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SOUTHERN COMPANY

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ND-09-0008

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

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4 Combined License Application
Response to Request for Additional Information Letter No. 024

Ladies and Gentlemen:

By letter dated March 28, 2008, Southern Nuclear Operating Company (SNC) submitted an application for combined licenses (COLs) for proposed Vogtle Electric Generating Plant (VEGP) Units 3 and 4 to the U.S. Nuclear Regulatory Commission (NRC) for two Westinghouse AP1000 reactor plants, in accordance with 10 CFR Part 52. During the NRC's detailed review of this application, the NRC identified a need for additional operating organizational information required to complete their review of the COL application's Final Safety Analysis Report (FSAR) Section 13.1, "Organizational Structure of Applicant." By letter dated December 19, 2008, the NRC provided SNC with Request for Additional Information (RAI) Letter No. 024 concerning this operating organizational information need. This RAI letter contains three RAI questions numbered 13.01.02-13.01.03-1, -2 and -3. The enclosure to this letter provides the SNC response to these RAIs.

If you have any questions regarding this letter, please contact Mr. Wes Sparkman at (205) 992-5061.

D092
NRO

Mr. J. A. (Buzz) Miller states he is a Senior 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,

SOUTHERN NUCLEAR OPERATING COMPANY

Joseph A. (Buzz) Miller

Sworn to and subscribed before me this 16 *day of* January, *2009*

Notary Public: Gloria D. Bui

My commission expires: 05/06/09

JAM/BJS/lac

Enclosure: Response to NRC RAI Letter No. 024 on the VEGP Units 3 & 4 COL Application Involving Operating Organizational Information

cc: Southern Nuclear Operating Company
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Southern Nuclear Operating Company

ND-09-0008

Enclosure

Response to NRC RAI Letter No. 024

on the VEGP Units 3 & 4 COL Application

Involving

Operating Organizational Information

FSAR Section 13.1, Organizational Structure of Applicant

eRAI Tracking No. 1722

NRC RAI Number 13.01.02-13.01.03-1:

Standard Review Plan Section 13.1.2 – 13.1.3, "Operating Organization," section I.2.C requests the applicant to provide a description, for each position, of the functions, responsibilities, and authorities and, where applicable, required interfaces with offsite personnel or positions identified in Section 13.1.1 of the application. Such interfaces include defined lines of reporting responsibilities (e.g., from the plant manager to the immediate superior), lines of authority, and communication channels.

Where in the application is this information for the following positions located:

v. licensed operators

vi. nonlicensed operators

vii. technical supervisors

viii. radiation protection supervisors

ix. instrumentation and controls maintenance supervisors

x. equipment maintenance supervisors

xi. fire protection supervisors

xii. quality assurance supervisor (if part of the plant staff)?

SNC Response:

FSAR Subsection 13.1.1.2 discusses in broad terms the functions and general reporting responsibilities of management in each functional area. A more detailed description of responsibilities for Operations Department personnel is included in FSAR Subsection 13.1.2.1.2.1; however, not all of the positions listed in the question are covered in detail in the FSAR. To address this RAI, the following changes will be made to the FSAR at the next revision: FSAR Subsections 13.1.2.1.1.and 13.1.2.1.2.1 will be revised to discuss the above functions in greater detail and associated changes will be made to FSAR Table 13.1-201. Note that in the final revision to these sections, the numbering may change to follow the standard numbering convention. The numbering below is for tracking purposes based on the insertion locations for the text in the existing COL application. Conforming changes to organization figures will be provided in the next revision to the application.

Associated VEGP COL Application Revisions:

1. Revise COLA, Part 2, FSAR Chapter 13, Section 13.1.2.1.1 to add the following new Sections:

13.1.2.1.1.1 Engineering Support Manager

The Engineering Support Manager reports directly to the Site Engineering Manager. The Engineering Support Manager is responsible for providing technical direction to other departments regarding the safe, efficient, and reliable operation of the systems and for reactor engineering. Along with the Engineering Support supervisors, the Engineering Support Manager provides direction and oversight for the system engineers, program engineers, reactor engineers, and Non-Destructive Examination (NDE) specialists/coordinator. The Engineering Support Manager also has the following responsibilities:

- Provide technical direction for equipment reliability review function.
- Act as the chairperson for the Equipment Reliability Board (ERB).
- Review and approve Temporary Modifications.

