PMVogtleCOLPEm Resource

From: Sebrosky, Joseph
Sent: Friday, October 08, 2010 6:57 AM
To: PMVogtleCOLPEm Resource
Subject: Summary of September 30, 2010 Public Phone Call to Discuss Issues Associated with the Vogtle Units 3 and 4 Combined License Application Review
Attachments: ACRS Action Item Summary from 9-30 call - EP changes.docx; draft info for response to LTR 62 - 304070 EP .htm

MEMORANDUM TO: File (Vogtle Units 3 and 4 (Dockets 52-25 and 52-26)

From: Joseph Sebrosky, Project Manager
AP1000Projects Branch (NWE1)
Division of New reactor Licensing
Office of New Reactors

Subject: Summary of September 30, 2010 Public Phone Call to Discuss Issues Associated with the Vogtle Units 3 and 4 Combined License Application Review

The NRC headquarters attendees were:
Paul Pieringer, Tony Minarik, Bob Moody, Bruce Musico, John Rycyna, Denise McGovern, Pat Moulding (OGC), Rollie Berry, Joe Sebrosky, John Frost, and Judy Johnson

Participants on the call that supported the discussions for Southern were:
Amy Aughtman (SNC), Wes Sparkman (SNC), James Flowers (SNC), Ted Amundson (SNC), Eddie Grant (NuStart), and Neil Haggerty (NuStart)

In addition to the Southern participants several other members of the public attended the call

The agenda for the meeting appears below and the result of the discussion are provided below.

1. ACRS Action item related to Chapter 18

   Summary of Discussion: The description of this issue and a high-level summary is attached.

   Action: The staff and the applicant indicated that they would both consider whether the use of an EP ITAAC is appropriate (and needed), in order to address the TSC's capability to support multiple units at the same time during an emergency. The staff asked the applicant to propose an appropriate EP ITAAC. The applicant indicated that such an ITAAC could be associated with an EP drill.

2. License condition for Cyber security program and Physical security program

   Summary of Discussion: The staff indicated that the the applicant needs to make changes to FSAR table 13.4-201 to remove reference to a license condition for security program implementation and replace this with a reference to the regulation which provides requirements for when the security programs needs to be in place. The staff stated that it recognizes that Part 10 of the application is incorrect but no changes to Part 10 are needed because it is not part of the licensing basis.

   Action: Southern to revise its application to correct references in FSAR table 13.4-201 regarding security program implementation

3. Target set---TR-94 report—FSAR commitment/license condition.

   Summary of Discussion: The staff has reviewed the Westinghouse topical report and determined that no

changes are needed to the Vogtle COL application. The staff's basis is that the target sets will have to be identified and the applicant will have to have appropriate training in place in order to fulfill the security requirements in 10 CFR 73. Because 10 CFR 73 provides requirements regarding implementation any issue associated with the target sets will be subject to inspection and enforcement. Therefore, no further action is needed by the applicant.

4. Limits on 30/40 license to capture response VEGP RAI 1.05-1 (i.e., will not exceed Schedule C limits in 10 CFR 30.72, and will not possess uranium hexafluoride in quantities greater than 50 kilograms in a single container or 1000 kilograms total.) (Denise and me)

   Summary of Discussion: The applicant's draft response is attached to this summary. The staff indicated that it understood the applicant's technical basis for why portions of the emergency plan did not need to be implemented to support the Part 30 and 40 license request. However the staff noted that the draft response relied on statements that limits in 10 CFR 30 and 40 that require an emergency plan would not be exceeded.

   Action: Both the applicant and the staff indicated that they would consider whether the license should include restriction that byproduct material will not exceed Schedule C limits in 10 CFR 30.72, and source material will not allow possession of uranium hexafluoride in quantities greater than 50 kilograms in a single container or 1000 kilograms total. A followup discussion was tentatively scheduled for the 10/4/10 9:00 am public conference call.

5. Manual start of DGs

   Summary of Discussion: The staff did have a questions regarding the applicants revised response to a loss of large area fire question regarding manual starting of the diesel generators. Because the response is considered sensitive unclassified non-safeguards information the staff took an action to schedule a separate phone call with the applicant to provide feedback on the revised response.

6. Chapter 15 draft OI response

   Summary of Discussion: The staff deferred this discussion to the 9:00 am phone call scheduled for October 5, 2010.

Hearing Identifier: Vogtle_COL_Public
Email Number: 521

Mail Envelope Properties (36CF286628C20846A68047F24632330933FF934475)

Subject: Summary of September 30, 2010 Public Phone Call to Discuss Issues Associated with the Vogtle Units 3 and 4 Combined License Application Review
Sent Date: 10/8/2010 6:57:13 AM
Received Date: 10/8/2010 6:57:16 AM
From: Sebrosky, Joseph

Created By: Joseph.Sebrosky@nrc.gov

Recipients:
"PMVogtleCOLPEm Resource" <PMVogtleCOLPEm.Resource@nrc.gov>
Tracking Status: None

Post Office: HQCLSTR02.nrc.gov

Files	**Size**	**Date & Time**
MESSAGE	4684	10/8/2010 6:57:16 AM
ACRS Action Item Summary from 9-30 call - EP changes.docx	20311	
draft info for response to LTR 62 - 304070 EP .htm	87110	

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

Summary of material presented on ACRS open item on Vogtle SER.

NRC Staff (Paul Pieringer) outlined the ACRS open item:

> There may be different requirements for a TSC, depending on whether the facility supports – on a common site – a single reactor, multiple reactors of similar design, multiple reactors of different designs (e.g., the Vogtle site). What criteria does the NRC use to evaluate the HFE for the new, common Vogtle TSC, which will support all four units? In addition, how will the NRC ensure that Vogtle Units 1 & 2 will not affect the capability of the TSC to support Vogtle Units 3 & 4?

