

# Southern Nuclear Operating Company (SNC) Standard Emergency Plan (SEP)

**SNC/Nuclear Regulatory Commission (NRC) Pre-submittal Interaction**  
*April, 22, 2015*



# Agenda

- July 2014 Interaction Recap
- Change in Submittal Scope
- Status of Fleet SEP
- Construction/Testing Schedule Milestones Update
- License Amendment Scope and Schedule
- Key Features of the Submittal
- Effect on EP Inspection Tests Analyses and Acceptance Criteria (ITAAC)
- Licensing Considerations
- Questions/Feedback

# July 2014 Interaction Recap

- Described current status of and history of Vogtle 3-4 emergency plan
- Discussed options for combining the two Vogtle emergency plans into a single plan
- Agreed that the option of adopting the fleet SEP on a limited basis to include Vogtle only was the option of choice
- Agreed that future interactions would be desirable

# Change in Submittal Scope

- Initial submittal to include SNC SEP base for all SNC plants, and annexes for Farley, Hatch, Vogtle 1-2 and Vogtle 3-4
- Vogtle 1-2 annex will be submitted using the current Technical Support Center (TSC) and Operations Support Center (OSC)
- Vogtle 3-4 will be submitted using the Vogtle common TSC and OSC
- When approved and SNC personnel trained on new SNC Fleet SEP then Farley, Hatch, Vogtle 1-2 and Vogtle 3-4 will implement
- Impacts to Emergency Operations Facility (EOF) and EOF staffing require all SNC plants to implement concurrently, with exception of Vogtle 3-4
- A separate License Amendment Request (LAR) will be submitted for Vogtle 1-2 to transition to the common TSC and OSC
- The LAR for use of the common Vogtle TSC and OSC by all Vogtle units will be implemented prior to 10 CFR 52.103(g)

# Status of Fleet SEP

- Fleet SEP drafted
  - Includes all emergency plan information common to SNC plants (Farley, Hatch and Vogtle)
    - EOF
    - Communication plan
- Annexes for Farley, Hatch, Vogtle 1-2 and Vogtle 3-4 drafted
  - Include EP information unique to each site
  - Much information for each Vogtle annex identical, but separate information for treatment of Emergency Action Level (EALs) and associated technical bases

# VEGP 3 and 4 EP Related Construction/Testing Schedule Milestones

- VEGP 3 fuel load
- VEGP 10 CFR 52.103(g) finding – EP required to be followed and effectiveness maintained (10 CFR 50.54(q)(2))
- VEGP 3 exercise – completion of EP ITAAC
- VEGP TSC and OSC available for training/drills
- Final EALs submitted for approval – 180 days before fuel load – License Condition (Following SCANA approach)
- Staffing assessment submitted – 180 days before fuel load – License Condition (Staffing analysis completed December 2014)
- Implementing procedures submitted – 180 days before fuel load – ITAAC

# License Amendment Scope and Schedule

- Amend all eight licenses to incorporate a SNC SEP with site specific annexes
- Applies the common TSC and OSC to Vogtle 3-4
- Includes conforming changes to affected EP ITAAC
- Submittal planned for June 2015
- Requesting approval by June 2016
- Submit LAR for Vogtle site common TSC and OSC in June 2016 immediately following approval of SNC SEP
- Implement SNC SEP for entire SNC Fleet (except Vogtle 3-4) in June 2017
- Implement Common TSC and OSC for Vogtle site at or near the 103(g) for Unit 3

# Key Features of the Submittal

- Conforms to NUREG 0654 Rev. 1
- Removes unnecessary detail
- Leverages fleet standard procedures and processes
- Requests a 90 minute augmentation time
- Revises EOF organization to include Emergency Director
- Standardizes on-shift and augmented ERO for the SNC fleet with minor exceptions for Vogtle 3-4



# Effect on EP ITAAC

- Some conforming changes to EP ITAAC required
  - 90 minute augmentation time
  - Use of tone alert radio as back-up notification method
- SEP refers to implementing procedures as Emergency Plan Implementing Procedure (EIPs)
- Existing emergency plan uses the term Emergency Implementing Procedure (EIP)
- EP ITAAC will retain the EIP nomenclature

# Licensing Considerations

## Submittal contents

- LAR Considerations
  - One letter with separate enclosures for Farley, Hatch, Vogtle 1-2 and Vogtle 3-4
  - Separate enclosures with change justification matrices for Farley, Hatch, Vogtle 1-2 and Vogtle 3-4
  - Separate enclosures with ERO Augmentation Technical Document for Farley, Hatch, Vogtle 1-2 and Vogtle 3-4
- Separate LAR for Vogtle site common TSC and OSC submitted after NRC approval of SNC SEP

# Questions/Feedback

