PMVogtleCOLPEm Resource

From:	Joshi, Ravindra
Sent:	Tuesday, July 26, 2011 4:19 PM
То:	PMVogtleCOLPEm Resource
Cc:	Segala, John; Sebrosky, Joseph; McGovern, Denise; Dinh, Thinh; Dreisbach, Jason; Anderson, Brian; Cruz, Jeffrey
Subject:	RE: Summary of July, 19, 2011, phone call to discuss proposed fire protection license conditions

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

From: Ravi Joshi, Senior Project Manager AP1000Projects Branch (NWE1) Division of New reactor Licensing Office of New Reactors

Subject: Summary of July, 19, 2011, phone call to discuss proposed fire protection license conditions

The NRC headquarters attendees were:

John Segala, Thinh Dinh, Ravi Joshi, Joe Sebrosky, Denise McGovern, and Brian Anderson

Industry Participants were: NuStart – Eddie Grant Southern – Amy Aughtman South Carolina Electric and Gas – Amy Monroe

The purpose of the call was to discuss proposed fire protection license conditions for the Vogtle and Summer combined licenses. The proposed license conditions were previously provided to Southern and SCE&G in an email dated July 18, 2011. This email appears below and can be found in ADAMS (ML11200A028).

The staff discussed the need for the proposed fire protection license conditions and indicated that the license conditions were discussed at a high-level in the safety evaluation reports (SER) for Vogtle and Summer. However, the fire protection license conditions discussed in the SERs discussed applicable portions of the fire protection program being in place prior to receipt of byproduct, special nuclear material (SNM) – nonfuel, and SNM – fuel. In developing the actual licenses for Vogtle and Summer, the staff proposed the wording below to provide more specificity on what "applicable" portions of the fire protection program entailed.

While in general agreement regarding the draft proposed license conditions defining what portions of the fire protection program needed to be in place prior to the receipt of byproduct, SNM – nonfuel, and SNM – fuel, industry noted that RG 1.189 allows for compensatory measures. Industry provided an example that not all of the fire protection system alarms would be available in the control room at the time of the receipt of these materials, and that fire protection compensatory measures may be put in place by the applicant consistent with RG 1.189.

The staff indicated that there was nothing in the Vogtle or Summer COL application discussing the use of such fire protection compensatory measures and, therefore, the staff did not evaluate the scenarios under which compensatory measures would be allowed. In general the staff indicated that some compensatory measures may be allowed under the proposed license condition subject to the licensee's performing 10 CFR 50.59 evaluations and determining that prior approval from the NRC was not needed. However, the staff also indicated that depending on the availability of fire protection features and the compensatory measure being considered, prior approval from the NRC may be needed.

Industry indicated that it would not be revising its application to discuss in further detail compensatory measures that could be considered for the fire protection program prior to the receipt of byproduct, SNM – nonfuel and SNM – fuel. Industry also indicated that if it had any additional comments it would provide them to the staff as soon as possible. The staff indicated that it would document the discussions in a phone call summary.

From: Joshi, Ravindra
Sent: Monday, July 18, 2011 11:23 AM
To: Aughtman, Amy G.; MONROE, AMY
Cc: Sebrosky, Joseph; Segala, John; Dinh, Thinh; PMVogtleCOLPEm Resource; McGovern, Denise
Subject: Re: Vogtle and Summer COLs Fire Protection License Conditions

Amy, Amy

See below for the revised wording for the fire protection program license condition for your info. We will be discussing this FP License condition in tomorrow's call.

Ravi Joshi

From: Dinh, Thinh
Sent: Friday, July 15, 2011 4:43 PM
To: Segala, John
Cc: Dreisbach, Jason; Lee, Samuel; McCann, Edward
Subject: RE: ACTION REQUESTED - Vogtle and Summer COLs Fire Protection License Conditions

John,

For consistency, the phrase "applicable portions" was taken from the Vogtle and Summer's proposed license conditions (Part 10). This phrase was used to clarify that <u>not all elements</u> of the site FP Program need to be fully implemented prior to initial fuel load. These include fire brigade, training programs, procedures and prefire plans development, combustible and ignition source control program, etc....

The proposed wordings give the impression that all elements of the FP program have to be fully implemented in the areas where special nuclear materials and/or new fuels are stored, which is not the case. Since RG 1.189, Section 6.2, identifies protective measures for areas that contain significant radioactive materials, I suggest the following revision:

- 1. The fire protection measures per RG 1.189 for designated storage building areas (including adjacent fire areas that could affect the storage area) are implemented before initial receipt of the byproducts or special nuclear materials that are not fuel (excluding exempt quantities as described in 10 CFR 30.18);
- 2. The fire protection measures per RG 1.189 for new fuel storage area (including adjacent fire areas that could affect the new fuel storage area) are implemented before receipt of fuel onsite;
- 3. All fire protection program features are implemented before initial fuel load

Thanks,

Thinh.

Hearing Identifier:	Vogtle_COL_Public
Email Number:	540

Mail Envelope Properties (BBC4D3C29CD0E64E9FD6CE1AF26D84D58829DFE570)

Subject: license conditions	RE: Summary of July, 19, 2011, phone call to discuss proposed fire protection
Sent Date: Received Date: From:	7/26/2011 4:19:16 PM 7/26/2011 4:19:16 PM Joshi, Ravindra
Created By:	Ravindra.Joshi@nrc.gov

Recipients:

"Segala, John" < John.Segala@nrc.gov> Tracking Status: None "Sebrosky, Joseph" <Joseph.Sebrosky@nrc.gov> Tracking Status: None "McGovern, Denise" < Denise.McGovern@nrc.gov> Tracking Status: None "Dinh, Thinh" <Thinh.Dinh@nrc.gov> Tracking Status: None "Dreisbach, Jason" <Jason.Dreisbach@nrc.gov> Tracking Status: None "Anderson, Brian" < Brian.Anderson@nrc.gov> Tracking Status: None "Cruz, Jeffrey" <Jeffrey.Cruz@nrc.gov> Tracking Status: None "PMVogtleCOLPEm Resource" < PMVogtleCOLPEm.Resource@nrc.gov> Tracking Status: None

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