13.1.2.1.1.2 Systems Engineering Supervisor

Each Systems Engineering Supervisor reports directly to the Engineering Support Manager. The Engineering Supervisor provides oversight to systems or reactor engineers. The supervisor also has the following responsibilities:

- Provide technical direction to other departments regarding the safe, efficient, and reliable operation of systems and technical direction related to reactor engineering (system engineers and reactor engineers).
- Ensure training and qualification of personnel in accordance with applicable Engineering Training procedures.
- Complete assigned surveillance testing in accordance with frequencies in the Technical Specifications.
- Ensure proper design configuration control of structures, systems, and components.
- Function as acting Engineering Support Manager when necessary.

13.1.2.1.1.3 Programs Engineering Supervisor

The Programs Engineering Supervisor reports directly to the Engineering Support Manager and is responsible for duties defined under the Systems Engineering Supervisor in 13.1.2.1.1.2. In addition to those responsibilities, this programs supervisor also provides oversight to the programs engineers.

13.1.2.1.1.4 Design Manager

The Design Manager serves as the key design lead for the nuclear plant and functions as the primary interface between the Major Projects and Design Support departments in Corporate and the site's Change Control Board (CCB). Along with the Design Supervisor, the Design Manager facilitates design change package development and implementation. The Design Manager also has the following responsibilities:

- Provide technical oversight and approval of design products generated by the Design department.
- Ensure changes to plant design are technically adequate.
- Maintain administrative control of design calculations.
- Establish administrative controls for technical software.
- Interface with contracted Architect Engineers and other engineering firms providing design.
- Interface with Corporate Stress Analysis, Fire Protection and Environmental Qualification groups in Engineering Programs providing design.
- Ensure training and qualification of department personnel.

13.1.2.1.1.5 Performance Improvement Supervisor

The Performance Improvement Supervisor reports directly to the Site Support Manager and provides oversight to the Performance Improvement engineers and the Site Licensing Principal Engineer. The supervisor also ensures training and qualification of personnel is performed in accordance with applicable Training procedures. Activities related to this responsibility are:

- Monitor and disseminate Operating Experience to plant.
- Support licensing and regulatory compliance activities.
- Monitor effectiveness of Corrective Action Program.
- Maintain Commitment Tracking Program.
- Coordinate the Human Performance Improvement Program.
- Ensure adequate and timely periodic reporting to all appropriate agencies.
- Coordinate the development and updating of performance indicators.
- Coordinate plant Self-Assessment Program and benchmarking.

13.1.2.1.1.6 Fire Protection Engineer

The Fire Protection Engineer is responsible for the following:

- Fire protection program requirements, including consideration of potential hazards associated with postulated fires, knowledge of building layout, and system design.
- Design, maintenance, surveillance, and quality assurance of fire protection features (e.g., detection systems, suppression systems, barriers, dampers, doors, penetration seals and fire brigade equipment).
- Fire prevention activities (administrative controls and training).
- Fire brigade organization and training.
- Pre-fire planning.

In accordance with Regulatory Guide 1.189, the engineer in charge of fire protection is a graduate of an engineering curriculum of accepted standing and has completed not less than six years of engineering experience, three of which were in a responsible position in charge of fire protection engineering work. The engineer in charge of fire protection is trained and experienced in fire protection and nuclear plant safety or has available personnel who are trained and experienced in fire protection and nuclear plant safety.

