November 20, 2017

MEMORANDUM TO: Jennifer Dixon-Herrity, Chief
Licensing Branch 4
Division of New Reactor Licensing
Office of New Reactors

FROM: Jordan Hoellman, Project Manager ***/RA/***
Licensing Branch 4
Division of New Reactor Licensing
Office of New Reactors

SUBJECT: SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR OPERATING COMPANY ON NOVEMBER 9, 2017

The U.S. Nuclear Regulatory Commission (NRC) staff held a Category 1 public meeting with Southern Nuclear Operating Company (SNC) on November 9, 2017. The purpose of the meeting was to discuss issues associated with the safety review of licensing actions for SNC's Vogtle Electric Generating Plant (VEGP) Units 3 and 4.

The meeting notice can be found in the NRC's Agencywide Documents Access and Management System (ADAMS) under Accession No. ML17296A189. The meeting notice is also posted on the NRC public website. Enclosures 1 and 2 are the meeting agenda and attendance list for the meeting, respectively. The other documents referenced during the discussion can be found at the ADAMS Accession Nos. given below:

- Draft Initial Test Program (ITP) Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Consolidation License Amendment Request (LAR) 17-038 – ML17304A946
- Pre-Submittal Presentation for ITP ITAAC Consolidation LAR 17-038 – ML17305B326
- Operator Licensing Timeline – ML17312A369

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Summary of Meeting:

On November 9, 2017, staff from the NRC conducted a public meeting with representatives from SNC to discuss issues associated with the safety review of licensing actions for SNC's VEGP Units 3 and 4. Specifically, the meeting discussed (1) pre-submittal information regarding SNC's LAR 17-038 and (2) the requirements and process for an individual who passed the Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 NRC operator licensing exam to receive credit for that exam at VEGP Units 3 and 4.

The first topic discussed was pre-submittal information regarding SNC's LAR 17-038. SNC walked through the pre-submittal presentation, noting that during further review of ITAAC after the approval of LAR 17-006 (Amendment Nos. 85 and 84 (ADAMS Accession No. ML17216A064)), it became evident that additional ITAAC require redundant paperwork for closure and efficiencies can be gained from consolidating ITAAC primarily related to system testing. SNC stated that the LAR's scope consolidates 249 ITAAC into 57 ITAAC primarily impacting ITP, construction inspections, and security. SNC noted that the LAR proposes no changes to the design commitment, inspections, tests, analyses, or acceptance criteria language for each individual ITAAC being consolidated into another ITAAC and that the required ITA will be performed by the consolidated ITAAC. SNC described the four categories of ITAAC included in the consolidation LAR and discussed an example for each category. For Category 1, the staff asked why not all 274 ITP ITAAC were included in the LAR. SNC stated that not all of the ITP ITAAC have shared components that could be incorporated into a consolidated ITAAC and that some ITAAC are more complex than others (e.g., squib valve testing). The staff noted that they understood the consolidation LAR and asked if SNC has considered the impacts consolidation would have on the ITAAC surge that is expected near the completion of construction. SNC stated that they have considered the impact and noted that they plan to utilize the uncompleted ITAAC notification process and communications with the NRC to make staff aware of the ITAAC principle closure documents as they become available for inspection. The staff noted that the detailed review of the LAR would be performed when the LAR is formally submitted.

The second topic discussed was the requirements and process for an individual who passed the VCSNS Units 2 and 3 NRC operator licensing exam to receive credit for that exam at VEGP Units 3 and 4. SNC walked through the timeline, noting that they recently hired VCSNS Units 2 and 3 operators with NRC pass letters and enrolled them into the operator training program at VEGP Units 3 and 4. SNC stated that they plan to review the VCSNS Units 2 and 3 simulator load discrepancies list to identify differences from the VEGP Units 3 and 4 simulator that would affect operator response. SNC identified that performing a GAP analysis of the VCSNS Units 2 and 3 Initial License Training (ILT) program against the VEGP Units 3 and 4 ILT program will enable them to develop training for the VCSNS Units 2 and 3 operators to cover procedures that would affect operator response or decision making. SNC noted that they then plan to implement the training and evaluate the operators to cover items identified by the GAP analysis and submit the required documentation to the NRC (NRC Form 398). The staff noted that it will be crucial that SNC identify and evaluate the VCSNS Units 2 and 3 operators in areas with significant differences between the sites, such as administrative procedures, management expectations, emergency planning, and operations procedures. The staff also noted that SNC would need to request an exemption from Title 10 of the *Code of Federal Regulations* (10 CFR) 55.47(a)(1) since no AP1000 operator "has had extensive actual operating experience at a comparable facility, as determined by the Commission, within two years before the date of application." SNC stated that they understood the staff's comments and plan to incorporate them in their approach for obtaining NRC pass letters at VEGP Units 3 and 4.

