



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION II
245 PEACHTREE CENTER AVENUE NE, SUITE 1200
ATLANTA, GEORGIA 30303-1257

August 27, 2014

Mr. Dennis Madison
Vice President - Vogtle
Southern Nuclear Operating Company, Inc.
Vogtle Electric Generating Plant
7821 River Road
Waynesboro, GA 30830

SUBJECT: NOTICE OF ENFORCEMENT DISCRETION (NOED) FOR VOGTLE ELECTRIC GENERATING PLANT UNIT 2, TECHNICAL SPECIFICATION 3.6, "CONTAINMENT SYSTEMS," SPECIFIC TO 2B CONTAINMENT SPRAY PUMP [NOED NO. 14-2-03]

Dear Mr. Madison:

By letter dated August 25, 2014, you requested that the NRC exercise discretion to not enforce compliance with the actions required in Vogtle Electric Generating Plant Unit 2, Technical Specification (TS) 3.6, "Containment Systems." Specifically, your request for enforcement discretion was associated with repairs to the "2B" containment spray pump and applied to TS Limiting Condition for Operation (LCO) 3.6.6, which requires two containment spray trains and two containment cooling trains to be operable for Modes 1, 2, 3, and 4. Technical Specification LCO 3.6.6, Condition A, requires the restoration of an inoperable containment spray system to operable status within 72 hours. Your letter documented information discussed previously with the NRC staff in a telephone conference on August 21, 2014, at 6:00 p.m., (all times refer to Eastern Daylight Time). The principal NRC and Southern Company staff members who participated in the telephone conference are listed in the Enclosure. The NRC staff determined that the information in your letter requesting the NOED was consistent with your oral request.

You stated that the "2B" containment spray pump was removed from service at 2:00 a.m., on August 19, 2014, to perform routine preventive maintenance and testing activities. Removal of the "2B" containment spray pump from service placed Vogtle Electric Generating Plant Unit 2 in TS LCO 3.6.6, Condition A, which requires restoration of an inoperable containment spray system to operable status within 72 hours. On August 20, 2014, at 3:14 a.m., during the post maintenance testing, your staff noted that the pump inboard seal was overheating and damaged. The identification of the pump inboard seal damage occurred 25 hours into the 72 hours TS required action completion time, which would expire at 2:00 a.m., on August 22, 2014. During the morning of August 20, 2014, you informed the resident inspectors verbally that you would potentially request a NOED. During a telephone conference on August 21, 2014, at 6:00 p.m., you officially requested an extension of the 72 hours allowed outage time by an additional 60 hours for a total of 132 hours. The requested extension was necessary to perform the repairs required to restore the "2B" containment spray pump to operable status. You requested

that a NOED be granted pursuant to the NRC's policy regarding the exercise of discretion for an operating facility, set out in Section 3.8 of the Enforcement Policy, and that the NOED be effective until 2:00 p.m., on August 24, 2014. This letter documents our telephone conversation that began at 6:00 p.m., on August 21, 2014, in which we orally granted this NOED request.

The NRC staff determined that the requested NOED was appropriate to avoid an unnecessary plant transient that would result from compliance with TS 3.6.6, and which, if avoided would minimize potential safety consequences and operational risks (Inspection Manual Chapter 0410, Section 03.03, Criterion a). The NRC staff's basis for this discretion considered your compensatory actions including:

- Both trains of the emergency core cooling system, both trains of the containment cooling system, the remaining train of the containment spray system, and attendant equipment will be protected during the duration of the enforcement discretion period;
- Work schedules were reviewed and some work was rescheduled to ensure plant vulnerabilities are reduced;
- Switchyard work will be stopped during the enforcement discretion period; and
- If the remaining train of containment spray becomes inoperable or requires maintenance during the proposed 60 hours extended completion time, TS 3.0.3 will be entered.

The basis for this discretion also considered that:

- Your calculated Incremental Conditional Core Damage Probability and Incremental Conditional Large Early Release Probability values did not exceed the threshold guidance provided in Inspection Manual Chapter 0410 and were consistent with values calculated by NRC regional analysts;
- The cause and proposed plan to resolve the situation were understood such that there was a high likelihood that planned actions to resolve the situation could be completed within the proposed NOED time frame;
- The noncompliance would not be of potential detriment to the public health and safety; and
- Independent verification of some of these conditions and actions will be performed by our inspection staff.

