

## Vogle PEmails

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**From:** Gleaves, Bill  
**Sent:** Wednesday, February 28, 2018 2:22 PM  
**To:** Adam Quarles (AGQUARLE@southernco.com)  
**Cc:** Wes Sparkman (WASPARKM@southernco.com); Dixon-Herrity, Jennifer; Chamberlain, Amy Christine; Vogtle PEmails; Makar, Gregory; Terry, Leslie  
**Subject:** Vogtle LAR-17-039 Draft Audit Plan dated 2-28-18  
**Attachments:** Vogtle LAR-17-039 Draft Audit Plan 2-28-18.pdf

Adam,

Attached is our draft Audit Plan for LAR-17-039, "Unqualified Service Level 1 Coatings Program."

You will find the document has highlighted in yellow, places where we are looking for you to propose some information. We would like to hear from you if you have questions or quick feedback we should be able to put together a quick phone call to work out the administrative details. Once we receive information that we need to complete this plan, I will issue the updated version as "final."

I don't believe there is any information in this email or the attached document that is sensitive, if you disagree, let me know as soon as you know so that I can prevent it from being released in ADAMS. The adams record will show this email and the attachment and will have 1 assigned ADAMS ML#.

Respectfully,

Billy  
William (Billy) Gleaves  
Senior Project Manager  
Licensing Branch 4  
Office OWFN 8H17  
US NRC, Office of New Reactors

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**Hearing Identifier:** Vogtle\_COL\_Docs\_Public  
**Email Number:** 229

**Mail Envelope Properties** (BY2PR09MB1032C4CB96C80A545BA9EB799FC70)

**Subject:** Vogtle LAR-17-039 Draft Audit Plan dated 2-28-18  
**Sent Date:** 2/28/2018 2:22:00 PM  
**Received Date:** 2/28/2018 2:22:07 PM  
**From:** Gleaves, Bill

**Created By:** Bill.Gleaves@nrc.gov

**Recipients:**

"Wes Sparkman (WASPARKM@southernco.com)" <WASPARKM@southernco.com>  
Tracking Status: None  
"Dixon-Herrity, Jennifer" <Jennifer.Dixon-Herrity@nrc.gov>  
Tracking Status: None  
"Chamberlain, Amy Christine" <ACCHAMBE@southernco.com>  
Tracking Status: None  
"Vogtle PEmails" <Vogtle.PEmails@nrc.gov>  
Tracking Status: None  
"Makar, Gregory" <Gregory.Makar@nrc.gov>  
Tracking Status: None  
"Terry, Leslie" <Leslie.Terry@nrc.gov>  
Tracking Status: None  
"Adam Quarles (AGQUARLE@southernco.com)" <AGQUARLE@southernco.com>  
Tracking Status: None

**Post Office:** BY2PR09MB1032.namprd09.prod.outlook.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	1353	2/28/2018 2:22:07 PM
Vogtle LAR-17-039 Draft Audit Plan 2-28-18.pdf		107202

**Options**

**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

**PLAN FOR THE REGULATORY AUDIT OF**  
**SOUTHERN NUCLEAR OPERATING COMPANY, INC..**  
**VOGTLE ELECTRIC GENERATING PLANT, UNITS 3 AND 4.**  
**PROTECTIVE COATINGS PROGRAM**  
**DOCKET NOS. 52-025 AND 52-026**

**LICENSEE:**

Southern Nuclear Operating Company, Inc. (SNC)

**LICENSEE CONTACTS:**

- Adam Quarles, SNC

**DURATION:**

38 days

[INSERT DATES – WE CAN START AS SOON AS SNC IS READY]

**LOCATIONS:**

Local SNC Office

Electronic Reading Room (eRR)

**AUDIT TEAM:**

- Gregory L. Makar (Office of New Reactors (NRO)/Materials and Chemical Engineering Branch (MCB), Materials Engineer, Audit Lead)
- Leslie S. Terry (NRO/MCB, Materials Engineer)
- Matthew A. Mitchell (NRO/MCB, Branch Chief)
- Billy Gleaves (NRO, Project Manager (PM))
- Supporting staff (as needed)

**BACKGROUND AND OBJECTIVES**

By letter dated November 3, 2017 (Accession No. ML17307A201 in the U.S. Nuclear Regulatory Commission's (NRC) Agencywide Documents Access and Management System), SNC requested NRC approval of an amendment to Combined License Numbers NPF-91 and NPF-92 for Vogtle Electric Generating Plant (VEGP), Units 3 and 4; and a permanent exemption from certain elements of the generic Advanced Passive 1000 (AP1000) Design

Enclosure

Control Document (DCD). This license amendment request (LAR) was designated by SNC as LAR 17-039. Specifically, the amendment and exemption are related to a proposed administrative program to manage a limited quantity of unqualified coatings in Service Level I areas (areas inside containment). Section 6.3.2.2.7.1 in Revision 19 of the AP1000 DCD, "General Screen Design Criteria," describes limits on the amount of coatings in the debris mixture following a postulated loss of coolant accident (LOCA).