13.1.2.1.1.7 Plant Health Physics Manager

The Plant Health Physics Manager reports to the Plant Manager and serves as the "Radiation Protection Manager" for the facility referenced in Regulatory Guides 8.8 and 8.10. The Plant Health Physics Manager has overall responsibility for the radiation protection program, has responsibility for plant activities involving radiological safety, has the authority to prevent unsafe work practices, and directs steps to prevent any unnecessary radiation exposure. The Plant Health Physics Manager will ensure that Health Physics activities comply with the requirements of the plant operating license, Technical Specifications, approved fleet and plant procedures Security Plan, Emergency Plan, Quality Assurance Program, and applicable local, site, and federal regulations. The Plant Health Physics Manager must meet or exceed the requirements of Regulatory Guide 1.8.

13.1.2.1.1.8 Plant Health Physics Support Supervisor

The Plant Health Physics Support Supervisor reports to the Plant Health Physics Manager and is responsible for, but not limited to, the Health Physics support programs, like Dosimetry, ALARA, Rad Waste, Respiratory Protection, and fixed and portable radiological instrumentation. The Health Physics Support Supervisor may substitute for and perform the duties of the Plant Health Physics Manager when designated and qualified under Regulatory Guide 1.8.

13.1.2.1.1.9 Plant Health Physicist

The Plant Health Physicist reports to the Plant Health Physics Manager and is responsible for, but not limited to, monitoring Health Physics programs and indicators which include the ALARA program, radioactive waste management, shipping of radioactive material/waste, and outage preparedness. The Plant Health Physicist tracks and evaluates performance indicators, supports industry benchmarking, implements special projects, and provides technical support. The Plant Health Physicist may substitute for and perform the duties of the Plant Health Physics Manager when designated and qualified.

13.1.2.1.1.10 Plant Health Physics Foreman

Health Physics Foremen report to the Plant Health Physics Manager and the Plant Health Physics Support Supervisor and are directly responsible for, but not limited to, directing, scheduling, and coordinating the activities of the HP Technicians to support plant activities.

13.1.2.1.1.11 Health Physics Technician

Health Physics Technicians report to Health Physics Supervision. Their responsibilities include the following:

- Monitoring radiation controlled areas on a regularly scheduled basis using fixed and portable survey instruments to evaluate contamination, radiation fields and airborne radiation levels and measure dose rates for job coverage.
- Storing, issuing, and testing of respiratory protection equipment.
- Support calibrating fixed and portable radiation survey instruments.
- Providing health physics coverage of plant personnel to ensure safe radiological practices.
- Radiological evaluations of area decontamination activities.
- Prepare and authorize Radiation Work Permits.
- Provide support to the Dosimetry Program, as needed.

13.1.2.1.1.12 Maintenance Manager

The Maintenance Manager defines, communicates, and reinforces high standards for performance of maintenance activities and holds himself and others accountable for meeting those standards. The Maintenance Manager is responsible for:

- Establishing department goals and objectives.

- Ensuring that the roles and responsibilities of maintenance management personnel are communicated and reinforced.

- Setting standards for training of maintenance personnel to ensure that they have the necessary knowledge and skills

- Maintaining the plant materiel condition.

13.1.2.1.1.13 Maintenance Superintendent

The Maintenance Superintendent reinforces standards of performance as described in the Maintenance Manager's responsibilities and performs specific additional Maintenance Department roles, such as:

- Oversight for the maintenance support activities.

- Responsible for day-to-day administrative, training and qualification, and budget activities.

- Oversight of the Daily and Outage Planning Supervisors.

- Responsible for the Maintenance Procedure Program.

- Managing the Corrective Action Program for Maintenance.

- Responsible for the Predictive Maintenance Program.

13.1.2.1.1.14 Mechanical Maintenance, Electrical Maintenance, and Instrument and Controls Supervisors

Maintenance supervisors are responsible for:

- Coaching workers and reinforcing expectations and standards. During oversight of work activities, reinforcing positive behaviors, identifying when worker performance does not meet expectations, and addressing performance shortfalls.

- Ensuring that qualifications and proficiency of assigned personnel are consistent with the assigned work.

