



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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April 12, 2018

MEMORANDUM TO: Kerri A. Kavanagh, Chief
Quality Assurance Vendor Inspection Branch-2
Division of Construction Inspection
and Operational Programs
Office of New Reactors

FROM: Thomas Fredette, Reactor Operations Engineer */RA/*
Construction Inspection Program Branch
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Office of New Reactors

SUBJECT: SUMMARY OF PUBLIC MEETING WITH SOUTHERN NUCLEAR
TO DISCUSS ACTIVITIES RELATED TO THE AP1000 INITIAL
TEST PROGRAM AT VOGTLE UNITS 3 & 4

The U.S. Nuclear Regulatory Commission (NRC) staff held a Category 2 public meeting with representatives of Southern Nuclear Operating Company (SNC) on March 27, 2018. The purpose of the meeting was to discuss status and issues associated with the AP1000 Initial Test Program to be implemented at SNC's Vogtle Units 3 & 4 construction projects.

The meeting notice can be found in the Agencywide Documents Access and Management System (ADAMS) under accession number ML18072A128. The meeting notice is also posted to the NRC's public website. The meeting agenda and attendance list are provided as enclosures to this document. An additional enclosure contains questions submitted by a member of the public an advance of the meeting and the staff responses to those questions. Presentation slides referenced during the open portion of the meeting can be found at the following ADAMS accession numbers:

"Initial Test Program (ITP) Inspection Planning Meeting" ML18078A096

Summary of Meeting:

On March 27, 2018, staff from the NRC Office of New Reactors and Region II conducted a public meeting with representatives from SNC to discuss issues associated with the AP1000 Initial Test Program (ITP) to be implemented for Vogtle Units 3 and 4. The meeting was a forum for the licensee to update the NRC staff on ITP development.

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The NRC staff provided a brief overview of ITP oversight and regulatory objectives, and an introduction of new NRC staff that will be engaged in ITP oversight. SNC provided an overview of progress at the Vogtle construction site, and highlighted that the focus has been on test procedure development, and that they expected the first power block testing to commence in the latter half of 2018. SNC also provided highlights of recent and current licensing actions, specifically:

- SNC's intent is to submit a license amendment requests (LAR) covering China First Plant Only and First 3 Plants Only testing (FPOT/F3POT) applicability. SNC will split the scope of the LAR to cover preoperational tests and start-up tests separately; planned submittal of the preoperational test scope is July 2018. A technical exchange between SNC and NRC took place during the March 8, 2018 public meeting.
- SNC provided an overview of two LARs submitted in Fall 2017 for natural circulation/passive residual heat removal (PRHR) start-up FPOT, and changes to the methodology and acceptance criteria for PRHR heat transfer and in-containment refueling water storage tank (IRWST) heat up tests. Responses to these LARs are expected in mid- to late-2018.

At the end of this portion of the meeting, there was an opportunity for members of the public to provide questions and comments to NRC staff. The enclosed questions, submitted in advance of the meeting, were verbally addressed by the staff. The public portion of the meeting was then adjourned.

During the closed portion of the meeting, SNC provided an updated ITP organizational structure and objectives for completing test procedure and test specification development. Additionally, the following topics were discussed:

- Changes and restructuring/consolidation of the SNC ITP administrative manual
- Transition from the Westinghouse QA to SNC QA program
- Progress and schedule for test procedure development
- Test packages to support uncompleted ITAAC notification (UIN) submittals and ITP-related UINs
- Potential licensing change to incorporate "graded approach to testing" into the Vogtle UFSAR
- Overview of preoperational test procedure development

Through the course of discussion, several actions were captured as a result of this meeting:

- Provide clarification as to "when EQ qualified life begins" (installation, testing, operation?) – due to Region II
- Consider "important to safety" equipment under graded approach (i.e. regulatory treatment of non-safety systems (RTNSS) equipment) – due to NRO
- Review implementing SNC audit procedure for WEC test specification development (appropriate oversight) – due to NRO
- Schedule workshop (tabletop exercise) to review test specification and procedure for system (TBD); to be conducted prior to ITP administrative manual inspection June 25th – due to NRO
- Provide guidance for NRC project schedule users to identify ITP activities of interest – due to Region II

SNC and NRC agreed to conduct working-level (ITP planning) meetings going forward on a quarterly basis. After a review of the above action items, the closed portion of the meeting was adjourned.

