



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

June 30, 2016

LICENSEE: Southern Nuclear Operating Company.
FACILITY: Edwin I. Hatch Nuclear Plant, Unit Nos. 1 and 2
SUBJECT: SUMMARY OF JUNE 21, 2016, PUBLIC MEETING WITH SOUTHERN NUCLEAR OPERATING COMPANY, INC. TO DISCUSS DELAY OF APPLICATION DATE FOR NFPA 805 LICENSE AMENDMENT REQUEST (CAC NOS. MF7736 AND MF7737)

On June 21, 2016, a Category 1 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of Southern Nuclear Operating Company, Inc. (SNC, the licensee) at NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville, Maryland. The purpose of the meeting was to discuss with the SNC staff its proposed delay in the application date for the license amendment request (LAR) to implement Title 10 of the *Code of Federal Regulations*, Section 50.48(c), "National Fire Protection Association Standard NFPA 805," "Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants," at the Edwin I. Hatch Nuclear Plant (HNP), Unit Nos. 1 and 2.

The meeting notice and agenda, dated June 3, 2016, are located at Agencywide Documents Access and Management System (ADAMS) Accession No. ML16172A039. The licensee provided two handouts for the meeting. Its presentation is available in ADAMS at Accession No. ML16174A027. The licensee also provided a draft copy of a proposed letter requesting an 18-month extension. This draft letter is available in ADAMS at Accession No. ML16169A060. A list of meeting attendees is provided in the enclosure to this meeting summary.

Meeting Summary

After introductions, the licensee proceeded to the slide presentation, first providing the reasons for the schedule change. The first reason was the fire probabilistic risk assessment (FPRA) peer review that was completed in 2016. The licensee stated that it received 40 findings, 6 of which did not meet the applicable supporting requirement of the American Nuclear Society/American Society of Mechanical Engineers probabilistic risk assessment (PRA) standard and 50 to 60 suggestions. SNC is continuing to refine the FPRA model due to this review and needs additional time to resolve the facts and observations (F&O) from the peer review.

A second reason provided for the schedule change is planned plant modifications. The licensee stated that the FPRA model does not include FLEX modifications nor degraded grid voltage protection modifications. The NRC staff questioned how FLEX affects the FPRA model. SNC replied that it is currently determining how the permanent versus temporary FLEX modifications will be accounted for in the PRA. As for the degraded grid voltage protection modifications, the licensee stated that the effects on the FPRA due to the addition of a third startup transformer are still unknown, considering that the rerouting plan for that transformer's cabling is still being

developed. Additionally, the NRC staff asked about any additional future LARs that need approval before the NFPA 805 amendment can be issued, and the SNC staff stated that it does not know of any at this time.

SNC also discussed that fire protection system hydraulic calculations and engineering equivalency evaluations will need to be performed before the application date. The NRC staff questioned the licensee as to why these calculations and evaluations are being performed at this time, because they should have been completed and in effect already for years. SNC responded that the calculations and evaluations are very old and need updating to modern standards.

The licensee discussed the 18-month extension request for completing the LAR. The NRC staff stated that it would like to see a list of milestones from the present time until the submittal date added into the extension request letter, because that demonstrates continual progress of the NFPA 805 LAR towards submittal to the NRC.

The licensee next provided a status of the FPRA model. An FPRA peer review was completed in April 2016, and the licensee stated that the FPRA met requirements of Regulatory Guide 1.200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities." The NRC staff asked why the peer review was performed so late, considering the original submittal date was supposed to be October 4, 2016. The licensee stated that it had a peer review performed in 2013 and the results were not acceptable; therefore, many changes to the FPRA model are needed. The NRC staff also asked if the licensee will continue to have peer reviews of the model after NRC approval. SNC stated that it will update its FPRA model every other refueling outage as per its procedures, but no further peer reviews are planned.

The licensee discussed the additional tasks remaining. The NRC staff asked if the licensee is using any new methods for the FPRA model. The licensee responded that new heat release rates and fire frequencies are used in the revised FPRA model. Additionally, the licensee stated it will not be using early warning fire detection of incipient sources (i.e., incipient detection) for HNP.

The licensee discussed the status of the traditional fire protection analysis. The NRC asked if the licensee will retain any past exemptions for its NFPA 805 LAR. SNC responded that it knew of five past NRC letters that provided approval for exemptions for fire-related requirements (with each letter containing one or more exemptions), but SNC was not going to retain any of those exemptions for the NFPA 805 LAR.

When the licensee discussed the table on the eighth slide, the NRC staff reemphasized that it is looking for milestones to be provided in the extension request letter that demonstrate SNC is continually working toward the submittal of the LAR. (The NRC staff is looking for assurances that the licensee did not procrastinate or delay its work, which would result in a rushed and low-quality product at the end of the 18-month extension.)

The licensee stated it desired to submit the LAR as quickly as possible because the current compensatory measure – fire watches, has become very expensive.

The NRC staff inquired how the licensee expects its FLEX strategies to affect the FPRA. The licensee responded that it expects a decrease change by a factor, but not by any order of magnitude.

The licensee summarized the additional discussions that it understands are needed in the extension request letter, which are (1) more information on the FPRA peer review results, (2) a more detailed schedule, with milestone dates, and (3) a discussion on the degraded grid voltage protection modifications and how the rerouted cables affect the FPRA.

To conclude the discussions, the NRC staff spoke about the timing of the LAR versus other licensees and the use of the many precedents over the past few years. The HNP LAR will be the last NFPA 805 LAR being reviewed. The licensee should make full use of the lessons learned from the many issued NFPA 805 amendments and errors should be minimized. The NRC will not have the schedule ability to work through technical disagreements. The licensee should ensure all analysis methods have been accepted by the NRC and all items in LAR Attachment S are finalized. The licensee should be prepared to accept an audit within the first year and an issuance of the amendment within 2 years. Requests for additional information response time of 60 days will be standard.

Members of the public were not in attendance. No Public Meeting Feedback Forms were received.

Please direct any inquiries to me at 301-415-3229 or Michael.Orenak@nrc.gov.



Michael D Orenak, Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-321 and 50-366

Enclosure:
List of Attendees

cc w/enclosure: Distribution via Listserv

LIST OF ATTENDEES
JUNE 21, 2016, PUBLIC MEETING WITH
SOUTHERN NUCLEAR OPERATING COMPANY, INC.
REGARDING DELAY OF APPLICATION DATE FOR
NFPA 805 LICENSE AMENDMENT REQUEST
EDWIN I. HATCH NUCLEAR PLANT, UNIT NOS. 1 AND 2

NAME	ORGANIZATION
Michael Orenak	U.S. Nuclear Regulatory Commission (NRC)
Greg Casto	NRC
Charles Moulton	NRC
Jay Robinson	NRC
Harold Barrett	NRC (telephone)
Ken McElroy	Southern Nuclear Operating Company (SNC)
Pamela Burns	SNC
Charles Musgrove	SNC
Len Casella	SNC
Michael Torrance	SNC
Famarz Pournia	SNC
John Lattner	SNC
Jack Curham	SNC

Enclosure

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/RA/

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NAME	MOrenak	LRonewicz	MMarkley	MOrenak
DATE	6/28/2016	6/28/2016	6/30/2016	6/30/2016