

## Vogle PEmails

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**From:** Hoellman, Jordan  
**Sent:** Wednesday, April 06, 2016 9:58 AM  
**To:** Vogtle PEmails  
**Subject:** 4/7/16 Public Meeting Questions related to Vogtle Exemption for JPMs

**From:** Kallan, Paul  
**Sent:** Wednesday, April 06, 2016 9:31 AM  
**To:** Hoellman, Jordan <Jordan.Hoellman2@nrc.gov>  
**Subject:** FW: Questions related to Vogtle Exemption for JPMs

Hi Jordan,

Please put this ADAMS Vogtle PEmails and send it to folks who will be on the call tomorrow.

Thank you,

Paul

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**From:** Kent, Lauren  
**Sent:** Wednesday, April 06, 2016 9:18 AM  
**To:** McKirgan, John <[John.McKirgan@nrc.gov](mailto:John.McKirgan@nrc.gov)>; Kallan, Paul <[Paul.Kallan@nrc.gov](mailto:Paul.Kallan@nrc.gov)>  
**Cc:** Junge, Michael <[Michael.Junge@nrc.gov](mailto:Michael.Junge@nrc.gov)>  
**Subject:** Questions related to Vogtle Exemption for JPMs

John and Paul,

Here are the questions for I wrote for the Vogtle exemption for JPMs that I plan to discuss with them tomorrow.

1. SNC's exemption states, "SNC requests NRC Examiners administer the plant walk-through portion of the operating test utilizing the same methods the NRC licensed SNC to use for cold licensing OJT. By employing these methods, NRC will ensure the equitable and consistent administration of the operating test because this exemption aligns the administration of the walk-through portion of the operating test with the cold license training program that was used to train operators."

**Staff comments:** (1) Can they actually support testing the in-plant tasks that have an importance rating of 2.5 or higher, as documented in their facility's task analysis, with one or more of these alternative methods? To demonstrate this, they should do an analysis. One way to do this would be to create a table that shows how all of the in-plant tasks with an importance rating of 2.5 or higher can be performed with alternate means. For example, if a task is to operate controls at the remote shutdown workstation, then the proposed alternative may be to use a mockup of the controls at that workstation and have the applicant discuss how he or she would perform the task. (2) Additionally, are there any important in-plant tasks that CANNOT be tested with alternate means? If so, why is it acceptable to not test these important tasks. (3) Do they, or will they, have procedures that can be used to administer these JPMs? If not, then won't some important tasks be excluded, and if so, what is that acceptable?

2. SNC's exemption states, "SNC also believes that this exemption would not impact the ability to maintain equitable and consistent testing under uniform conditions."

**Staff comments:** Why? What is the basis for their statement? Maintaining uniform conditions is the most important part of “authorized by law” in this instance.

3. SNC’s exemption states, “The exemption is necessary to have licensed operators available for plant startup and the testing required by 10 CFR 52.103(g).”

**Staff comment:** Can they elaborate more on why it is necessary to have licensed operators now, given the timeline they discuss in the exemption request? Is this exemption associated with any of the Principles of Good Regulation?

Sincerely,

Lauren Kent  
Reactor Operations Engineer  
NRO/DCIP/COLB  
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