The intended response to the first question is that there is no specific criteria used to evaluate the HFE design of a common TSC. Acceptance is contingent upon validation, which may be carried out as part of an exercise or drill.

This position is supported by the following three points:

1) NUREG-0696 contains accepted guidance for the design and implementation of the EOF and TSC
2) Emergency drills validate HFE design for the TSC/EOF similar to the way the full scope simulator is used to validate the control room design
3) Common TSC & EOF's for operating plants have been approved.

Millstone 2 and 3, Limerick/Peach Bottom/TMI, and Vogtle/Hatch/Farley currently have common TSCs and/or EOFs. Differentiation of data between units, a key Human Factors attribute, is accomplished by data access limitations (only 1 unit can be displayed on a monitor at a time), configurable data displays, labeling and color coding. These HFE designs have been proven effective in single unit Emergency drills. Southern Nuclear Operating Company and NRC staff from the emergency planning area indicated a multiple unit drill was conducted to demonstrate the common EOF for Vogtle/Hatch/Farley was acceptable.

At this point NRC Staff (Bruce Musico), asked if Southern Nuclear Company planned to perform a drill where Units 1 & 2 would be included in the initial Unit 3 exercise. Southern replied that they did not plan such a drill but they would consider the option. The staff and the applicant indicated that they would both consider whether the use of an EP ITAAC is appropriate (and needed), in order to address the TSC's capability to support multiple units at the same time during an emergency. The staff asked the applicant to propose an appropriate EP ITAAC. The applicant indicated that such an ITAAC that would demonstrate the HFE-related capability, could be associated with an EP drill.

.

From: Aughtman, Amy G. [AGAUGHTM@SOUTHERNCO.COM]
Sent: Thursday, September 23, 2010 3:51 PM
To: McGovern, Denise; Sebrosky, Joseph
Cc: Sparkman, Wesley A.; 'Eddie Grant'; Joshi, Ravindra; 'Richard Grumbir'
Subject: draft info for response to LTR 62 - 30/40/70 EP

Categories: non hearing material

Denise and Joe,
Below is the draft response to Letter 62. This item has been tentatively identified for discussion on the Tuesday public call pending NRC reviewer availability, if necessary.
Please contact me or Eddie Grant with any questions.

Amy A.

NuStart Qb Tracking No. 4235
NRC eRAI No. 4980
VEGP RAI 01.05-01

A. Identify the physical form of the byproduct material that will be received, possessed, or used at (Units 3 and 4). If the byproduct material is "in unsealed form, on foils or plated sources, or sealed in glass," does it exceed the quantities in Schedule C in 10 CFR 30.72? If the quantities exceed Schedule C, provide either an evaluation showing the maximum dose to a person offsite would be less than 1 rem dose equivalent or 5 rems to the thyroid [10 CFR 30.32(i)(2)] or provide an emergency plan that meets the requirements of 10 CFR 30.32(i)(3). If compliance through the requirements of 10 CFR 30.32 (i)(3) is chosen, address how the implementation of the emergency plan prior to the receipt of byproduct material will be accomplished and reflect the implementation in FSAR Table 13.4−201, "Operational Programs Required by NRC Regulations."

B. In accordance with 10 CFR 40.31(j)(1), does the request for a Part 40 license involve authorization to receive, possess, or use uranium hexafluoride in excess of 50 kilograms in a single container or 1000 kilograms total? If either of the above quantities is exceeded, provide either an evaluation showing that the maximum intake of uranium by a member of the public due to a release would not exceed 2 milligrams [see 10 CFR 40.31(j)(2)] or an emergency plan for responding to the radiological hazards of an accidental release of source material and to any associated chemical hazards related to the material. [see 10 CFR 40.31(j)(3)].

Response:

No byproduct material will be received, possessed, or used at AP1000 units of a physical form that is "in unsealed form, on foils or plated sources, or sealed in glass," that exceeds the quantities in Schedule C in 10 CFR 30.72. Since the quantities do not exceed Schedule C, an emergency plan that meets the requirements of 10 CFR 30.32(i)(3) is not required. As such, the implementation of the emergency plan prior to the receipt of byproduct material will be removed from FSAR Table 13.4−201, "Operational Programs Required by NRC Regulations," and from Part 10 proposed License Conditions (LC#3, item C.4).

The request for a Part 40 license does not involve authorization to receive, possess, or use uranium hexafluoride in excess of 50 kilograms in a single container or 1000 kilograms total. Since the above quantities are not exceeded, an emergency plan for responding to the radiological hazards of an accidental release of source material and to any associated chemical hazards related to the material is not required. As such, the implementation of the emergency plan prior to the receipt of source material will be removed from FSAR Table 13.4−201, "Operational Programs Required by NRC Regulations."

As a result of the above discussed re-evaluations, the associated COL Application Revisions identified below will be included in a future COLA revision.

This response is expected to be STANDARD for each S-COLA.

Associated VEGP COL Application Revisions:

1. COLA Part 2, FSAR Chapter 13, Section 13.4, Table 13.4-201, item 14, Emergency Planning, will be revised to remove the following information related to materials.

(portions applicable to radioactive material)	10 CFR 30.32(i)(3) 10 CFR 40.31(j)(3) 10 CFR 70.22(i)(3)	Prior to initial receipt of byproduct, source, or special nuclear materials (excluding Exempt Quantities as described in 10 CFR 30.18)	10 CFR 30.32(i)(1) 10 CFR 40.31(j)(1) 10 CFR 70.22(i)(1)

2. COLA Part 10, proposed License Condition 3, Operational Program Implementation, item C, Receipt of Materials, will be revised from:

C.4 – Emergency Planning (applicable portions)

To read:

C.4 – Deleted