

**FEB 26 2018**Docket Nos.: 52-025  
52-026

ND-18-0154

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555-0001

Vogtle Electric Generating Plant – Units 3 and 4  
Ninth Six-Month Status Report of the Implementation of the  
Requirements of the Commission Order with Regard to  
Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049)

## References:

1. NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012.
2. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012.
3. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012.
4. Vogtle Electric Generating Plant - Units 3 and 4 Overall Integrated Plan in Response to Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049), dated August 22, 2013.

## Ladies and Gentlemen:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an order (Reference 1) to Southern Nuclear Operating Company. Reference 1 was immediately effective and directed the Vogtle Electric Generating Plant - Units 3 and 4 (VEGP 3&4) to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 3 of Reference 1.

Reference 1 required submission of an Overall Integrated Plan within one year after issuance of the final NRC Interim Staff Guidance (ISG) (Reference 2). Reference 2 endorses industry guidance document NEI 12-06, Revision 0 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the VEGP 3&4 Overall Integrated Plan.

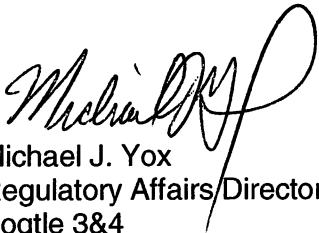
Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 3 provides direction regarding the content of the status reports and was followed in developing the enclosed report. The purpose of this letter is to provide the ninth six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The enclosed report provides an update of milestone accomplishments since the submission of the VEGP 3&4 Overall Integrated Plan, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no new NRC commitments. If you have any questions, please contact Dave Midlik at 706-848-6737.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 26<sup>th</sup> day of February 2018.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

  
Michael J. Yox  
Regulatory Affairs/Director  
Vogtle 3&4  
Southern Nuclear Operating Company

MJY/DWM/amw

Enclosure: Vogtle Electric Generating Plant - Units 3 and 4  
Ninth Six-Month Status Report of the Implementation of the  
Requirements of the Commission Order with Regard to  
Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049)

cc:

**Southern Nuclear Operating Company/ Georgia Power Company**

Mr. S. Kuczynski (w/o enclosure)  
Mr. D. A. Bost (w/o enclosure)  
Mr. M. D. Rauckhorst (w/o enclosure)  
Mr. M. D. Meier  
Mr. D. H. Jones (w/o enclosure)  
Mr. D. L. McKinney  
Mr. T.W. Yelverton  
Mr. B. H. Whitley  
Mr. C. R. Pierce  
Ms. A. G. Aughtman  
Mr. W. A. Sparkman  
Ms. A. C. Chamberlain  
Mr. O. J. Miller  
Mr. J. D. Williams  
Mr. M. J. Yox  
Mr. T. G. Petrak  
Ms. A. L. Pugh  
Mr. A. S. Parton  
Mr. M. K. Washington  
Ms. K. A. Roberts  
Ms. K. M. Stacy  
Mr. C. T. Defnall  
Mr. D. R. Culver  
Document Services RTYPE: VND.LI.L06  
File AR.01.02.06

**Nuclear Regulatory Commission**

Mr. W. Jones (w/o enclosure)  
Ms. J. M. Heisserer  
Mr. C. P. Patel  
Mr. M. E. Ernestes  
Mr. G. J. Khouri  
Mr. T. E. Chandler  
Ms. S. E. Temple  
Ms. P. Braxton  
Mr. F. D. Brown  
Mr. A. J. Lerch  
Mr. C. J. Even  
Ms. V. L. Ordaz  
Ms. L. A. Kent  
Mr. P. B. Donnelly  
Mr. N. D. Karlovich  
Ms. C. D. Taylor  
Ms. A. E. Rivera-Varona  
Mr. B. J. Kemker

U. S. Nuclear Regulatory Commission  
ND-18-0154  
Page 4

**Oglethorpe Power Corporation**

Mr. R. B. Brinkman

**Municipal Electric Authority of Georgia**

Mr. J. E. Fuller

Mr. S. M. Jackson

**Dalton Utilities**

Mr. T. Bundros

**Westinghouse Electric Company, LLC**

Mr. R. Easterling (w/o enclosure)

Mr. G. Koucheravy (w/o enclosure)

Ms. K. B. Chesko

Mr. J. Hopkins

Mr. D. Hawkins

Mr. M. L. Clyde

Mr. J. Watkins

**Other**

Mr. J. E. Hesler, *Bechtel Power Corporation*

Ms. L. A. Matis, *Tetra Tech NUS, Inc.*

Dr. W. R. Jacobs, Jr., Ph.D., *GDS Associates, Inc.*

Mr. S. Roetger, *Georgia Public Service Commission*

Ms. S. W. Kernizan, *Georgia Public Service Commission*

Mr. K. C. Greene, *Troutman Sanders*

Mr. S. Blanton, *Balch Bingham*

**Enclosure**

**Vogtle Electric Generating Plant – Units 3 and 4  
Ninth Six-Month Status Report of the Implementation of  
the Requirements of the Commission Order with Regard to  
Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049)**

