

June 1, 2004

MEMORANDUM TO: Stephanie M. Coffin, Acting Chief, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

FROM: Christopher Gratton, Sr. Project Manager, Section 1 /RA/  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

SUBJECT: DOCKETING OF QUESTIONS AND RESPONSES TRANSMITTED  
ELECTRONICALLY OR BY FACSIMILE (TAC NOS.MA8627, MA8628,  
MC1056, MC1057, MC1058, MC1059, MC1060, AND MC1061)

The purpose of this memo is to docket facsimile and e-mail correspondence between the Nuclear Regulatory Commission (NRC) and the Southern Nuclear Operating Company (SNC) for various applications currently under review by the NRC staff.

Attachment 1 contains a request for additional information (RAI) sent May 10, 2004, regarding the proposed relocation of the SNC Emergency Operations Facility (EOF). The staff asked an additional question on this subject by facsimile on May 28, 2004, which is included as Attachment 3. In addition, the NRC staff docketed an e-mail response from the licensee based on a question asked during a teleconference that occurred on May 3, 2004, between members of the NRC and SNC staffs regarding the relocation of the SNC EOF. This information can be found at Accession No. ML041310211 in the Agencywide Documents Access and Management System.

Attachment 2 contains an RAI sent May 11, 2004, regarding the assurance of equipment operability during design-basis conditions (Generic Letter 96-06).

The NRC staff plans to discuss the draft questions contained in Attachments 1 and 2 with the licensee in a future conference call.

This memorandum and the attached questions do not convey or represent an NRC staff position regarding the licensee's requests.

Docket Nos. 50-321, 50-388, 50-424 and 50-425

Attachments:

1. RAI sent 05/10/2004
2. RAI sent 05/11/2004
3. RAI sent 05/28/2004

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**DRAFT REQUEST FOR ADDITIONAL INFORMATION (RAIs)**  
**REGARDING EMERGENCY OPERATIONS FACILITY (EOF) RELOCATION FOR**  
**FARLEY NUCLEAR PLANT (FNP), DOCKET NOS. 50-321 AND 50-366;**  
**HATCH NUCLEAR PLANT (HNP), DOCKET NOS. 50-348 AND 50-364; AND**  
**VOGTLE ELECTRIC GENERATING PLANT (VEGP), DOCKET NOS. 50-424 AND 50-425**  
**SOUTHERN NUCLEAR OPERATING COMPANY**

By letter #NL-03-1792, dated October 16, 2003 (Agencywide Documents Access and Management System (ADAMS) accession no. ML032950056), Southern Nuclear Operating Company (SNC) submitted proposed revisions to the emergency plans (E-Plans) for FNP, HNP and VEGP for the consolidation of existing Corporate Emergency Operations Center (CEOC), existing on-site EOFs, and near-site backup EOFs for the three sites into a single EOF located in Birmingham, AL at the SNC Corporate Headquarters. Responses to Request for Additional Information (RAI) were subsequently received from SNC by letter #NL-04-0593, dated April 15, 2004 (ML041180540).

The NRC staff has the following questions or requests related to SNC's Response to RAIs. (Previous RAI responses referenced in the following questions and requests can be found in the licensee's April 15, 2004, letter)

**RAI-104:** Provide appropriate page changes to respective E-Plans that implement plan revisions to be made as stated in the following RAIs responses. In addition, provide a matrix reflecting applicable sections, tables, figures, etc. of respective plan(s) for each RAI response listed.

- |                                 |                             |
|---------------------------------|-----------------------------|
| 1. SNC Response to RAI-005      | 2. SNC Response to RAI-075  |
| 3. SNC Response to RAI-017/018  | 4. SNC Response to RAI-078  |
| 5. SNC Response to RAI-034      | 6. SNC Response to RAI-079  |
| 7. SNC Response to RAI-035      | 8. SNC Response to RAI-083  |
| 9. SNC Response to RAI-038      | 10. SNC Response to RAI-085 |
| 11. SNC Response to RAI-039     | 12. SNC Response to RAI-086 |
| 13. SNC Response to RAI-040     | 14. SNC Response to RAI-087 |
| 15. SNC Response to RAI-043     | 16. SNC Response to RAI-088 |
| 17. SNC Response to RAI-044     | 18. SNC Response to RAI-089 |
| 19. SNC Response to RAI-049     | 20. SNC Response to RAI-090 |
| 21. SNC Response to RAI-053     | 22. SNC Response to RAI-093 |
| 23. SNC Response to RAI-057     | 24. SNC Response to RAI-094 |
| 25. SNC Response to RAI-062     | 26. SNC Response to RAI-095 |
| 27. SNC Response to RAI-069/070 | 28. SNC Response to RAI-096 |
| 29. SNC Response to RAI-071     | 30. SNC Response to RAI-100 |
| 31. SNC Response to RAI-074     |                             |

