



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 4, 2015

Mr. C. R. Pierce
Regulatory Affairs Director
Southern Nuclear Operating Co., Inc.
P.O. Box 1295 / BIN B038
Birmingham, AL 35201-1295

SUBJECT: EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2 – INTERIM STAFF
RESPONSE TO REEVALUATED FLOOD HAZARDS SUBMITTED IN
RESPONSE TO 10 CFR 50.54(f) INFORMATION REQUEST – FLOOD-
CAUSING MECHANISM REEVALUATION (TAC NOS. MF3868 AND MF3869)

Dear Mr. Pierce:

The purpose of this letter is to provide a summary of the U.S. Nuclear Regulatory Commission (NRC) staff's assessment of the re-evaluated flood-causing mechanisms described in the March 6, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14069A054), flood hazard reevaluation report (FHRR) submitted by Southern Nuclear Operating Company, Inc. (the licensee) for Edwin I. Hatch Nuclear Plant, Units 1 and 2 (Hatch), as well as supplemental information resulting from requests for additional information and audits.

By letter dated March 12, 2012 (ADAMS Accession No. ML12053A340), the NRC issued a request for information pursuant to Title 10 of the *Code of Federal Regulations*, Section 50.54(f) (hereafter referred to as the 50.54(f) letter). The request was issued as part of implementing lessons learned from the accident at the Fukushima Dai-ichi nuclear power plant. Enclosure 2 to the 50.54(f) letter requested licensees to re-evaluate flood-causing mechanisms using present-day methodologies and guidance. Concurrently, with the reevaluation of flooding hazards, licensees were required to develop and implement mitigating strategies in accordance with NRC Order EA-12-049, "Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" (ADAMS Accession No. ML12054A735). On March 30, 2015, the Commission provided Staff Requirements Memoranda (SRM) (ADAMS Accession No. ML15089A236) to COM-SECY-14-0037, "Integration of Mitigating Strategies for Beyond-Design-Basis External Events and the Reevaluation of Flooding Hazards," dated November 21, 2014 (ADAMS Accession No. ML14309A256), affirming that licensees need to address the reevaluated flooding hazards within their mitigating strategies for beyond-design-basis external events.

Enclosure two transmitted herewith contains Security-Related Information. When separated from the Enclosure, this document is decontrolled.

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The NRC staff has reviewed the information submitted by the licensee and has summarized the results of the review in the tables provided as Enclosure 1 to this letter. Table 1 provides the current design-basis flood hazard mechanisms. Table 2 provides reevaluated flood hazard mechanisms; however, reevaluated hazard mechanisms bounded by the current design-basis (Table 1) are not included. Because Table 2 includes security-related information, Enclosure 1 contains the redacted version of Table 2. Enclosure 2 is withheld from public disclosure and restores the security-related information to Table 2.

The NRC staff has concluded that the licensee's reevaluated flood hazards information, as summarized in Enclosure 1, is suitable for the assessment of mitigating strategies, developed in response to Order EA-12-049 (i.e. defines the mitigating strategies flood hazard information described in guidance documents currently being finalized by the industry and NRC staff) for Hatch. Further, the NRC staff has concluded that the licensee's reevaluated flood hazard information is a suitable input for other assessments associated with Near-Term Task Force Recommendation 2.1 "Flooding." The NRC staff plans to issue a staff assessment documenting the basis for these conclusions at a later time.

In addition, the Nuclear Energy Institute (NEI) guidance document NEI 12-06 "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide" is currently being revised. This revision will include a methodology to perform a Mitigating Strategies Assessment (MSA) with respect to the reevaluated flood hazards. Once this methodology is endorsed by the NRC, flood event duration parameters and applicable flood associated effects should be considered as part of the Hatch MSA. The NRC staff will evaluate the flood event duration parameters (including warning time and period of inundation) and flood-related associated effects developed by the licensee during the NRC staff's review of the MSA.

As stated above, Table 2 of the enclosure to this letter describes the reevaluated flood hazards that exceed the current design-basis. In order to complete its response to the information requested by Enclosure 2 to the 50.54(f) letter, the licensee is expected to submit an integrated assessment or a focused evaluation, as appropriate, to address these reevaluated flood hazards, as described in NRC letter, "Coordination of Request for Information Regarding Flooding Hazard Reevaluation and Mitigating Strategies for Beyond-Design-Basis External Events" (ADAMS Accession No. ML15174A257). This letter describes the changes in the NRC's approach to the flood hazard reevaluations that were approved by the Commission in its SRM to COMSECY-15-0019, "Closure Plan for the Reevaluation of Flooding Hazards for Operating Nuclear Power Plants" (ADAMS Accession No. ML15209A682).

