
Vogtle 3 and 4 Emergency Plan Update

NRC Licensing Action Planning
Meeting
August 28, 2013

Agenda

- Meeting objectives
- VEGP 3 and 4 Emergency Plan history
- SNC treatment of 2011 enhancements to emergency preparedness regulations
- Licensing actions required for activities previously completed for VEGP 1 and 2
- Scope of VEGP 3 and 4 Emergency Plan updates
- Application of 10 CFR 50.54(q)
- Future changes to VEGP 3 and 4 Emergency Plan
- Implementation uncertainties
- Questions and feedback

Meeting Objectives

- Describe SNC's plans for compliance consistent with 10 CFR 50, Appendix E.1.5
- Describe SNC's plans for other changes to the VEGP 3 and 4 Emergency Plan
- Seek NRC's feedback on the above plans

VEGP 3 and 4 Emergency Plan History

- Complete and integrated Emergency Plan (EP) submitted with Early Site Permit (ESP) Application including EP ITAAC – August 2006
- EP approved with ESP subject to seven permit conditions - August 2009
- Permit conditions resolved through Combined License (COL) with one license condition (EALs) – February 2012
- EP based on Vogtle 1 and 2 EP

SNC Treatment of 2011 Enhancements to Emergency Preparedness Regulations

- 10 CFR 50, Appendix E.I.5
 - COL holders may defer compliance with any change to emergency preparedness rules until 12/31/2013
- SNC chose to defer compliance
 - Must request to amend the license by 12/31/2013
 - Notwithstanding 10 CFR 52.103(g), licensee may not operate the plant until the NRC has approved the license amendment demonstrating compliance

Licensing Actions Required for Activities Previously Completed for VEGP 1 and 2

- Evacuation Time Estimate (ETE) submittal (E.IV.4)
 - VEGP 1 and 2 letter submitted
 - Plan to duplicate letter for VEGP 3 and 4 license, but not submit ETE again for review
- Alerting and Notification System (ANS) back-up (E.IV.D.4)
 - VEGP 1 and 2 compliant received letter from FEMA Region 4, December 2012
 - Obtain letter from FEMA Region 4
- EOF not subject to E.IV.E.8.b
 - Provisions of E.IV.E.8.e apply

Scope of Emergency Plan Updates

- Revise EP as necessary to comply with revised emergency preparedness rules
 - 10 CFR 50.47
 - 10 CFR 50, Appendix E
- Revise EP as necessary to reflect current state of Vogtle Site emergency preparedness
 - EP based on VEGP 1 and 2 EP Rev 43
 - VEGP 1 and 2 EP currently at Rev 60

Application of 10 CFR 50.54(q)

- May apply 10 CFR 50.54(q) to EP changes
- Changes to conform with revised emergency preparedness regulations may not be considered a reduction in effectiveness
- Potential license amendment
 - License Condition for staffing analysis (Appendix E.IV.A.9)
- Changes submitted to NRC in accordance with 10 CFR 50.54(q)(4) or (5) and 10 CFR 50.4

Future Changes to VEGP 3 and 4 Emergency Plan

- Location of Operational Support Center (OSC)
 - Common OSC to be located in maintenance support building
- Update ITAAC
 - Acceptance criteria reference to RG 1.101
 - Level of detail in Exercise objectives and supporting criteria
 - Table V2 H-1

Implementation Uncertainties

- Personnel qualification requirements for participation in graded exercise
 - SRO license
 - RO license
 - ANSI/ANS-3.1 experience requirements
- Integration of VEGP 1 and 2 graded exercise requirements with VEGP 3 and 4 graded exercise requirements
- EP related Performance Indicators

Questions and Feedback

- Questions?
- Feedback?