At the end of each topic discussed, there was an opportunity for the public to provide comments and ask questions. There were no comments and questions from members of the public.

Docket Nos.: 052-025
052-026

Enclosures:
As stated

cc w/encls: See next page

SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR OPERATING COMPANY ON NOVEMBER 9, 2017 DATED NOVEMBER 20, 2017

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ADAMS Accession No.: ML17319A280 NRC-001

OFFICE	PM: DNRL/LB4	LA: DNRL/LB4	BC: DNRL/LB4	PM: DNRL/LB4
NAME	JHoellman (c)	RButler (c)	JDixon-Herrity (c)	JHoellman (s)
DATE	11/20/17	11/20/17	11/20/17	11/20/17

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AGENDA FOR PUBLIC MEETING
U.S. NUCLEAR REGULATORY COMMISSION (NRC)
Thursday, November 9, 2017
9:00 a.m. – 10:00 a.m.

PURPOSE: To discuss issues associated with the safety review of licensing actions for Southern Nuclear Operating Company's (SNC) Vogtle Electric Generating Plant (VEGP) Units 3 and 4.

OPEN

Time	Topic	Led By
9:00 a.m.	Opening Remarks	NRC
9:05 a.m.	Discussion of pre-submittal information regarding SNC License Amendment Request 17-038	NRC/SNC
9:30 a.m.	Opportunity for Public Comment	PUBLIC/NRC
9:30 a.m.	Discussion of the requirements and process for an individual who passed the Virgil C. Summer Nuclear Station (VCSNS) Units 2 and 3 NRC operator licensing exam to receive credit for that exam at VEGP Units 3 and 4	NRC/SNC
10:00 a.m.	Opportunity for Public Comment	PUBLIC/NRC
10:00 a.m.	Adjourn	

Enclosure 1

PUBLIC MEETING
UNITED STATES NUCLEAR REGULATORY COMMISSION
Thursday, November 9, 2017
9:00 a.m. – 10:00 a.m.

List of Attendees

Name	Organization
Representing the Nuclear Regulatory Commission	
Jordan Hoellman	NRO/DNRL/LB4
Jennifer Dixon-Herrity	NRO/DNRL/LB4
Tim McGinty	NRO/DCIP
Kerri Kavanagh	NRO/DCIP/QVIB3
Andrea Keim	NRO/DCIP/QVIB3
Aida Rivera	NRO/DCIP/HOIB
Chris Welch *	NRO/DCIP/HOIB
Jim Kellum *	NRO/DCIP/HOIB
Victor Hall *	NRO/DCIP/CIPB
Ian Spivack	NRO/DCIP/CIPB
John Frost	NSIR/DPCP/RSB
Judy Petrucelli	NSIR/DPCP/RSB
Eugene Guthrie *	RII/DRS/OB2
Bruno Caballero *	RII/DRS/OB2
Representing Industry	
Kelli Roberts	Southern Nuclear Operating Company (SNC)
Bob Beilke	SNC
Catherine Perego	SNC
Josh Olson	SNC
Greg Wilson	SNC
John Austin *	SNC
Eric Thompson *	SNC
Paul Mothena *	SNC
Mike Yox *	SNC
Stephanie Agee *	SNC
Ryan Henderson *	SNC
Paige Ridgway *	SNC
Tom Arnett *	SNC
Adam Quarles *	SNC
	SNC
Representing Public	
Tom Childress *	Florida Power & Light Company

* = participated via teleconference

Enclosure 2

Vogtle Units 3 & 4 Mailing List (Revised 11/07/017)

cc:

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Vogtle Units 3 & 4 Mailing List

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