**RAI-105:** Retention of non-delegable duties of the Emergency Director (ED) on-site is a deviation from NUREG-0696, Section 4.1 guidance that the EOF have facilities for the

management of “overall” licensee emergency response. Provide justification for the SNC determination in SNC’s Response to RAI-001 that the retention of non-delegable duties of the Emergency Director (ED) on-site is prudent and effective in the management of overall emergency response.

**RAI-106:** Provide changes to Section B.5 in Appendix 7 of the VEGP, HNP and FNP E-Plans to reflect description of responsibilities for protective action recommendation determination as stated in SNC Response to RAI-002.

**RAI-107:** Provide changes to Section B.1 in Appendix 7 of the VEGP, HNP and FNP E-Plans to reflect the information provided in SNC’s Response to RAI-003 that the EOF Manager is responsible to ensure that necessary support is provided to the SNC Newswriter, the SNC Spokesperson, and the Public Information Director to ensure timely and accurate information flow to the public through the near-site news centers.

**RAI-108:** Provide changes to the drill/exercise frequency as described in Section G.1.2 to Appendix 7 of the VEGP, HNP and FNP E-Plans to reflect SNC’s Responses to RAI-006 and RAI-020, which states that “[a]t least 1 activation every 5 years will require a concurrent EOF support response for more than one SNC site similar to major element requirement as specified in NUREG-0654.”

**RAI-109:** Provide changes to Appendix 7 of the VEGP, HNP and FNP E-Plans to reflect the SNC’s Response to RAI-009 that “[i]f personnel where to be dispatched to the sites, then personnel protection equipment would be available from the local EMA [*emergency management agency*] or from one of the unaffected SNC plant sites.”

**RAI-110:** Provide change to Section A.3 in Appendix 7 of VEGP, HNP and FNP E-Plans to reflect the SNC Response to RAI-010, which states that “[i]t is SNC’s goal to begin notification of all required on-call Emergency response Organization (ERO) personnel as soon as possible (< 15 minutes) following the declaration of an Alert emergency or higher at any SNC nuclear site.” In addition, include a listing of the minimum EOF staff positions required to declare the EOF operational, consistent with SNC’s Responses to RAI-010 and RAI-012, in Appendix 7 of VEGP, HNP and FNP E-Plans.

**RAI-111:** Provide changes to Table B-1 (VEGP and HNP E-Plans) and Table 3 (FNP E-Plan) to reflect specific EOF positions listed in SNC’s Response to RAI-011 that are being used to meet the 60-minute augmentation requirement under EOF Direction and Notification/Communication categories.

**RAI-112:** Describe in Appendix 7 to VEGP, HNP and FNP E-Plans what positions will be augmented (i.e., double staffed, or other means) to support multi-station events requiring the activation of the EOF, and what guidance on EOF staff augmentation will be provided to ensure required staff are retained, briefed and assigned in a timely manner following arrival at the EOF. In addition, discuss how actions of augmented positions will be coordinated to maintain effect command and control.

**RAI-113:** The SNC’s Response to RAI-016 provides for previous SRO experience in 7 specific EOF positions. Clarify whether previous SRO experience will be station, type (PWR/BWR), or

design (GE, Westinghouse, etc.) specific. In addition, provide changes to Table 2 (Corporate Emergency Organization Training Matrix) in Appendix 7 to VEGP, HNP and FNP E-Plans to reflect specific experience requirements stated in SNC Response to RAI-016.

**RAI-114:** Describe in Table 2 (Corporate Emergency Organization Training Matrix) to Appendix 7 of the VEGP, HNP and FNP E-Plans, what training is provided for Dose Assessment Supervisors and Dose Analysts on release pathways and other station-specific aspects that may impact dose projections between stations.