- Actively participating in training development and delivery, and helping identify performance gaps that can be addressed in training.

- Promoting craft ownership of equipment, processes, and programs to facilitate improvement.

- Executing the work schedule.

13.1.2.1.1.15 Fleet Oversight Supervisor and Staff

The Fleet Oversight Supervisor (FOS) is responsible to the Fleet Oversignt Manager (FOM) for the direction of the assigned staff. The staff shall be located either at the plant site or the corporate office, and shall provide an independent review and evaluation of the implementation of the Quality Assurance Program (QAP).

In accordance with the QAP, the FOS shall have the authority from the FOM to stop or recommend stopping, through appropriate channels, unsatisfactory work which is not in compliance with the QAP.

Specific duties and the responsibilities of the FOS are:

- Developing and implementing procedures for audits, surveillances, procedure reviews, training and qualification and associated activities.

Specific duties and the responsibilities of the Fleet Oversight Staff are:

- Evaluating site and corporate activities for conformance to QAP requirements and procedures.
- Preparing a schedule of audits to be performed on site and corporate organizations and activities (line organization, contractors and/or suppliers, as appropriate).
- Performing planned and periodic audits of site and corporate organizations and activities (line organization, contractors and/or suppliers, as appropriate).
- Following up on audit findings until resolved and closed out.
- Preparing reports of audits, surveillances, reviews and other assigned activities and providing them to the FOM and appropriate line management.

2. Revise existing COLA, Part 2, FSAR Chapter 13, Section 13.1.2.1.2.1 text as noted and replace with the following new Sections:

13.1.2.1.2.1 Operations Manager

~~The operations manager has overall responsibility for the day-to-day operation of the plant. Reporting to the operations manager are the operations superintendents, operation support superintendent, and the shift managers. The operations superintendent (daily) directs day-to-day planning and provides technical support; the operations support superintendent supervises staff support functions and coordinates training of operations personnel. The operations superintendent (outage) prepares for and conducts outage-related activities and oversees outage work activities, surveillances, and tests.~~

~~The shift manager is responsible for seeing that plant operations are conducted in accordance with appropriate standing orders, unit operating procedures, and technical specifications. The shift manager's principal responsibility is ensuring~~

~~safe operation during his assigned shift. The shift manager shall possess an SRO license.~~

~~The shift technical advisor position meets the intent of NUREG-0660, as clarified by NUREG-0737, Item I.A.1.1. The shift technical advisor position may be eliminated if the qualifications of the shift manager, shift supervisor, or SRO-licensed shift support supervisor meet the requirements of the shift technical advisor position. Section 13.2 describes shift technical advisor training, and Subsection 13.1.3 describes shift technical advisor qualifications.~~

~~A shift supervisor for each unit is under the supervision of the shift manager. Each shift supervisor shall possess an SRO license. Each shift supervisor is responsible for the safe and efficient operation of the unit. The shift supervisor for each unit keeps a record of the shift. The shift supervisor is responsible for directing and monitoring the activities of the ROs in accordance with appropriate standing orders, plant procedures, and technical specifications.~~

~~Also reporting to the shift supervisors are the shift support supervisors, plant operators, and systems operators.~~

~~Plant operators monitor the plant status and operate equipment as needed to maintain control of the various plant processes. Most of their duties are located in the control room; although, they may perform inspections in other areas of the plant.~~

The Operations Manager is responsible for the overall management of the Operations Department to ensure safe and efficient operation of the plant. The Operations Manager defines, communicates, and reinforces standards for performance. Reporting to him are the Outage Superintendent, Daily Superintendent, and Support Superintendent, and the Shift Managers. The Operations Manager:

- Ensures safe operation of the nuclear unit(s).
- Promotes a strong safety culture, with nuclear safety as an overriding priority.
- Establishes goals, objectives, and standards for operational activities.
- Provides direction in the training of operators.
- Monitors and assesses performance.
- Issues standing orders and special orders.