**Vogtle Electric Generating Plant – Units 3 and 4  
Ninth Six-Month Status Report of the Implementation of  
the Requirements of the Commission Order with Regard to  
Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049)**

**1 Introduction**

Vogtle Electric Generating Plant - Units 3 and 4 developed an Overall Integrated Plan (Reference 1 in Section 8), documenting the diverse and flexible strategies (FLEX), in response to Reference 2. This enclosure provides an update of milestone accomplishments since submittal of the Overall Integrated Plan, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

**2 Milestone Accomplishments**

In addition to the submittal of status reports, the following milestone(s) directly related to FLEX implementation have been completed since the development of the Overall Integrated Plan (Reference 1), and are current as of February 28, 2018:

- None

**3 Milestone Schedule Status**

The following provides an update to Attachment 2 of the Overall Integrated Plan. It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed. The revised milestone target completion date does not impact the Order implementation date.

Enclosure to ND-18-0154  
 Ninth Six-Month Status Report of FLEX Implementation

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Submit 60 Day Status Report	Oct 2012	Complete	N/A
Submit Overall Integrated Plan	Aug 2013	Complete	N/A
Submit 6 Month Status Report	Feb 2014	Complete	N/A
Submit 6 Month Status Report	Aug 2014	Complete	N/A
Submit 6 Month Status Report	Feb 2015	Complete	N/A
Submit 6 Month Status Report	Aug 2015	Complete	N/A
Submit 6 Month Status Report	Feb 2016	Complete	N/A
Submit 6 Month Status Report	Aug 2016	Complete	N/A
Submit 6 Month Status Report	Feb 2017	Complete	N/A
Submit 6 Month Status Report	Aug 2017	Complete	N/A
Submit 6 Month Status Report	Feb 2018	Complete	N/A
Submit 6 Month Status Report	Aug 2018	Not Started	
Submit 6 Month Status Report	Feb 2019	Not Started	
Submit 6 Month Status Report	Aug 2019	Not Started	
Staffing Analysis Completed	Oct 2019	Not Started	
Ensure Operational Procedures include necessary information	Nov 2019	Not Started	
Develop Response Plan with NSRC (storage plan and procedural guidance for strategy /maintenance)	Nov 2019	Not Started	
Initiate Phase 3 Equipment Procurement	Dec 2019	Not Started	
Submit 6 Month Status Report	Feb 2020	Not Started	
Training Complete for Phase 3 FLEX strategies	Aug 2020	Not Started	
NSRC Operational for Vogtle 3&4	Aug 2020	Not Started	
Submit 6 Month Status Report	Aug 2020	Not Started	
Demonstration for Unit 3	Oct 2020	Not Started	Apr 2020 <sup>1</sup>
Completion Report For Unit 3	Dec 2020	Not Started	
Submit 6 Month Status Report	Feb 2021	Not Started	
Demonstration for Unit 4	Apr 2021	Not Started	
Submit Completion Report For Unit 4	Jun 2021	Not Started	

Unit 3 - Full compliance prior to Fuel Load for Unit 3  
 Unit 4 - Full compliance prior to Fuel Load for Unit 4

<sup>1</sup>The revised target completion date does not impact the Order implementation date.

#### 4 Changes to Compliance Method

There are no changes to the compliance method as documented in the Overall Integrated Plan (Reference 1 of this enclosure).

## 5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

Vogtle Electric Generating Plant - Units 3 and 4 expects to comply with the order implementation date and no relief/relaxation is required at this time.

## 6 Open Items from Overall Integrated Plan and Draft Safety Evaluation

The following tables provide a summary of the open items documented in the Overall Integrated Plan or the Draft Safety Evaluation (SE) and the status of each item.

Overall Integrated Plan Open Item	Status
N/A	N/A

Draft Safety Evaluation Open Item	Status
None Received to date	N/A

## 7 Potential Draft Safety Evaluation Impacts

There are no potential impacts to the Draft Safety Evaluation identified at this time.

## 8 References

The following references support the updates to the Overall Integrated Plan described in this enclosure.

1. Vogtle Electric Generating Plant - Units 3 and 4 Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated August 22, 2013.
2. NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012.
3. Vogtle Electric Generating Plant - Units 3 and 4 60-Day Response to NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Daiichi Accident, dated March 12, 2012 (ND-12-0987).
4. NRC Letter dated March 12, 2012, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50. 54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident."