Vogtle PEmails

From: Hoellman, Jordan
Sent: Friday, June 1, 2018 9:35 AM
To: Vogtle PEmails
Subject: SNC Response to NRC Comment on UIN for ITAAC Index No. 872

Below is SNC's response to NRC comment on the UIN for ITAAC Index No. 872 (ADAMS Accession No. ML18151B054).

From: Stacy, Kara M. [mailto:KMSTACY@southernco.com]
Sent: Tuesday, May 29, 2018 12:24 PM
To: Hoellman, Jordan <Jordan.Hoellman2@nrc.gov>
Cc: Nist, Lauren <lauren.nist@nrc.gov>; Petrak, Tom G. <TGPETRAK@southernco.com>
Subject: [External_Sender] RE: NRC Comment on UIN for ITAAC Index No. 872

Thank you Jordan for providing the FEMA memo.

SNC agrees with the Staff's suggestion below regarding the addition of the FEMA 5/15/15 memo as a UIN reference as well as revising the sentence in the UIN body. Since the ICN for 872 will be submitted close to 103g, we are currently revising the UIN and will be resubmitting it shortly.

Kara

From: Hoellman, Jordan [mailto:Jordan.Hoellman2@nrc.gov]
Sent: Monday, May 21, 2018 10:52 AM
To: Stacy, Kara M. <KMSTACY@southernco.com>
Cc: Kent, Lauren <Lauren.Kent@nrc.gov>
Subject: NRC Comment on UIN for ITAAC Index No. 872

Hi Kara – Please see the comment below regarding the UIN for ITAAC Index No. 872. Please let us know if you have any questions.

Thank you,
Jordan

Comment on UIN for ITAAC Index # 872

In the first paragraph (last sentence) of the ITAAC Completion Description section of Notice of Uncompleted ITAAC Letter No. ND-18-0637 (May 11, 2018), for ITAAC No. E.3.9.08.01.03 (Index No. 872), SNC states: "Offsite deficiencies as used in this ITAAC are considered to be Level 1 Findings, Level 2 Findings, and Plan Issues as defined in FEMA P-1028, Federal Emergency Management Agency (FEMA) Radiological Emergency Preparedness Program (Reference 1)."

In addition to the reference to FEMA P-1028 (i.e., FEMA P-1028, Program Manual – Radiological Emergency Preparedness, January 2016), the UIN should also reference FEMA's May 15, 2015, Memorandum from Andrew Mitchell (Director, Technological Hazards Division (THD)), to Radiological Emergency Preparedness Program (REPP) Staff, Regional Assistance Committee (RAC) Chairs, and Federal Preparedness Coordinators (FPCs); Subject: New Terms to Classify REPP Exercise-Related Observations and Issues. (See ADAMS Accession No. ML18138A258). The reference to this FEMA memorandum is necessary because it provides the direct connection between a Level 1 Finding and a Deficiency classification ("offsite deficiencies" is the term used in ITAAC No. E.3.9.08.01.03, Index No. 872, Acceptance Criterion 8.1.3).

FEMA's May 15, 2015, memorandum specifically states (in part) that "Level 1 Findings will have the same requirements as the current Deficiency classification, while Level 2 Findings and Plan Issues will be afforded additional HSEEP-compliant avenues for resolution." Given this direct correlation between Level 1 Findings and Deficiencies, as well as the definition of Level 1 Findings (in both the FEMA memo and P-1028), the correlation of deficiencies with the new FEMA classifications (indicated above) should be limited to Level 1 Findings only. This is due to the importance of FEMA deficiencies (now Level 1 Findings), with regard to the protection of the health and safety of the public living in the vicinity of a nuclear power plant.

A suggested revision to SNC's letter (quoted sentence above) is: "Offsite deficiencies as used in this ITAAC are considered to be Level 1 Findings, as defined in FEMA's January 2016 Program Manual – Radiological Emergency Preparedness (FEMA P-1028), and as addressed in FEMA's May 15, 2015, Memorandum, entitled "New Terms to Classify REPP Exercise-Related Observations and Issues."

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"Vogtle PEmails" <Vogtle.PEmails@nrc.gov>
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