Protective coatings are addressed in Section 6.1.2.1, "Protective Coatings," in Tier 2 of the Updated Final Safety Analysis Report (UFSAR) for VEGP, Units 3 and 4. As part of the overall technical review of LAR 17-039, and in order to understand how the proposed program would be implemented within the overall program for coatings in containment, the NRC staff determined it is necessary to audit information supporting the VEGP, Units 3 and 4, protective coatings program. Specifically, the NRC staff intends to audit information supporting the LAR, such as tracking documents being used to ensure the potential coating debris is maintained within the licensing basis limits (i.e., nonconforming coatings and other coating types), the technical evaluation and tracking process for nonconformances and managing unqualified coatings (i.e., periodic reassessment and tracking document updates), and the process for assessing the effect of nonconformances on other design and licensing limits. The NRC staff will conduct this audit in accordance with the guidance in NRO-REG-108, "Regulatory Audits."

The objectives of this audit are to enable the NRC staff to:

- Gain a better understanding of information underlying the VEGP, Units 3 and 4, protective coatings program; and
- Identify information that fundamentally supports the basis of the regulatory decision which may require docketing.

### **REGULATORY AUDIT BASIS**

An audit is required to examine detailed information related to the licensee's protective coatings program, and reach a safety conclusion on the license amendment and exemption request described above. The NRC staff must have sufficient information to ensure that acceptable risk and reasonable assurance of safety can be documented in the NRC staff's safety evaluation.

This regulatory audit is based on the following regulations:

- General Design Criteria (GDC) 1, "Quality standards and records," of Appendix A to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities"
- GDC 4, "Environmental and dynamic effects design bases," of Appendix A to 10 CFR Part 50
- GDC 35, "Emergency core cooling," of Appendix A to 10 CFR Part 50
- GDC 38, "Containment heat removal," of Appendix A to 10 CFR Part 50
- 10 CFR 50.46(b)(5), "Long-term cooling"

- 10 CFR 52, Appendix D, “Design Certification Rule for the AP1000 Design”
- Regulatory Guide (RG) 1.54, “Service Level I, II, and III Protective Coatings Applied to Nuclear Power Plants”
- RG 1.82, “Water Sources for Long-Term Recirculation Cooling Following a Loss-of-Coolant Accident”
- Enclosure 2, “Coatings Evaluation Guidance for NRC Review of Generic Letter 2004-02 Supplemental Responses Prepared by the Office of Nuclear Reactor Regulation, Division of Component Integrity,” of “Revised Guidance for Review of Final Licensee Responses to Generic Letter 2004-02, “Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors,” dated March 28, 2008

### **REGULATORY AUDIT SCOPE**

The specific scope of this audit is information related to tracking documents being used to ensure the potential coating debris is maintained within the licensing basis limits (i.e., nonconforming coatings and other coating types), the technical evaluation and tracking process for nonconformances and managing unqualified coatings (i.e., periodic reassessment and tracking document updates), and the process for assessing the effect of nonconformances on other design and licensing limits.

The documents supporting the technical areas listed above are to be made available to the NRC staff in the SNC eRR or at the local SNC office. The documents already identified by the NRC staff are listed below. Additional documents will be requested by the NRC staff as needed (when referenced by a document being audited by the NRC staff, for instance), and these documents will be added to the audit report prepared by the NRC staff following the conclusion of the audit.

#### **Documents Requested [REPLACE BULLETED ITEMS WITH SPECIFIC DOCUMENT REFERENCES]**

- All tracking documents needed to ensure potential coatings debris remains within the licensing basis for post-LOCA Emergency Core Cooling System operation and long-term cooling (i.e., nonconforming coatings and other coating types).
- Procedures for the technical evaluation of coating nonconformances, including procedures for assessing the effect of coating nonconformances on other design and licensing limits.
- Procedures for tracking coatings (i.e., periodic reassessment and updating tracking documents).
- Other documents the licensee considers useful in reviewing the technical areas listed above.

### **DATE/TIME/LOCATION/SPECIAL REQUESTS**

The audit will begin with an entrance meeting on [INSERT DATE], via conference call.

The NRC staff asks that the requested documents be available to the NRC auditors in the SNC eRR during the period of [INSERT DATE] thru [INSERT DATE]. Use of the eRR allows multiple auditors in different geographic locations to examine the same document at the same time

which improves the efficiency and reduces the cost of the audit. Additional documents may be identified as the review progresses. When the NRC staff's review of the documents associated with a specific issue is complete the NRC staff will notify either the NRO PM or SNC that these documents can be removed from the eRR. The NRC staff also expects that SNC personnel knowledgeable in the audit topics be available to the NRC staff (if the request comes with reasonable notification).

If the audit is expanded such that information is required to be reviewed at the local SNC office, then in addition to the previous requests, the NRC staff requests that a conference room with a speaker phone be available.

### **AUDIT ACTIVITIES AND DELIVERABLES**

The NRC staff acknowledges that the information requested may be proprietary or sensitive. It will be handled appropriately throughout the audit. While the NRC staff will take notes, they will not remove hard copy or electronic files from the audit site(s), and the notes will be marked accordingly. SNC will be informed if any NRC contractors are participating in the audit. Any materials generated will be evaluated and approved through standard NRC processes for handling sensitive material.

The NRC will hold two status calls and/or meetings with SNC, no later than **[INSERT DATE]**, and **[INSERT DATE]**, to identify issues that have been closed or will be resolved by other mechanisms, such as requests for additional information or public meetings. In the status meetings, the NRC will also identify any emerging information needs as well as documents that can be removed from the eRR. The NRC will hold a conference call or meeting to exit the audit.

If necessary, any circumstances related to the conduct of the audit will be communicated to the NRC Project Manager, Bill Gleaves at 301-415-5848 or [Bill.Gleaves@nrc.gov](mailto:Bill.Gleaves@nrc.gov).