup>th</sup> day of August, 2013.

Nancy Louise Henderson  
Notary Public

My commission expires: March 23, 2014



Enclosure: Vogtle Electric Generating Plant - Units 1 and 2  
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cc: Southern Nuclear Operating Company  
Mr. S. E. Kuczynski, Chairman, President & CEO  
Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer  
Mr. T. E. Tynan, Vice President – Vogtle  
Mr. C. R. Pierce, Regulatory Affairs Director  
Mr. B. J. Adams, Vice President – Fleet Operations  
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Mr. E. Leeds, Director of the Office of Nuclear Reactor Regulations

Mr. V. M. McCree, Regional Administrator

Mr. R. E. Martin, NRR Senior Project Manager – Vogtle

Mr. L. M. Cain, Senior Resident Inspector – Vogtle

Ms. J. A. Kratchman, NRR/JLD/PMB

Mr. E. E. Bowman, NRR/DPR/PGCB

State of Georgia

Mr. J. H. Turner, Environmental Director Protection Division

**Vogtle Electric Generating Plant – Units 1 and 2  
First Six-Month Status Report of the Implementation of the  
Requirements of the Commission Order with Regard to  
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**Enclosure**

**Vogtle Electric Generating Plant – Units 1 and 2  
First Six-Month Status Report of the Implementation of the  
Requirements of the Commission Order with Regard to  
Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049)**

**Vogtle Electric Generating Plant – Units 1 and 2  
 First Six-Month Status Report of the Implementation of the  
 Requirements of the Commission Order with Regard to  
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**1 Introduction**

Vogtle Electric Generating Plant - Units 1 and 2 developed an Overall Integrated Plan (Reference 1 of this enclosure), documenting the diverse and flexible strategies (FLEX), in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the Overall Integrated Plan, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

**2 Milestone Accomplishments**

In addition to the submittal of status reports, the following milestone(s) directly related to FLEX implementation have been completed since the development of the Overall Integrated Plan (Reference 1), and are current as of June 30, 2013:

- None

**3 Milestone Schedule Status**

The following provides an update to Attachment 2 of the Overall Integrated Plan. It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed. The revised milestone target completion date does not impact the Order implementation date.

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Submit 60 Day Status Report	Oct 2012	Complete	N/A
Submit Overall Integrated Plan	Feb 2013	Complete	N/A
Submit 6 Month Status Report	Aug 2013	Complete (see Sec. 2)	N/A
Initiate Phase 2 Equipment Procurement	Sep 2013	Started	
Develop Strategies (Playbook) with RRC	Nov 2013	Started	Jun 2014
Develop Operational Procedure Changes	Dec 2013	Started	
Develop Modifications	Jan 2014	Started	
Submit 6 Month Status Report	Feb 2014	Not Started	
Develop Training Material	Mar 2014	Started	
Submit 6 Month Status Report	Aug 2014	Not Started	
Issue FSGs	Sep 2014	Not Started	
Implement Training	Oct 2014	Not Started	
Unit 2 Walk-throughs or Demonstrations	Oct 2014	Not Started	
Unit 2 Implementation Outage *	Oct 2014	Not Started	
Submit 6 Month Status Report	Feb 2015	Not Started	
Submit 6 Month Status Report	Aug 2015	Not Started	
Unit 1 Walk-throughs or Demonstrations	Oct 2015	Not Started	
Unit 1 Implementation Outage *	Oct 2015	Not Started	
Submit Completion Report	Fall 2015	Not Started	

\*Full compliance after second listed refueling outage

**4 Changes to Compliance Method**

There are no changes to the compliance method as documented in the Overall Integrated Plan (Reference 1 of this enclosure).

**5 Need for Relief/Relaxation and Basis for the Relief/Relaxation**

Vogtle Electric Generating Plant - Units 1 and 2 expects to comply with the order implementation date and no relief/relaxation is required at this time.

**6 Open Items from Overall Integrated Plan and Draft Safety Evaluation**

The following tables provide a summary of the open items documented in the Overall Integrated Plan or the Draft Safety Evaluation (SE) and the status of each item.

Overall Integrated Plan Open Item	Status
1. Structure, content and details of the Regional Response Center playbook will be determined.	SAFER Team developing Pilot Playbook

Draft Safety Evaluation Open Item	Status
None Received to date	N/A

**7 Potential Draft Safety Evaluation Impacts**

There are no potential impacts to the Draft Safety Evaluation identified at this time.

**8 References**

The following references support the updates to the Overall Integrated Plan described in this enclosure.

1. Vogtle Electric Generating Plant - Units 1 and 2 Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049),” dated February 27, 2013.
2. NRC Order Number EA-12-049, “Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events,” dated March 12, 2012.

**9 Other Additional Information**

The following information provides clarity or corrections to the Overall Integrated Plan but do not constitute a change in strategy:

Enclosure to NL-13-1764  
First Six-Month Status Report of FLEX Implementation

1. Prior to depletion of the first CST, the TDAFW pump (or SG FLEX pump, as applicable) will require makeup from the second CST. The time to align the second CST for SG injection (table item 12) has been determined to be 24 hours versus 37 hours as stated in Reference 1 of this enclosure. This is due to a conservative change in the CST level from the low level alarm value to the technical specification low level.
2. Based on a more accurate calculation, the volume of de-mineralized water assumed in the RMWST has been adjusted from 127,050 gallons to 148,000 gallons, which increases the time this water source is available from 25 hours to 30 hours.
3. Instead of relying on the RRC for some Phase 3 cooling, repowering of the CCW and support systems such as room coolers and motor coolers will be performed. This Phase 3 strategy will continue to evolve as Phase 3 equipment is defined.
4. The FLEX primary 480V FLEX Diesel Generator connection point will be outside of plant structures but designed for protection from the plant hazards.