



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

June 29, 2018

MEMORANDUM TO: Jennifer Dixon-Herrity, Chief  
Licensing Branch 4  
Division of Licensing, Siting, and  
Environmental Analysis  
Office of New Reactors

FROM: Jordan Hoellman, Project Manager */RA/*  
Licensing Branch 4  
Division of Licensing, Siting, and  
Environmental Analysis  
Office of New Reactors

SUBJECT: SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR  
OPERATING COMPANY ON MAY 31, 2018

The U.S. Nuclear Regulatory Commission (NRC) staff held a Category 1 public meeting with Southern Nuclear Operating Company (SNC) on May 31, 2018. The purpose of the meeting was to discuss issues associated with the safety review of licensing actions for SNC's Vogtle Electric Generating Plant (VEGP) Units 3 and 4.

The meeting notice can be found in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML18110A128. The meeting notice is also posted on the NRC public website. Enclosures 1 and 2 are the meeting agenda and attendance list for the meeting, respectively. The other documents referenced during the discussion can be found at the ADAMS Accession Nos. given below:

- Draft Request for Additional Information (RAI) Responses for License Amendment Request (LAR) 17-037, Changes to the Tier 2\* Departure Evaluation Process – ML18029A243
- Draft LAR 18-018, Changes to Construction Fitness-For-Duty (FFD) Commitments – ML18149A564
- Draft RAI No. 2 for LAR 17-024, Technical Specification (TS) Updates for Reactivity Control and Miscellaneous Changes – ML18149A371
- Draft RAI No. 3 for LAR 17-024 – ML18149A376
- Transmittal of Proprietary Presentation Slides for NRC Public Meeting on May 31, 2018, Update on Air Baffle Program Discussion – ML18170A305

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Summary of Meeting:

On May 31, 2018, staff from the NRC conducted a public meeting with representatives from SNC to discuss issues associated with the safety review of licensing actions for SNC's VEGP Units 3 and 4. Specifically, the meeting discussed (1) SNC's draft RAI responses regarding LAR 17-037, (2) SNC's draft LAR 18-018, (3) draft RAIs regarding LAR 17-024, and (4) an update on SNC's air baffle removal program.

The first topic discussed was SNC's LAR 17-037. The staff discussed three aspects:

1. Code Compliance. The staff made general remarks about how the future code alternatives should be handled in light of potential approval of LAR 17-037. The staff does not object to making the reference to the code material Tier 2 from Tier 2\*, but we want to emphasize that if SNC intends to deviate from American Society of Mechanical Engineers (ASME) Section III code requirements, then it will need to follow the process established in Title 10 *Code of Federal Regulations* (10 CFR) 50.55a for alternatives and relief requests, and not apply the 50.59 like process. The language in the supplemental RAI response related to the example using the words "adverse" raises a concern. In the instance used, this would be associated with the B31.1 Code, which does not fall under the purview of Title 10 CFR 50.55a. In this case, while using the 50.59-like process to deviate may be acceptable, this approach would not be acceptable for ASME Section III, where the 10 CFR 50.55a regulations would apply.
2. RAI 17-037-7 Draft Response. The staff provided feedback on SNC's May 22, 2018, draft response to RAI 17-037-7. In response, SNC indicated it planned to revise and resend a draft response to the staff that would address the following items:
  - How SNC's application of guidance regarding a "material change" under Criteria 2 and 3 would ensure information with safety significance commensurate with Tier 1 is not modified without prior NRC approval.
  - An explanation of the basis for how the guidance for Criteria 1, 2, and 3 achieves consistency.
  - How SNC determines "safety significance" as described in the LAR, including how it was determined that changes to a set of Tier 2\* information would not have safety significance commensurate with a change.
  - How the LAR conforms to or deviates with justification from Commission-approved positions in SECY papers, including SECYs 90-241, 90-377, and 95-023. SNC was advised that a publicly-available ADAMS package providing design certification regulatory history documents (ADAMS Accession No. ML003761550) would be a useful reference.
  - How it was determined that unknown future changes to a set of Tier 2\* information do not have safety significance commensurate with a change to Tier 1 without knowing what the future changes will be.

SNC also advised that (1) the analysis identified as underlying the LAR was not a formal analysis that is auditable, and (2) the draft response information for RAI 17-037-7 represents a clarification of and not a revision to the original LAR.

A representative of the Nuclear Energy Institute acknowledged the relationship between the proposed LAR and ongoing efforts regarding the Tier 1 "First Principles," noting that that effort has effects beyond the scope of this LAR.

3. RAI 17-037-5 (human factors engineering) Draft Response. The staff provided feedback on SNC's May 22, 2018, draft response to RAI 17-037-5. In response, SNC indicated it planned to revise and resend a draft response to NRC that would clarify the bullet referring to "final safety evaluation report" referred to all applicable safety evaluation reports, including those for the AP1000 DCD and Vogtle ESP and COLs, and any applicable LARs.

Additionally, the staff indicated that it may have further feedback on other aspects of SNC's May 22, 2018, draft response.

The second topic discussed was SNC's draft LAR 18-018. SNC provided an overview of the draft LAR, which proposes to take an exception from its current commitment to Regulatory Guide (RG) 5.84 to modify Nuclear Energy Institute (NEI) 06-06 guidance to allow construction workers temporary access authorization, pending completion of all pre-access FFD requirements. SNC noted that the temporary access authorization would only allow work on non-safety- and security-related structures, systems, and components. The staff, noting that because pre-access testing is the method for achieving assurance that workers are trustworthy, reliable, and fit-for-duty, provided comments and asked clarifying questions related to SNC's plan to mitigate the reduction in commitment proposed by the LAR. SNC noted that they understood the staff's comments and questions and stated that they would revise the LAR, as necessary, to address the comments and questions. The staff stated that they would perform its detailed review once the LAR is formally submitted.