**RAI-115:** RAI-019 requested the licensee to clarify the statement in Enclosure 1 of the application that “[p]eriodic emergency response augmentation drills will be used to verify staff response capabilities.” SNC’s Response to RAI-019 states that existing EOF drills/exercises will be used; however, licensee does not indicate how these drills/exercises will verify staff response capabilities, since they are normally not unannounced or conducted during off-hours. Provide documented results from an unannounced, off-hours augmentation drill(s) that supports the licensee’s contention that the proposed minimum staffing for the SNC Corporate EOF can be obtained and the facility declared operational within 75 minutes of a simulated event classification.

**RAI-116:** Label Figure 2 in Appendix 7 of the VEGP, HNP and FNP E-Plans to indicate the location of the designated NRC Office in the proposed SNC Corporate EOF.

**RAI-117:** Provide changes to Appendix 7 of the VEGP, HNP and FNP E-Plans to incorporate SNC’s Response to RAI-023 regarding the potential need for the monitoring of radiological contamination on equipment and personnel from the utility, contractor or State/local agencies that may travel from within the 10-mile Emergency Planning Zone of the affected station to the SNC Corporate EOF.

**RAI-118:** Provide changes to applicable sections of the VEGP, HNP and FNP E-Plans to incorporate SNC’s Responses to RAI-024, RAI-025, RAI-027 and RAI-028, which describes communications capabilities for each of the three sites at the proposed SNC Corporate EOF.

**RAI-119:** Provide changes to applicable sections of the VEGP, HNP and FNP E-Plans to incorporate SNC’s Responses to RAI-022, RAI-029 and RAI-031, that describes data acquisition and display capabilities for each of the three sites at the proposed SNC Corporate EOF.

**RAI-120:** Provide consistent titles for station data links to proposed SNC Corporate EOF in the applicable sections and Appendix 7 of the VEGP, HNP and FNP E-Plans.

**RAI-121:** SNC’s Response to RAI-032 reflects EOF communications capabilities, but does not address the RAI-032 inquiry regarding technical data capabilities based on criteria in Sections 4.7 and 4.8 of NUREG-0696 for EOF data system equipment, technical data, and data systems. Please provide a response addressing these areas of the NRC staff’s previous question in RAI-032.

**RAI-122:** SNC’s Response to RAI-033 states that “[t]he requirements of Table B-1 will continue to be met at all times during facility activation.” However, Table B-1 (VEGP / HNP E-Plans) and

Table 3 (FNP E-Plan) only identify the positions for EOF Direction (i.e., EOF Manager) and Notifications/Communications (i.e., ENN Communicator). These positions are 60-minute augmentation positions and do not reflect minimum staffing positions needed to declare facility operational and perform key EOF functions. Clarify licensee intent in applicable sections of the VEGP, HNP and FNP E-Plans for SNC to meet minimum EOF staffing, as specified in SNC Responses to RAI-010 and RAI-012, at all times during facility activation.

**RAI-123:** Provide changes to Section 2.1.1 of the VEGP E-Plan, Section B -- Item 1 of the HNP E-Plan, and applicable section of the FNP E-Plan, to clearly address SNC Response to RAI-036, which states that “[i]t is the intent of the SNC that the ED will be transferred from the CR [Control Room] to the TSC as soon as practicable.”

**RAI-124:** Provide changes to applicable sections of the VEGP, HNP and FNP E-Plans to address SNC’s Response to RAI-048, which states that the “[u]naffected EOF Manager will be available to assist the affected EOF Manager in Company Spokesperson interface activities.”

**RAI-125:** Provide revised memorandum of understanding between the State of South Carolina and SNC, as stated in SNC Response to RAI-050, to reflect that SNC will arrange for air transportation of South Carolina personnel to the EOF upon request.

**RAI-126:** Provide the changes to Section F.5 (Nuclear Steam Supply System Vendor) to Appendix 7 in VEGP, HNP and FNP E-Plans to reflect SNC’s Responses to RAI-052, RAI-077 and RAI-098, that states that the appropriate NSSS vendor is specified in the applicable section of the respective plans.

