VogtlecolRAIsPEm Resource

From: Jaffe, David
Sent: Tuesday, March 11, 2014 10:30 AM
To: VogtlecolRAIsPEm Resource
Subject: VOG-LAR-13007-RAI-LTR-001.doc
Attachments: VOG-LAR-13007-RAI-LTR-001.doc

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From: Jaffe, David

Created By: David.Jaffe@nrc.gov

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March 11, 2014

Mr. B. L. Ivey, Vice President
Regulatory Affairs
Southern Nuclear Operating Company, Inc.
40 Inverness Center Parkway, B022
Birmingham, AL 35242

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 01 RELATED TO LICENSE AMENDMENT REQUEST (LAR) 13-030, REVISION TO VOGTLE 3 AND 4 EMERGENCY PLAN TO COMPLY WITH EMERGENCY PREPAREDNESS RULES, FOR THE VOGTLE ELECTRIC GENERATING PLANT UNITS 3 AND 4 COMBINED LICENSES

Dear Mr. Ivey:

In accordance with the provisions of 10 CFR 50.90, by letter dated December 20, 2013, Southern Nuclear Operating Company (SNC) submitted a license amendment request (LAR) 13-030, Revision to Vogtle 3 and 4 Emergency Plan to Comply with Emergency Preparedness Rules, to the U. S. Nuclear Regulatory Commission (NRC) for its Vogtle Electric Generating Plant (VEGP) Units 3 and 4 Combine licenses (Licenses Nos.NPF-91 and NPF-92, respectively). The NRC staff is performing a detailed review of this LAR to enable the staff to reach a conclusion on the safety of the proposed LAR.

The NRC staff has identified that additional information is needed to continue portions of the review. The staff's request for additional information (RAI) is contained in the enclosure to this letter.

To support the review schedule, you are requested to respond within 30 days of the date of this letter. If changes are needed to the final safety analysis report, the staff requests that the RAI response include the proposed wording changes.

If you have any questions or comments concerning this matter, you may contact me at 301-415-1439 or david.jaffe@nrc.gov.

Sincerely,

/RA/

David H. Jaffe, Senior Project Manager
Licensing Branch 4
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-025
52-026
eRAI Tracking No. 7441

Enclosure:
Request for Additional Information

CC: see next page

If you have any questions or comments concerning this matter, you may contact me at 301-415-1439 or david.jaffe@nrc.gov.

Sincerely,

/RA/

David H. Jaffe, Senior Project Manager
Licensing Branch 4
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-025
52-026
eRAI Tracking No. 7441

Enclosure:
Request for Additional Information

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DATE	03/11/2014	03/11/2014	03/11/2014

*Approval captured electronically in the electronic RAI system.

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Request for Additional Information 01
Application Title: Vogtle Electric Generating Plant (VEGP), Units 3 and 4 – LAR 13-030
Southern Nuclear Operating Co. (SNC)
Dockets 52-0025 and 52-0026
Review Section: 13.03 - Emergency Planning
Application Section: LAR-13-030

QUESTIONS

1. Section IV.E, "Emergency Facilities and Equipment," of Appendix E to 10 CFR Part 50 states in part that adequate provisions shall be made and described for emergency facilities and equipment, including: 8.d, which states that for nuclear power reactor licensees, an alternative facility (or facilities) that would be accessible even if the site is under threat of or experiencing hostile action, to function as a staging area for augmentation of emergency response staff and collectively having the following characteristics: the capability for communication with the emergency operations facility, control room, and plant security; the capability to perform offsite notifications; and the capability for engineering assessment activities, including damage control team planning and preparation, for use when onsite emergency facilities cannot be safely accessed during hostile action. . . . [implementation schedule provided].

   On LAR 13-030 Enclosure 1, page 4 of 5, the second paragraph under Topic 9 states: "The license amendment request provided in Enclosure 2 of this letter proposes a change to the VEGP 3 and 4 Emergency Plan which describes facility capabilities and locations where ERO augmentation personnel can assemble and commence mitigation activities while the site is not accessible" (emphasis added). On Enclosure 4, page 3 of 8, the proposed changes (mark-ups) to Section B.2 of the Emergency Plan state in part that, "Alternative facilities have been identified to ensure rapid access to the site by augmented staff" (emphasis added). Section B.2 does not identify the specific alternative facilities, including their locations, or address what their capabilities are to satisfy the requirements in Appendix E, Section IV.E.8.d. For example, do the alternative facilities ensure rapid access to the site because of location? What are the characteristics of the facilities, and how do they satisfy the criteria in Section IV.E.8.d relating to communications, offsite notifications, and engineering assessment activities? Please clarify and describe the alternative facilities, and revise the proposed changes to the VEGP Units 3 and 4 Emergency Plan, if appropriate. If no revisions are needed, explain why.

2. For LAR-13-030, Topic 2, entitled "Evacuation Time Estimate Updating," SNC proposes changes to the VEGP Units 3 and 4 Emergency Plan Section J.2.3, "Evacuation and Sheltering," and Appendix 6, "Evacuation Time Estimates for the Vogtle Electric Generating Plant Plume Exposure Pathway Emergency Planning Zone," and removal of Table J-4, "Evacuation Time Estimates," to address the new emergency preparedness requirements in Section IV.4, IV.5, and IV.6 of Appendix E to 10 CFR Part 50.

   In LAR-13-030 Enclosure 1, page 2 of 5, the first sentence under Topic 2 references various SNC letters, which address an ETE Update for VEGP Units 1 and 2. SNC's referenced November 26, 2013, letter (NL-13-2340) includes a revised ETE Update for

VEGP Units 1 and 2 (in Enclosure 3), which is also applicable to VEGP Units 3 and 4. The staff reviewed the revised ETE Update for VEGP Units 1 and 2 against the proposed revision in LAR-13-030 Enclosure 4, Appendix 6, and have the following questions.

a. LAR-13-030 Appendix 6 states that the total year 2012 permanent resident population within the 10-mile emergency planning zone (EPZ) for VEGP is estimated to be 3,080. In contrast, Table 4, "2012 Permanent Resident Population Distributions by Sector and Ring," indicates that the Cumulative Population for Population Mile 9-10 is 3,248. In addition, Appendix 6 states that the total peak transient population within the 10-mile EPZ is estimated to be 2,915. In contrast, Table 6, "2012 Transient Population Distributions by Sector and Ring," indicates that the Cumulative Population for Population Miles 9-10 is 2,907. Please clarify the inconsistencies, and correct the proposed description in Appendix 6, if appropriate, or explain why such a revision(s) is not appropriate.

b. LAR-13-030 Appendix 6 lists five bullets that identify the five categories of population that are identified in the report (i.e., in the revised ETE Update). The paragraph after the bullets addresses estimated population numbers for the five categories, except for the fourth bullet, entitled "Special facility residents." Section 3.4, "Special Facility and School Populations," of the revised ETE Update states, in part, that no special facilities, as defined in NUREG/CR-7002, were found within the EPZ. In order to address what appears to be missing information in Appendix 6 related to the fourth bullet listing of 'Special facility residents,' please revise Appendix 6 to clarify that there are no special facility residents within the 10-mile EPZ for VEGP, if appropriate, or explain why such a revision is not appropriate.