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Docket No.: 50-424  
50-425

NL-15-0241

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

**Vogtle Electric Generating Plant – Units 1 and 2  
Fourth Six-Month Status Report of the Implementation of the  
Requirements of the Commission Order with Regard to  
Reliable Spent Fuel Pool Instrumentation (EA-12-051)**

References:

1. NRC Order Number EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, dated March 12, 2012.
2. NRC Interim Staff Guidance JLD-ISG-2012-03, Compliance with Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, Revision 0, dated August 29, 2012.
3. NEI 12-02, Industry Guidance for Compliance with NRC Order EA-12-051, To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, Revision 1, dated August 2012.
4. Vogtle Electric Generating Plant – Units 1 and 2 Initial Status Report in Response to Commission Order with Regard to Reliable Spent Fuel Pool Instrumentation (EA-12-051), dated October 23, 2012.
5. Vogtle Electric Generating Plant – Units 1 and 2 Overall Integrated Plan in Response to Commission Order with Regard to Reliable Spent Fuel Pool Instrumentation (EA-12-051), dated February 27, 2013.

Ladies and Gentlemen:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an order (Reference 1) to Southern Nuclear Operating Company. Reference 1 was immediately effective and directs the Vogtle Electric Generating Plant – Units 1 and 2 (VEGP) to install reliable spent fuel pool instrumentation. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C.1.a of Reference 1. Reference 2 endorses industry guidance document NEI 12-02, Revision 1 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the VEGP initial status report regarding spent fuel pool instrumentation strategies. Reference 5 provided the VEGP overall integrated plan.

Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 3 provides direction regarding the content of the status reports. The purpose of this letter is to provide the fourth six-month status report pursuant to Section IV, Condition C.2, of Reference 1, delineating progress made in implementing the requirements of Reference 1. The enclosed report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no new NRC commitments. If you have any questions, please contact John Giddens at 205.992.7924.

Mr. C. R. Pierce states he is the Regulatory Affairs Director for 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.

Respectfully submitted,



C. R. Pierce  
Regulatory Affairs Director

CRP/JMG/GLS

Sworn to and subscribed before me this 26 day of February, 2015.



Laura L. Crompton  
Notary Public

My commission expires: 10-8-2017

Enclosure: Vogtle Electric Generating Plant - Units 1 and 2 Fourth Six-Month Status Report Regarding Reliable Spent Fuel Pool Instrumentation (EA-12-051)

cc: Southern Nuclear Operating Company

Mr. S. E. Kuczynski, Chairman, President & CEO  
Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer  
Mr. B. K. Taber, Vice President – Vogtle 1 & 2  
Mr. M. D. Meier, Vice President – Regulatory Affairs  
Mr. D. R. Madison, Vice President – Fleet Operations  
Mr. B. J. Adams, Vice President – Engineering  
Mr. G. W. Gunn, Regulatory Affairs Manager – Vogtle 1 & 2  
RType: CVC7000

U. S. Nuclear Regulatory Commission

Mr. W. M. Dean, Director of the Office of Nuclear Reactor Regulations  
Mr. V. M. McCree, Regional Administrator  
Mr. R. E. Martin, NRR Senior Project Manager – Vogtle 1 & 2  
Mr. L. M. Cain, Senior Resident Inspector – Vogtle 1 & 2  
Mr. B. A. Purnell, NRR/JLD/PMB  
Mr. S. R. Jones, NRR/DSS/SBPB

State of Georgia

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

**Vogtle Electric Generating Plant – Units 1 and 2  
Fourth Six-Month Status Report of the Implementation of the  
Requirements of the Commission Order with Regard to  
Reliable Spent Fuel Pool Instrumentation (EA-12-051)**

**Enclosure**

**Vogtle Electric Generating Plant – Units 1 and 2  
Fourth Six-Month Status Report Regarding  
Reliable Spent Fuel Pool Instrumentation (EA-12-051)**

**Vogtle Electric Generating Plant – Units 1 and 2  
 Fourth Six-Month Status Report Regarding  
Reliable Spent Fuel Pool Instrumentation (EA-12-051)**

**1 Introduction**

Vogtle Electric Generating Plant Units 1 and 2 developed an Overall Integrated Plan (Reference 1 of this enclosure), documenting the requirements to install reliable spent fuel pool (SFP) instrumentation, in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the last status report, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