13.1.2.1.2.2 Operations Superintendents

The Outage Superintendent, Daily Superintendent, and Support Superintendent report to the Operations Manager and share the following duties and responsibilities:

- Provide direction to the Shift Managers for routine scheduling and coordination of Operations shift activities, including interfacing with other plant departments.

- Ensure plant operations are conducted per Technical Specifications, standing orders, the Offsite Dose Calculation Manual (ODCM) and approved procedures.

- Review and approve operating procedures, standing orders, and other special orders.

- May function as Operations Manager when designated.

- Supervise the preparation and review of plant operating procedures.

- Provide input to the Training Department for development and conduct of training and qualification of Operations Department personnel.

- Provide interface between Operations and other departments on administrative matters.

13.1.2.1.2.3 Shift Manager (SM)

The Shift Manager (SM) reports to the Operations Manager. The SM is the senior management representative on each shift and is responsible for the safe and efficient operation of the plant. The Shift Manager shall possess an SRO License. He has the following duties and responsibilities:

- Ensures plant operations are conducted in accordance with appropriate standing orders, the ODCM, unit operating procedures, and Technical Specifications.

- Maintains responsibility and oversight of activities that could affect core reactivity.

- Functions as Site Emergency Director when required.

- Has responsibility for the entire plant in the absence of the Site VP, Plant Manager, and Operations Manager. The SM has their authority, including issuing standing orders and other special orders, in their absence.

- Ensures the shift is properly manned, including the Fire Brigade.

- Provides leadership of crew in training and qualification programs.

13.1.2.1.2.4 Shift Supervisor (SS)

One Shift Supervisor (SS) is assigned to each operating unit on each shift. He is responsible for the safe and efficient operation of the assigned unit. Each SS shall possess an SRO License. The SS(s) report to the Shift Manager (SM) and have the following specific duties and responsibilities:

- Maintains responsibility and oversight of activities that could affect core reactivity.

- Ensures that plant operations are conducted per the Technical Specifications, ODCM, and approved procedures and standing orders.
- In charge of unit operation during startup, power operation, and shutdown.
- Supervise the Reactor Operators, Non-Licensed Operators, and Shift Support Supervisors to ensure proper performance of their assigned duties.
- Approves the removal of equipment and systems from service for maintenance, testing or operational activities.
- Authorizes maintenance and/or testing activities to be performed and ensures plant conditions are suitable for performing such activities. Maintains status of equipment, and determines operability of equipment upon return to service.
- Ensures equipment clearances and tagging functions are performed.
- Administers the Operations Surveillance program.

13.1.2.1.2.5 Shift Support Supervisor (SSS)

The SSS reports to the Shift Manager (SM) and have the following duties and responsibilities:

- Monitors performance of operator rounds, system and equipment lineups, surveillances, and other routine shift activities.
- Ensures shift operations are conducted per Technical Specifications, ODCM, and approved procedures.
- Authorizes maintenance and/or testing activities to be performed, and ensures plant conditions are suitable.
- Issues equipment clearances.
- Responds during fire emergencies and acts as the Fire Brigade Leader in directing the fire fighting efforts of the Fire Brigade, as required.
- Coordinates the Fire Protection program for on shift operations.
- Assists with administration of the Operations Surveillance program.

13.1.2.1.2.6 Shift Technical Advisor (STA)

The shift technical advisor position meets the intent of NUREG-0660, as clarifiedby NUREG-0737, Item I.A.1.1. The STA position may be eliminated if the qualifications of the Shift Manager, Shift Supervisor, or SRO licensed Shift Support Supervisor meet the requirements of the STA position. Section 13.2 describes STA training, and Subsection 13.1.3 describes STA qualifications.

The STA position has the following responsibilities:

- Maintain independence from the normal operations shift as much as necessary to be able to make objective evaluations of plant operations and to advise or assist plant supervision in correcting conditions that may compromise safe operations.

- Serves in an advisory capacity to the SS. Upon entry into emergency operating procedures, the STA monitors and reports Critical Safety Functions to the Shift Supervisor.

