B. L. "Pete" Ivey Vice President Regulatory Affairs

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October 23, 2012

Docket Nos.: 50-424

50-425

NL-12-2147

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

Vogtle Electric Generating Plant – Units 1 and 2
Southern Nuclear Operating Company's Initial Status Report 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)

Ladies and Gentlemen:

References:

- 1. NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events
- 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. Nuclear Energy Institute (NEI) Letter to NRC, *Industry Initiative on Procurement of Equipment for the Diverse and Flexible Coping Strategy (FLEX)*, dated February 24, 2012
- 4. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012

Ladies and Gentlemen:

On March 12, 2012, the Nuclear Regulatory Commission issued an order (Reference 1) to Southern Nuclear Operating Company (SNC). Reference 1 was immediately effective and directed SNC 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 requires submission of an initial status report by SNC 60 days following issuance of the final interim staff guidance. The final interim staff guidance (Reference 2) was issued August 29, 2012. The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference 1 within 60 days following issuance of Reference 2. This report confirms SNC has received Reference 2 and is in the process of evaluating the guidance for the purpose of establishing mitigation strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event as described in Attachment 2 of Reference 1.

Major activities completed during this reporting period:

- Additional portable equipment was ordered prior to the issuance of Reference 2, as described in an NEI letter to the NRC (Reference 3).
- A site-specific evaluation is in progress to establish the coping capabilities as defined in NEI 12-06 (Reference 4).
- Resources have been identified and project plans initiated, including development of milestones, to assure compliance with Reference 1.

Planned activities for the next six months:

- Development and submittal of the overall integrated plan.
- Define strategy and develop conceptual design.

Technical difficulties encountered that could affect the ability to provide the licensee's February 28, 2013, submittal:

None at this time.

Project milestones schedule through completion of installation and testing:

- A project milestones schedule will be provided with the overall integrated plan.
- Implementation of the order will be completed for Vogtle Electric Generating Plant (VEGP) Unit 1 prior to startup from Refueling Outage (RFO) 1R19 (Fall 2015).
- Implementation of the order will be completed for VEGP Unit 2 prior to startup from Refueling Outage (RFO) 2R17 (Fall 2014).

This letter contains no new regulatory commitments. If you have any questions, please contact Ken McElroy at (205) 992-7369.

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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.

Sworn to and subscribed before me this 23rd day of October, 2012.

Money Louise Henderson Notary Public

My commission expires: March 23, 2014

Respectfully submitted,

B. L. Ivey

Vice President - Regulatory Affairs

BLI/CLN

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. B. J. Adams, Vice President - Fleet Operations

Mr. M. J. Ajluni, Nuclear Licensing Director

RType: CVC7000

U. S. Nuclear Regulatory Commission

Mr. V. M. McCree, Regional Administrator

Mr. R. E. Martin, NRR Senior Project Manager - Fleet

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

Ms. Jessica A. Kratchman, NRR/JLD/PMB, NRC

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

State of Georgia

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