

May 25, 2018

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52-026

ND-18-0665

U. S. Nuclear Regulatory Commission
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Mr. Brian J. McDermott, Director
Office of Nuclear Security and Incident Response
U.S Nuclear Regulatory Commission
Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant – Units 3 and 4
Security Plan Force-on-Force Triennial Inspection Schedule Update

References:

1. Letter to NRC, "Security Plan Force-on-Force Triennial Inspection Schedule" from Southern Nuclear Operating Company Vogtle Electric Generating Plant Units 3 and 4, Jeffrey T. Gasser, Letter No. ND-14-1409, dated October 16, 2014
2. Letter from NRC to Jeffrey T. Gasser, Executive Vice President Southern Nuclear Operating Company, Inc., dated December 10, 2014, (ML14307A964)

Mr. McDermott:

The purpose of this letter is to update the schedule previously communicated in Reference 2. In accordance with 10 CFR 73.55, Southern Nuclear Operating Company (SNC), the licensee for Vogtle Electric Generating Plant (VEGP) Units 3 and 4, will establish, maintain, and implement a performance evaluation program (PEP) in accordance with Appendix B to 10 CFR 73.55. VEGP Units 3 and 4 are co-located on the Vogtle site with VEGP Units 1 and 2. Prior to fuel load for VEGP Unit 3, the protected area circumscribing VEGP Units 1 and 2 will be expanded to include VEGP Unit 3. Similarly, prior to fuel load for VEGP Unit 4, the protected area circumscribing VEGP Units 1, 2, and 3 will be expanded to include VEGP Unit 4. Final site configuration will consist of a common protected area (PA) circumscribing all four VEGP units as described in the Combined License (COL) Physical Security Plan (PSP).

The COL PSP is in effect as a licensing document as of the issuance of the COL and will be fully implemented on each unit prior to fuel load for that unit. To meet the requirements in the Training and Qualification portion of the plan, SNC will be hiring and training officers that meet the skills, knowledge and experience required for qualification. As part of the development and verification of the VEGP protective strategy (to include Unit 3 once the Unit 3 Protected Area is declared operational), target sets related to Unit 3 must be identified and appropriate response

resources located. SNC will be performing tabletop exercises, limited scope drills and Force-on-Force (FOF) exercises to establish and validate the response time lines and response positions required to protect the Unit 3 target set components. At some point, these tabletop exercises, limited scope drills and FOF exercises will be expanded to test the protective strategy for the common protected area enclosing Units 1, 2, and 3. Finally, prior to fuel load, SNC will test and validate the combined three unit site protective strategy in order to ensure that it meets the high assurance performance requirement of 10 CFR 73.55. A similar process will be followed to expand the protected area to enclose Units 1, 2, 3, and 4.

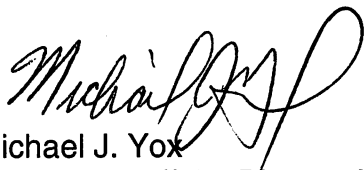
Once the SNC PSP inclusive of VEGP Unit 3 is implemented fully, SNC will be required to include Unit 3 in the conduct of quarterly drills and annual exercises to fulfill the requirements of the PEP. Based on the current FOF schedules, the next NRC evaluated FOF for VEGP Units 1 and 2 is planned for 2019, two years before Unit 3 becomes operational. Since the current construction schedule does not anticipate fuel load prior to 2020, it is unlikely that the Unit 3 protective strategy would be evaluated as a part of the 2019 NRC evaluated FOF. Given the current NRC three year evaluated FOF schedule, the next VEGP NRC Evaluated FOF would be in 2022, at which time all four units are currently scheduled to be operational. In all configurations, SNC will follow the site schedule for quarterly drills and annual exercises as the units become operational and will include the appropriate areas of the site in those drills and exercises required by the PEP. As this proposed scheduling of the evaluated FOF exercises complies with Appendix B to 10 CFR 73.55, the requirements of 10 CFR 73.55 are met.

This letter is submitted to document SNC plans, which are consistent with those previously communicated in Reference 2, for conducting FOF exercises that may be observed and inspected by the NRC for VEGP as it relates to the licensing basis of VEGP Units 3 and 4.

This letter does not contain any new regulatory commitments. If you have any questions, please contact Mr. Jeffery T. Todd at (706) 848-5555.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



Michael J. Yox
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