- Investigates the causes of abnormal or unusual events, assesses adverse effects on plant operation, and reports any abnormality to the SS.

13.1.2.1.2.7 Reactor Operator (RO)

The Reactor Operators report to the SS.

Duties and responsibilities include:

- Operate the reactor and power plant safely.

- Perform reactivity changes.

- Maintain a broad awareness of activities in the Main Control Room and the plant.

- Monitor and control key parameters during normal operation.

- Perform shift operations and surveillance testing per approved procedures, standing orders, and Technical Specifications.

13.1.2.1.2.8 Non-Licensed Operator (NLO)

Non-Licensed Operators report to the respective unit's Shift Supervisor (SS) or Support Shift Supervisor (SSS).

Duties and responsibilities include:

- Monitor plant auxiliary equipment and/or systems outside the main control room.

- Operate systems in the field at the direction of the control room or SSS.

- Perform rounds to ensure proper operation of equipment.

- Remove equipment from service and executes clearance orders; restores equipment to service and removes clearances as directed by the SS or SSS.

- Respond to fire emergencies as a member of the Fire Brigade and performing fire fighting activities as directed by the Fire Brigade Leader.

- Perform assigned Emergency Response duties.

3. Revise COLA, Part 2, FSAR Chapter 13, Table 13.1-201 as shown below:

Table 13.1-201

Nuclear Function	Function Position - ANSI/ANS-3.1-1993 section reference	Nuclear Plant Position (Site –Specific)	Expected Positions single unit	Expected additional positions 2nd unit
Under Engineering add a line:				
Engineering Support	Functional manager 4.3.9	Engineering Support Manager	1	-
Under Operations add a line:				
Operations, Outage	Functional manager 4.3.8	Operations Superintendent	1	-
Under Operations change lines 2 and 3 from:				
Operations, plant	Functional manager 4.3.8	Operations Superintendent	1	-
Operations, admin	Functional manager 4.3.8	Operations Superintendent	1	-
to:				
Operations, Daily	Functional manager 4.3.8	Operations Superintendent	1	-
Operations, Support	Functional manager 4.3.8	Operations Superintendent	1	-
Under Operations add a line:				
	Supervisor 4.4.2	Shift Support Supervisor	5	5

Under Operations: add a footnote to the line for Shift Technical Advisor stating:

"The shift technical advisor position may be eliminated if the qualifications of the shift manager, shift supervisor, or SRO licensed shift support supervisor meet the requirements of the shift technical advisor position."

NRC RAI Number 13.01.02-13.01.03-2:

Standard Review Plan Section 13.1.2 - 13.13, "Operating Organization," section I.2.D, asks the applicant to describe the delegation of authority that may be granted to operations supervisors and to shift supervisors, including the authority to issue standing or special orders.

Where in the application is this information?

SNC Response:

In FSAR Subsection 13.1.2.1.1, on page 13.1-15, the following statements provide the information requested: "...the shift manager is the plant manager's direct representative for the conduct of operations. The succession of authority includes the authority to issue standing or special orders as required."

NRC RAI Number 13.01.02-13.01.03-3:

Standard Review Plan Section 13.1.2 - 13.13, "Operating Organization," section I.2.F and RG 1.206, section C.I.13.1.2.2(3), "Plant Personnel Responsibilities and Authorities," asks that, if the station contains or if there are plans for it to contain power generating facilities other than those specified in the application and including fossil-fueled units, the applicant also describe in this section interfaces with the organizations operating the other facilities.

Where in the application is this information?

SNC Response:

The Owner Controlled Area where VEGP Units 3 and 4 will be located also has a six unit combustion turbine peaking plant (Plant Allen B. Wilson) and VEGP Units 1 and 2. Both Plant Wilson and VEGP 1 and 2 have their own operating organizations. VEGP 3 and 4 will also have an independent operating organization. It is not anticipated that there will be interfaces with the organizations operating Plant Allen B. Wilson or VEGP Units 1 and 2.