On the basis of the NRC staff's evaluation of your request, we have concluded that granting this NOED is consistent with the Enforcement Policy and NRC staff guidance and has no adverse impact on public health and safety or the environment. Therefore, as we informed you at 7:05 p.m., on August 21, 2014, we exercised discretion to not enforce compliance with Vogtle Electric Generating Plant Unit 2 TS LCO 3.6.6 for the period from August 22, 2014, at 2:00 a.m., until August 24, 2014, at 2:00 p.m. As stated during the conference call and in your letter, you have determined that a follow up license amendment is not necessary. The NRC staff agrees with this determination.

D. Madison

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We understand that the condition causing the need for this NOED was corrected, allowing Vogtle Electric Generating Plant Unit 2 to exit from TS LCO 3.6.6 Condition A and from this NOED at 1:59 a.m., on August 24, 2014.

Sincerely,

/RA/

Victor M. McCree
Regional Administrator

Docket No.: 50-425
License No.: NPF-81

Enclosure: List of Participants

cc distribution via ListServ

D. Madison

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We understand that the condition causing the need for this NOED was corrected, allowing Vogtle Electric Generating Plant Unit 2 to exit from TS LCO 3.6.6 Condition A and from this NOED at 1:59 a.m., on August 24, 2014.

Sincerely,

/RA/

Victor M. McCree
Regional Administrator

Docket No.: 50-425
License No.: NPF-81

Enclosure: List of Participants

cc distribution via ListServ

X PUBLICLY AVAILABLE NON-PUBLICLY AVAILABLE SENSITIVE X NON-SENSITIVE
ADAMS: X Yes ACCESSION NUMBER: ML X SUNSI REVIEW COMPLETE FORM 665 ATTACHED

OFFICE	RII:DRP	RII:DRP	RII:DRP	RII:DRA	HQ: NRR	HQ: NRR	RII: RA
SIGNATURE	JGW /RA/	MEF /RA/	JTM /RA/	LDW /RA/	Via email	Via telecom	VMM /RA/
NAME	JWorosilo	MFranke	JMunday	LWert	MMarkley	BMartin	VMcCree
DATE	08/26/2014	08/26/2014	08/26/2014	08/27/2014	08/27/2014	08/27/2014	08/27/2014
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

OFFICIAL RECORD COPY DOCUMENT NAME:

D. Madison

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Letter to Dennis Madison from Victor M. McCree dated August 27, 2014

SUBJECT: NOTICE OF ENFORCEMENT DISCRETION (NOED) FOR VOGTLE ELECTRIC
GENERATING PLANT UNIT 2, TECHNICAL SPECIFICATION 3.6,
"CONTAINMENT SYSTEMS," SPECIFIC TO 2B CONTAINMENT SPRAY PUMP
[NOED NO. 14-2-03]

DISTRIBUTION:

D. Gamberoni, RII

L. Douglas, RII

OE Mail

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List of Participants

NRC REGION II ATTENDEES

V. McCree, Regional Administrator
M. King, Acting Director, Division of Reactor Projects
F. Ehrhardt, Chief, Reactor Projects Branch 2, Division of Reactor Projects
M. Franke, Chief, Division of Reactor Projects
M. Cain, Vogtle Senior Resident Inspector, Division of Reactor Projects
G. MacDonald, Senior Reactor Analyst, Division of Reactor Projects

NRC HQ ATTENDEES

M. Markley, Acting Deputy Director, Division of Operating Reactor Licensing, NRR
B. Pascarelli, Chief, Division of Operating Reactor Licensing, NRR
B. Martin, Senior Project Manager, Division of Operating Reactor Licensing, NRR
R. Dennig, Chief, Containment and Ventilation Branch, DSS
D. Alley, Component Performance NDE and Testing Branch, DE
R. Wolfgang, Technical Reviewer, Component Performance NDE and Testing Branch, DE
J. Circle, Team Leader, PRA Operations Branch, DRA
C. Fong, Technical Reviewer, PRA Operations Branch, DRA
B. Benney, NOED Process Owner, NRR
E. Miller, Project Manager, Division of Operating Reactor Licensing, NRR

LICENSEE ATTENDEES

G. Saxon, Vogtle Plant Manager
A. Coker, Risk Informed Engineer
F. Pournia, Engineering Director
G. Gunn, Regulatory Affairs Manager - Acting
K. Glandon, SNC Systems Engineer
T. Huynh, Vogtle Systems Engineer
M. Norris, Assistant Maintenance Manager
J. Klecha, Operations Director
D. Myers, Maintenance Manager
M. Griffin, Outage Manager
C. Mullins, Vogtle Maintenance Supervisor
D. Madison, Vogtle Site Vice President
P. Ivey, Regulatory Affairs Vice President
G. Saxon, Vogtle 1 & 2 Plant Manager
C. Pierce, Regulatory Affairs Director
D. McKinney, Licensing Manager
A. Afzali, Risk Informed Engineering Director
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