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If you have any questions, please contact me at (301) 415-6185 or e-mail
Anthony.Minarik@nrc.gov.

Sincerely,

Handwritten signature of Anthony Minarik in black ink.

Anthony Minarik, Project Manager
Hazards Management Branch
Japan Lessons-Learned Division
Office of Nuclear Reactor Regulation

Docket Nos. 50-321 and 50-366

Enclosures:

1. Summary of Results of Flooding
Hazard Re-Evaluation Report (Redacted Version)
2. Summary of Results of Flooding
Hazard Re-Evaluation Report (Non-Public Version)

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ENCLOSURE 1:

SUMMARY TABLES OF
REEVALUATED FLOOD HAZARD LEVELS

Table 1. Current Design Basis Flood Hazards for Use in the MSA

Mechanism	Stillwater Elevation	Waves/Runup	Design Basis Hazard Elevation	Reference
Local Intense Precipitation	Not included in DB	Not included in DB	Not included in DB	FHRR Section 4.b.1 and Table 13
Streams and Rivers Flooding of the Altamaha River at Plant Hatch	105.0 ft NGVD29	Not applicable	105.0 ft NGVD29	FHRR Section 4.b.2 and Table 13
Failure of Dams and Onsite Water Control/Storage Structures [Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
Storm Surge	No Impact on the Site Identified	No Impact on the Site Identified	No Impact on the Site Identified	FHRR Section 4.b.4 and Table 13
Seiche	No Impact on the Site Identified	No Impact on the Site Identified	No Impact on the Site Identified	FHRR Section 4.b.5 and Table 13
Tsunami	No Impact on the Site Identified	No Impact on the Site Identified	No Impact on the Site Identified	FHRR Section 4.b.6 and Table 13
Ice-Induced Flooding	No Impact on the Site Identified	No Impact on the Site Identified	No Impact on the Site Identified	FHRR Section 4.b.7 and Table 13

Table 1. Current Design Basis Flood Hazards for Use in the MSA

Mechanism	Stillwater Elevation	Waves/Runup	Design Basis Hazard Elevation	Reference
Channel Migrations/Diversions	No Impact on the Site Identified	No Impact on the Site Identified	No Impact on the Site Identified	FHRR Section 4.b.8 and Table 13

Note 1: Reported values are rounded to the nearest one-tenth of a foot.

Table 2. Reevaluated Flood Hazards for Flood-Causing Mechanisms for Use in the MSA

Mechanism	Stillwater Elevation	Waves/Runup	Reevaluated Hazard Elevation	Reference
Local Intense Precipitation				
Control Building 1-hr 1 sq. mi. PMP	131.2 ft NGVD29	Minimal	131.2 ft NGVD29	FHRR Table 3
Intake Structure 1-hr 1 sq. mi. PMP	111.2 ft NGVD29	Minimal	111.2 ft NGVD29	FHRR Table 3
Diesel Generator Building 1-hr 1 sq. mi. PMP	130.2 ft NGVD29	Minimal	130.2 ft NGVD29	FHRR Table 3
Turbine and Reactor Building (Unit 1 and 2) 1-hr 1 sq. mi. PMP	130.4 ft NGVD29	Minimal	130.4 ft NGVD29	FHRR Table 3
Streams and Rivers				
Flooding of the Altamaha River at Plant Hatch	109.6 NGVD29	Not applicable	109.6 NGVD29	FHRR Section 5.b and Table 13
Failure of Dams and Onsite Water Control/Storage Structures				
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]

Note 1: The licensee is expected to develop flood event duration parameters and applicable flood associated effects to conduct the MSA. The staff will evaluate the flood event duration parameters (including warning time and period of inundation) and flood associated effects during its review of the MSA.

Note 2: Reevaluated hazard mechanisms bounded by the current design basis (see Table 1) are not included in this table.

Note 3: Reported values are rounded to the nearest one-tenth of a foot.

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If you have any questions, please contact me at (301) 415-6185 or e-mail Anthony.Minarik@nrc.gov.

Sincerely,

/RA/

Anthony Minarik, Project Manager
Hazards Management Branch
Japan Lessons-Learned Division
Office of Nuclear Reactor Regulation

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ADAMS Accession Nos.: PKG ML15329A135; Letter ML15321A156; *via email

OFFICE	NRR/JLD/JHMB/PM	NRR/JLD/LA	NRO/DSEA/RHM2/TR*
NAME	AMinarik	SLent	PChaput
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OFFICE	NRO/DSEA/RHM2/BC*	NRR/JLD/JHMB/BC	NRR/JLD/JHMB/PM
NAME	ARivera-Varona	MShams	AMinarik
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