



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

June 26, 2017

Mr. James J. Hutto
Regulatory Affairs Director
Southern Nuclear Operating Company, Inc.
P.O. Box 1295 / Bin 038
Birmingham, AL 35201-1295

SUBJECT: VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2 –
SUPPLEMENTAL INFORMATION NEEDED FOR ACCEPTANCE OF
SYSTEMATIC RISK-INFORMED ASSESSMENT OF DEBRIS TECHNICAL
REPORT (CAC NOS. MF9685 AND MF9686)

Dear Mr. Hutto:

By letter dated April 21, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17116A096), Southern Nuclear Operating Company, Inc. (SNC) submitted a technical report for approval for Vogtle Electric Generating Plant, Units 1 and 2 (VEGP). In addition, the letter provided a supplemental response to Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized Water Reactors" (ADAMS Accession No. ML042360586) that supersedes previous responses. The technical report contains a risk-informed methodology to evaluate debris effects, except for vessel fiber limits. The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this technical report. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your application and concluded that the information described below is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements and the protection of public health and safety and the environment. Additionally, the NRC staff has concluded that the scope of the review needs to be clarified.

In order to make the application complete, the NRC staff requests that SNC supplement the application to address the information described below by 13 business days from date of this letter. This will enable the NRC staff to begin its detailed technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

Regulatory Guide 1.200, Rev. 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment [PRA] Results for Risk-Informed Activities" (ADAMS Accession No. ML090410014) describes an approach for determining whether the technical adequacy of a PRA is sufficient to provide confidence in the results and the guide describes information that the NRC staff expects to be included in risk-informed submittals. As discussed in the guide, a risk-informed submittal should contain discussions concerning peer review. If the peer review is not performed against the established standards, then information needs to be included in the submittal that demonstrates that the different criteria used are consistent with the established standards.

To support the NRC staff review, please, provide the following information for the risk-informed methodology described in the submitted technical report:

- For the seismic probabilistic risk assessment peer review facts and observations, provide a comparison that demonstrates that the criteria in ASME/ANS RA-Sb-2013 (Addendum B), which is not an established endorsed standard, are consistent with the ASME/ANS RA-Sa-2009 (Addendum A), which is an established endorsed standard.
- If the different criteria are not consistent with the established endorsed standards, an explanation that demonstrates that the analogous ASME/ANS RA-Sa-2009 (Addendum A) supporting requirements have been met.

Additionally, please, confirm that the scope of the requested technical report review is limited to Enclosures 1, 3, and 4 of the attachment to the SNC letter dated April 21, 2017. This will enable the NRC staff to properly disposition (incl., project planning) the portions of the submittal that are intend to supersede SNC's generic letter response for VEGP and the portions that comprise the technical report submitted for review and approval.

The information requested and associated timeframe in this letter were discussed with Mr. Ryan Joyce of your staff on June 19, 2017.

If you have any questions, please contact Mr. Michael Marshall at (301) 415-2871 or Michael.Marshall@nrc.gov or contact me at (301) 415-3229 or via email at Michael.Orenak@nrc.gov.

Sincerely,



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

Docket Nos. 50-424 and 50-425

cc: Distribution via Listserv

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