The third topic discussed was draft RAIs for LAR 17-024. The staff discussed the two draft RAIs and asked SNC if they needed any additional clarification about what information was requested. SNC provided comments and asked clarification questions regarding the draft RAIs. The staff agreed that the draft RAI No. 3, Question 3 could be revised to include similar language from draft RAI No. 2, Question 3. The revised draft RAI No. 3 can be found at ADAMS Accession No. ML18151B056. Both the staff and SNC agreed that additional discussion regarding LAR 17-024 would be needed at a future public meeting.

The fourth topic discussed was SNC's air baffle removal program. SNC provided an update of the air baffle removal program testing with respect to development of phenomenon identification and ranking tables (PIRT) and scaling analysis.

At the end of each topic discussed and before closing the open portion of the meeting, there was an opportunity for the public to provide comments and ask questions. All comments and questions from members of the public were addressed before ending the open portion of the meeting.

In the closed portion of the meeting, the proprietary details, including testing and PIRT results, of SNC's air baffle removal program were discussed.

Docket Nos.: 052-025  
052-026

Enclosure:  
As stated

cc w/encls: See next page

SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR OPERATING COMPANY  
ON MAY 31, 2018 DATED: JUNE 29, 2018

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ADAMS Accession No.: ML18173A250

\*via e-mail

NRC-001

OFFICE	PM: DLSE/LB4	LA: DLSE/LB4	BC: DLSE/LB4	PM: DLSE/LB4
NAME	JHoellman (c)	RButler (c)	JDixon-Herrity (CPatel for)	JHoellman (s)
DATE	6/29/18	6/28/18	6/29/18	6/29/18

**OFFICIAL RECORD COPY**

**AGENDA FOR PUBLIC MEETING  
U.S. NUCLEAR REGULATORY COMMISSION (NRC)  
Thursday, May 31, 2018  
9:00 a.m. – 2:30 p.m.**

**PURPOSE:** To discuss issues associated with the safety review of licensing actions for Southern Nuclear Operating Company's (SNC) Vogtle Electric Generating Plant (VEGP) Units 3 and 4.

**OPEN**

<u>Time</u>	<u>Topic</u>	<u>Led By</u>
9:00 a.m.	Opening Remarks	NRC
9:05 a.m.	Discussion of draft Request for Additional Information (RAI) Responses for License Amendment Request (LAR) 17-037	NRC/SNC
9:45 a.m.	Opportunity for Public Comment	PUBLIC/NRC
9:45 a.m.	Discussion of draft LAR 18-018	NRC/SNC
10:45 a.m.	Opportunity for Public Comment	PUBLIC/NRC
10:45 a.m.	Discussion of draft RAIs for LAR 17-024	NRC/SNC/Westinghouse
11:45 a.m.	Opportunity for Public Comment	PUBLIC/NRC
11:45 a.m.	Discussion of public portion of Air Baffle Program	NRC/SNC
12:00 p.m.	Opportunity for Public Comment	PUBLIC/NRC
12:00 p.m.	BREAK	

**CLOSED**

1:00 p.m.	Discussion of Proprietary-related details regarding Air Baffle Program	NRC/SNC/Westinghouse
2:30 p.m.	Adjourn	

**PUBLIC MEETING**  
**U.S. NUCLEAR REGULATORY COMMISSION**  
**Thursday, May 31, 2018**  
**9:00 a.m. – 2:30 p.m.**

**List of Attendees**

Name	Organization
<b>Representing the Nuclear Regulatory Commission</b>	
Jordan Hoellman	NRO/DLSE/LB4
Jennifer Dixon-Herrity	NRO/DLSE/LB4
Don Habib	NRO/DLSE/LB4
Billy Gleaves	NRO/DLSE/LB4
Chandu Patel	NRO/DLSE/LB4
Tim Lupold	NRO/DEI/MEB
Joe Williams	NRO/DSRA/ARPB
John Segala	NRO/DSRA/ARPB
Brian Green	NRO/DCIP/HOIB
Pravin Patel	NRO/DEI/SEB
Paul Harris	NSIR/DPCP/FCTSB
Brian Zaleski	NSIR/DPCP/FCTSB
Silas Kennedy	NSIR/DPCP/FCTSB
Don Palmrose	NRO/DSRA/SRSB
Tarico Sweat *	NRR/DSS/STSB
Bill Roggenbrodt	NRO/DEI/ICE
John Frost *	NSIR/DPCP/RSB
Boyce Travis	NRO/DSRA/SCVB
Diane Jackson	NRO/DSRA/SCVB
<b>Representing Industry</b>	
Jason Redd *	Southern Nuclear Operating Company (SNC)
Tom Hicks *	SNC
Amy Aughtman *	SNC
Wes Sparkman *	SNC
Neil Haggerty *	SNC
Ryan Henderson	SNC
Duane Brock *	SNC
Mark Wilson *	SNC
Dan Williamson *	SNC
Brad Chamberlain	SNC
Lee Doby *	SNC

Shayan Sinha *	Westinghouse Electric Company (Westinghouse)
Jason Eisenhauer	Westinghouse
Mike Patterson	Westinghouse
Adana Stanish	Westinghouse
Pat Tilley *	Westinghouse
Steve Merkel *	Westinghouse
<b>Representing Public</b>	
Russ Bell *	Nuclear Energy Institute (NEI)

\* = participated via teleconference



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(Revised 03/13/2018)

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