Docket Nos. 52-025 and 52-026

Enclosures:

1. Agenda
2. List of Attendees
3. Questions from the Public
(submitted in advance)

SUBJECT: SUMMARY OF PUBLIC MEETING WITH SOUTHERN NUCLEAR TO DISCUSS
ACTIVITIES RELATED TO THE AP1000 INITIAL TEST PROGRAM AT VOGTLE
UNITS 3 & 4 Dated: April 12, 2018

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| DATE | 04/12/18 | 04/12/18 |

OFFICIAL RECORD COPY

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cc:

(Revised 03/08/2018)

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Meeting Agenda:

| Topic | Time | Lead |
|---------------------------------|---------------------|------|
| *** Open Session *** | | |
| Introduction / Opening Remarks | 8:30 am – 8:40 am | NRC |
| NRC Perspectives on ITP | 8:40 am – 9:00 am | NRC |
| ITP Goals, Testing and Status | 9:00 am – 9:15 am | SNC |
| Public Questions and Comments* | 9:15 am – 9:30 am | |
| Break | 9:30 am – 9:35 am | All |
| *** Closed Session *** | | |
| Organizational Chart | 9:35 am – 9:50 am | SNC |
| Administrative Procedures | 9:50 am – 10:50 am | SNC |
| Schedule | 10:50 am – 12:00 pm | SNC |
| Lunch | 12:00 pm – 1:00 pm | All |
| UINs / ITAAC | 1:00 pm – 1:20 pm | SNC |
| Licensing Topics | 1:20 pm – 2:00 pm | SNC |
| Test Procedure Development | 2:00 pm – 3:30 pm | SNC |
| Review of Action Items | 3:30 pm – 3:45 pm | All |
| Closing Remarks and Adjournment | 3:45 pm – 4:00 pm | NRC |

*The public will have an opportunity to ask questions and/or comment.

Meeting Attendance:

| | |
|-------------------|-------------------------|
| Southern Nuclear- | |
| Catherine Perego | Vogtle Licensing |
| Thomas Petrak | Vogtle ITAAC |
| Robert Nicoletto | Vogtle ITP |
| Allen Nix | Vogtle Startup Test |
| Terrence Forehand | Vogtle ITP |
| David Martrano | Vogtle ITP |
| Craig Ingold | Vogtle ITP |
| Josh Olson | Vogtle ITAAC |
| Lindsey Grissom | Vogtle Licensing |
| Amanda Pugh | Vogtle Licensing |
| Jeremiah Haswell | GPC Nuclear Development |
| Duong Nguyen | GPC Nuclear Development |
| Steve Leighty* | Vogtle Licensing |

Georgia Public Service Commission-
Bill Jacobs
Doug Cheshire
Shemetha Jones
Steven Roetger

| | |
|-------------------|---------------------|
| Public- | |
| Ms. Glenn Carroll | Nuclear Watch South |
| Bill Freebairn* | S&P Global Platts |

| | |
|-----------------|-----------|
| NRC Staff- | |
| Shakur Walker | Region II |
| Kerri Kavanagh | NRO |
| Lisa Castelli | Region II |
| Jermaine Heath | NRO |
| Robert Mathis | Region II |
| Taylor Lamb* | NRO |
| Chris Welch* | NRO |
| Thomas Fredette | NRO |

*via telephone

Public Participation:

The following questions from the public were provided to NRC staff and responses were formulated in advance of the meeting:

1) How many NRC inspectors are assigned to Vogtle construction? How many are on site on a given day?

NRC response – The NRC has five resident inspectors assigned to the Vogtle construction project. They are augmented by regional and NRC HQ-based inspectors from time to time depending on the inspection expertise required for a given construction inspection.

2) How many inspectors are assigned to Chinese AP1000 construction?

NRC response - The NRC has sent 13 inspectors to Sanmen as part of the inspector exchanges with the Chinese regulatory agency, NNSA since April 2010. These inspector exchanges have been from two weeks to three months in length and have not been continuous coverage. The length of the exchanges have varied due to the scope of the inspections and the time of the year. The NRC has no regulatory authority over the Chinese AP1000 construction and are only able to send inspectors as guests of the Chinese regulator. The Vogtle licensee also has had representatives on site at Sanmen as guests of the Chinese AP1000 owner. The NRC continues to engage SNC, during meetings such as these, to benefit from their firsthand experience and access to the China projects.

The Chinese regulator has multiple inspectors on site during construction at Sanmen and Haiyang.

3) How would NRC approach reconciling design and regulatory differences between Chinese AP1000 and Georgia Power AP1000?

NRC response - The NRC has been conducting inspections at Westinghouse and their design partners' facilities since early 2008 evaluating changes to the design. During our inspections we sample design changes to ensure that Westinghouse has controlled the design consistent with their NRC approved quality assurance program. These samples have included changes made to Vogtle based on changes to the Chinese facilities.

4) How many stop work suspensions presently at Vogtle 3 & 4 due to problems with blueprints?

This question was deferred to SNC. There are currently no stop work suspensions or stop work orders in place at the Vogtle construction project.

5) Do NRC inspectors oversee component construction for Vogtle 3 & 4 at the vendor or at the site? Or some other way?

NRC response - The licensee is responsible for overseeing component construction for their facilities. However, the NRC has a vendor inspection program which performs inspections of component manufacturers for both the new Vogtle reactors and the operating fleet. The NRC performs vendor inspections to verify that the licensee is properly overseeing their vendors/suppliers and to verify, on a sampling basis, that the vendors/suppliers are manufacturing components consistent with the design and quality requirements.