**2 Milestone Accomplishments**

In addition to the submittal of status reports, the following milestone(s) directly related to SFP instrumentation implementation have been completed since the previous 6-month update, and are current as of December 31, 2014:

- Develop Modifications Unit 1
- Receipt of Unit 1 SFP Instrument Channel
- Complete Functional Test of Unit 2 SFP Instruments
- Unit 2 Implementation Complete (2nd RFO)

**3 Milestone Schedule Status**

The table on the following page provides an update to the milestone schedule to support the Overall Integrated Plan. This section provides the activity status of each item, and the expected completion date noting any change. The dates are planning dates subject to change as design and implementation details are developed.

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Submit 60 Day Status Report	Oct 2012	Complete	N/A
Submit Overall Integrated Plan	Feb 2013	Complete	N/A
Unit 2 1st RFO	Apr 2013	Complete	N/A
June 18, 2013 RAls submittal due	Jul 18, 2013	Complete	N/A
Submit 6 Month Status Report	Aug 2013	Complete	N/A
Develop Modifications Unit 2	May 2014	Complete	N/A
Submit 6 Month Status Report	Feb 2014	Complete	N/A
Unit 1 1st RFO	Apr 2014	Complete	N/A
Receipt of Unit 2 SFP Instrument Channel	Jun 2014	Complete	N/A
Develop Modifications Unit 1	Dec 2014	Complete	N/A
Complete Functional Test of Unit 2 SFP Instruments	3Q 2014	Complete	N/A
Submit 6 Month Status Report	Aug 2014	Complete	N/A
Unit 2 Implementation Complete (2nd RFO)*	Oct 2014	Complete	N/A
Receipt of Unit 1 SFP Instrument Channel	Dec 2014	Complete	N/A
Submit 6 Month Status Report	Feb 2015	Complete	N/A
Submit 6 Month Status Report	Aug 2015	Not Started	

Enclosure to NL-15-0241  
 Fourth Six-Month Status Report of SFPI OIP Implementation

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Complete Functional Test of Unit 1 SFP Instruments	3Q 2015	Not Started	
Unit 1 Implementation Complete (2nd RFO)*	Oct 2015	Not Started	
Submit Completion Report	Dec 2015	Not Started	

\*Full compliance after second listed refueling outage

#### 4 Changes to Compliance Method

There are no changes to the compliance method as documented in the Overall Integrated Plan (Reference 1 of this enclosure).

#### 5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

Vogtle Electric Generating Plant Unit 1 expects to comply with the order implementation date and no relief/relaxation is required at this time. Vogtle Electric Generating Plant Unit 2 has completed implementation of the order as described in Reference 4.

#### 6 Open Items from Interim Staff Evaluation

As discussed with the NRC staff, the Interim Staff Evaluation (ISE) Open Items for SFP Instrumentation are the only remaining issues. The NRC provided thirteen (13) requests for additional information (RAIs) by letter on November 4, 2013. These RAIs have been addressed by separate SNC E-Portal postings on March 25, 2014 and June 29, 2014.

#### 7 Potential Interim Staff Evaluation Impacts

There are no potential impacts to the Interim Staff Evaluation identified at this time except for those identified in Section 6.

#### 8 References

The following references support the updates to the Overall Integrated Plan described in this attachment:

1. Vogtle Electric Generating Plant Units 1 and 2 Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)," dated February 27, 2013.
2. NRC Order Number EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, dated March 12, 2012.
3. Interim Staff Evaluation and Request for Additional Information – Vogtle Electric Generating Plant, Units 1 and 2 (VEGP) Regarding Overall Integrated Plan (OIP) for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051) (TAC NOS. MF0723 and MF0724), dated November 4, 2013.
4. Vogtle Electric Generating Plant Unit 2 Completion of Required Action by NRC Order EA-12-051, Reliable Spent Fuel Pool Level Instrumentation, dated December 1, 2014.

## **9 Other Additional Information**

The following information provides clarity or corrections to the Overall Integrated Plan but do not constitute a change in strategy:

- Although not explicitly stated in the response to RAI 3 posted on the Portal on June 29, 2014, neither Vogtle Electric Generating Plant will be using a stilling well.