**RAI-127:** Provide the changes to Section II.C.2.f to the FNP E-Plan that eliminates the inconsistency with Section F.2.4 to Appendix 7 and addresses SNC’s Response to RAI-076, that states that the Georgia Power Company (GPC) Central Laboratory will provide offsite monitoring, sample analysis and dosimetry processing, and will be augmented by outside vendors as necessary.

**RAI-128:** Provide the changes to VEGP, HNP and FNP E-Plans, as applicable, to clarify emergency response support provided by ABS/EQE Inc. (formerly PLG), i.e., meteorological data source, etc., versus program maintenance support for QA on dose modeling.

**RAI-129:** SNC Response to RAI-089 does not address NRC comment that under Activation and Staffing of Emergency facilities in Section H to the HNP E-Plan, while stating that overall direction and control is exercised from the TSC for an Alert situation, no guidance is provided for a Site Area or General Emergency. Provide response to RAI-089 inquiry.

**RAI-130:** Provide changes to applicable section of the VEGP, HNP and FNP E-Plans to address SNC Response to RAI-091, which states that “SNC plant site meteorological data is available by the integrated display system. Should this data link become unavailable the data is obtained manually via telephone with plant staff in the CR and TSC.”

**RAI-131:** Provide changes to Section I of HNP E-Plan, and the VEGP and FNP E-Plans as appropriate, to address SNC’s Response to RAI-092, which states that “Dose projections will be transferred to the EOF as soon as practicable from the TSC, to relieve the TSC of unnecessary

burden; however, the TSC will maintain the capability of dose projections should the EOF not be available.”

**RAI-132**: Provide changes to the VEGP, HNP and FNP E-Plans that describe provisions for the relocation of NRC staff, if requested, from the proposed SNC Corporate EOF to a near-site location, including licensee interfaces and communications.

**DRAFT**  
**REQUESTS FOR ADDITIONAL INFORMATION**  
**ASSURANCE OF EQUIPMENT OPERABILITY**  
**DURING DESIGN BASIS ACCIDENT CONDITIONS**  
**SOUTHERN NUCLEAR OPERATING COMPANY**  
**VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2**  
**DOCKET NUMBERS: 50-424 AND 50-425**

In your response dated March 29, 2004, to our request for additional information, you indicated that Nuclear Service Cooling Water (NSCW) containment supply check valves are not credited with being "leak tight" and therefore, a surveillance to confirm that the check valves are leak tight is not necessary. However, your response dated March 29, 2004, does state that the analyses instead "assume there will be minimal draining through the supply lines."

Please:

1. Identify the maximum back leakage through the NSCW containment supply check valves that is allowed consistent with the analysis that was performed, and establish surveillance requirements that periodically confirm (consistent with inservice testing program requirements) that the allowed seat leakage remains less than that assumed in the waterhammer analysis, or
2. Redo the waterhammer analysis without crediting the check valves for inhibiting void formation in the supply lines, and confirm that the check valves do not have to be credited for inhibiting back leakage.

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**REGARDING EMERGENCY OPERATIONS FACILITY (EOF) RELOCATION FOR**  
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**VOGTLE ELECTRIC GENERATING PLANT (VEGP), DOCKET NOS. 50-424 AND 50-425**  
**SOUTHERN NUCLEAR OPERATING COMPANY**

The licensee has agreed to perform a drill, which would involve the activation of the proposed Southern Nuclear Company common Emergency Operations Facility (EOF) in response to events involving at least two stations that would require EOF activation. When discussed with the licensee, the NRC staff stressed that this drill needs to demonstrate the capability of the proposed common EOF to support EOF activities simultaneously for multiple stations. This should be consistent with 10 CFR 50.47(b)(14) and NUREG-0696 Section 4.2. Drill objectives should demonstrate: (1) the competition for station priorities that would impact EOF resource allocation; (2) the ability to communicate event information to NRC, State and local agencies for events at multiple stations requiring offsite activation; (3) the development of news releases and communications to the Joint Information Center /Emergency News Center for events at multiple stations; (4) the performance of simultaneous dose projections from the EOF to verify release status/conditions for events at multiple stations, and (5) the mobilization of field monitoring teams for multiple stations and the transfer of control to the EOF.

Discuss how SNC plans to meet these objectives during the upcoming drill.