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Purpose for the License Amendment Request

Overview of License Amendment Request



- Number of plants have incorporated a change to Technical Specification 5.2.2 organizational requirements to allow combining the STA position with an on-shift SRO position
 - Palo Verde – reduce EP staffing by one to eliminate one of three STA positions
 - St Lucie – allowed single qualified individual to serve as an STA/on-site SRO
 - Vogtle 1&2 – limit STA function to PWR Modes 1, 2, 3, and 4
- Aligns Technical Specification 5.2.2.g for each SNC site similar to the STS wording (NUREGs 1431 and 1433) as approved in TSTF-258, Revision 4.
- GL 86-04 provides option of dual-role STA position and encouraged by the Commission.
- SROs serving in this role will also be dual-role SRO/STA qualified.

Overview of License Amendment Request (continued)



- Provides flexibility to the on-shift staffing by re-defining the Shift Technical Advisor (STA) role from a dedicated position to a function at Farley (FNP) and Hatch (HNP).
 - The current Vogtle 1&2 (VEGP) TS wording does not require a dedicated STA position.
- Will also incorporate wording related to the modes of operation during which the individual meeting the requirements in Section 5.2.2g is required and provide guidance that the same individual may fill this position for both units.
- On approval, Section 5.2.2g would be consistent for all three SNC operating sites.

Overview of License Amendment Request (continued)



- This LAR will also discuss changes to the HNP and FNP Emergency Plan Minimum on-shift staffing tables related to NUREG-0654 Table B-1
- Updating HNP and FNP EP minimum staffing tables to re-define STA as a function versus a position, which reduces the minimum on-shift staffing for each site from 25 to 24.
- EP Table change for HNP and FNP is included in the LAR per 10 CFR 50.54.q(4)

License Amendment Request Content



Enclosure 1: Basis for Proposed Changes

- Discuss TS changes and EP staffing changes, as necessary

Attachment 1: Marked-up TS Pages

- Includes Farley (FNP) and Hatch (HNP); Vogtle (VEGP) 1&2 TS marked-up pages in this attachment

Attachment 2: Clean typed TS Pages

Attachment 3: Marked-up Emergency Plan pages

- Includes FNP and HNP; VEGP 1&2 are remaining the same

Attachment 4: Clean typed Emergency Plan pages

Attachment 5: Summary of HNP Staffing Study

Attachment 6: Summary of FNP Staffing Study



The Shift Technical Advisor (STA) shall provide advisory technical support to the [responsible SRO]¹ in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. [The same individual may fill this position for both units.]²

¹ The HNP TS states “shift supervisor” instead of “responsible SRO”.

² The HNP TS does not contain this final statement.



An individual shall be assigned who provides technical support in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall be available for duty when the plant is in modes 1-4. At other times, this individual is not required. In addition, this individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. This position may also be filled by the Shift Superintendent or the individual with an SRO license provided that person meets the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.



An individual shall provide advisory technical support to the unit operations shift crew in areas of thermal hydraulics, reactor engineering, and plant analysis with regard to safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. This individual shall be available for duty when an operating unit is in [MODE 1, 2, 3, or 4]³. This same individual may provide advisory technical support for both units.

³MODE 1, 2, or 3 for HNP.

Sentence added regarding Modes is currently in VEGP Tech. Specs.
Sentence regarding individual can provide the role for both units currently in FNP Tech. Specs.



Overview of the HNP and FNP Emergency Plan Staffing Studies

Emergency Plan Staffing Studies



- HNP and FNP Staffing Studies were updated based upon the SER approved Standard Emergency Plan.
- Performed in accordance with NEI 10-05 to document the adequacy of shift staffing as required by 10 CFR 50 Appendix E.
- NRC staff guidance directs the scenarios that must be used to demonstrate the adequacy of on-shift staffing to perform required functions for event mitigation, radiation protection response, firefighting, chemistry and Emergency Plan functions. Those scenarios include specific design basis accidents as described in the FSAR as well as specific scenarios defined in the Staff Guidance document.
- NEI 10-05 Appendix A events were either analyzed for HNP and FNP or reason provided that the events were not included in the study
 - 9 of 14 events were analyzed for FNP
 - 8 of 12 events were analyzed for HNP

Emergency Plan Staffing Study Conclusion



- The minimum staff for FNP and HNP is adequate to respond to the scenarios identified in the regulations until relieved by the augmented ERO.
- The analysis showed that the number of on-shift personnel are sufficient to respond to analyzed events until augmented by the ERO 75 minutes after event declaration and that no conflicts in responsibilities exist.
- NEI 12-01 staffing study (FLEX/BDB) was also updated concurrent with the NEI 10-05 update.



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