

**AUG 29 2018**Docket Nos.: 52-025  
52-026

ND-18-0986

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555-0001

Vogtle Electric Generating Plant – Units 3 and 4  
Tenth Six-Month Status Report of the Implementation of the  
Requirements of the Commission Order with Regard to  
Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049)

## References:

1. NRC Order Number EA-12-049, *Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events*, dated March 12, 2012.
2. NRC Interim Staff Guidance JLD-ISG-2012-01, *Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events*, Revision 0, dated August 29, 2012.
3. NEI 12-06, *Diverse and Flexible Coping Strategies (FLEX) Implementation Guide*, Revision 0, dated August 2012.
4. SNC Letter ND-13-1702, *Vogtle Electric Generating Plant Units 3 and 4 Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)*, dated August 22, 2013.

## Ladies and Gentlemen:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an order (Reference 1) to Southern Nuclear Operating Company. Reference 1 was immediately effective and directed the Vogtle Electric Generating Plant - Units 3 and 4 (VEGP 3&4) to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 3 of Reference 1.

Reference 1 required submission of an Overall Integrated Plan within one year after issuance of the final NRC Interim Staff Guidance (Reference 2). Reference 2 endorses industry guidance document NEI 12-06, Revision 0 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the VEGP 3&4 Overall Integrated Plan.

Reference 1 requires submission of a status report at six-month intervals following submittal of the Overall Integrated Plan. Reference 3 provides direction regarding the content of the status reports and was followed in developing the enclosed report. The purpose of this letter is to provide the tenth six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The enclosed status report provides an update of milestone accomplishments since the last six-month update, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no new regulatory commitments. This letter has been reviewed and determined not to contain security-related information.

If you have any questions, please contact Mr. Dave Midlik at 706-848-6737.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 30th day of August 2018.

Respectfully submitted,

  
Michael J. Yox  
Vogtle 3&4 Regulatory Affairs Director  
Southern Nuclear Operating Company

MJY/DWM/amw

Enclosure: Tenth Six-Month Status Report of the Implementation of the Requirements of the Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049)

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**Southern Nuclear Operating Company**

**ND-18-0986**

**Enclosure**

**Vogtle Electric Generating Plant Units 3 and 4**

**Tenth Six-Month Status Report of the Implementation of  
the Requirements of the Commission Order with Regard to  
Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049)**

(This enclosure consists of 4 pages including this cover page)

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Enclosure

Tenth Six-Month Status Report of the Implementation of the Requirements of the Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049)

## **1 Introduction**

Vogtle Electric Generating Plant - Units 3 and 4 developed an Overall Integrated Plan (Reference 1 in Section 8), documenting the diverse and flexible strategies (FLEX), in response to Nuclear Regulatory Commission Order EA-12-049 (Reference 2). This status report provides an update of milestone accomplishments since the last six-month update, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

## **2 Milestone Accomplishments**

In addition to the submittal of status reports, the following milestone(s) directly related to FLEX implementation have been completed since the last six-month update (Reference 3), and are current as of June 30, 2018:

- None

## **3 Milestone Schedule Status**

The following provides a milestone schedule update with the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed. The table contains new and revised milestone activities, designated in *Italics*.

The revised milestone target completion dates do not impact the Order implementation date.

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Enclosure

Tenth Six-Month Status Report of the Implementation of the Requirements of the Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049)

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Submit 60 Day Status Report	Oct 2012	Complete	N/A
Submit Overall Integrated Plan (OIP)	Aug 2013	Complete	N/A
Submit 6 Month Status Report	Feb 2014	Complete	N/A
Submit 6 Month Status Report	Aug 2014	Complete	N/A
Submit 6 Month Status Report	Feb 2015	Complete	N/A
Submit 6 Month Status Report	Aug 2015	Complete	N/A
Submit 6 Month Status Report	Feb 2016	Complete	N/A
Submit 6 Month Status Report	Aug 2016	Complete	N/A
Submit 6 Month Status Report	Feb 2017	Complete	N/A
Submit 6 Month Status Report	Aug 2017	Complete	N/A
Submit 6 Month Status Report	Feb 2018	Complete	N/A
Submit 6 Month Status Report	Aug 2018	Complete	N/A
Submit 6 Month Status Report <sup>1</sup>	Feb 2019	Not Started	N/A
Submit 6 Month Status Report	Aug 2019	Not Started	N/A
<i>Develop FLEX training</i>	<i>Aug 2019</i>	<i>In progress</i>	<i>N/A</i>
Staffing Analysis Completed	Oct 2019	Not Started	N/A
Ensure Operational Procedures include necessary information	Nov 2019	In progress	N/A
Complete Response Plan with NSRC (storage plan and procedural guidance for strategy/maintenance)	Nov 2019	In progress	N/A
Initiate Phase 3 Equipment Procurement	Dec 2019	Not Started	
Submit 6 Month Status Report	Feb 2020	Not Started	N/A
Demonstration for Unit 3	Apr 2020	Not Started	N/A
Completion Report for Unit 3	Dec 2020	Not Started	Jun 2020
NSRC Operational for Vogtle 3&4	Aug 2020	Not Started	N/A
Training Complete for Phase 3 to include connection and use of redundant offsite equipment for Ancillary Equipment.	Aug 2020	Not Started	Feb 2020
Submit 6 Month Status Report	Aug 2020	Not Started	N/A
Submit 6 Month Status Report	Feb 2021	Not Started	N/A
Demonstration for Unit 4	Apr 2021	Not Started	N/A
Submit Completion Report for Unit 4 and Final Integrated Plan (FIP)	Jun 2021	Not Started	N/A

Unit 3 - Full compliance prior to Fuel Load for Unit 3  
 Unit 4 - Full compliance prior to Fuel Load for Unit 4

<sup>1</sup>Updated plant-specific OIP anticipated to be submitted with Feb 2019 6-month update.

**4 Changes to Compliance Method**

There are no changes to the compliance method as documented in Reference 1.

**5 Need for Relief/Relaxation and Basis for the Relief/Relaxation**

Vogtle Electric Generating Plant - Units 3 and 4 expects to comply with the order implementation date and no relief/relaxation is required at this time.

**6 Open Items from Overall Integrated Plan and Draft Safety Evaluation**

The following tables provide a summary of the open items documented in the Overall Integrated Plan or the Draft Safety Evaluation (SE) and the status of each item.

Overall Integrated Plan Open Item	Status
N/A	N/A

Draft Safety Evaluation Open Item	Status
Draft Safety Evaluation not received	N/A

**7 Potential Draft Safety Evaluation Impacts**

A Draft Safety Evaluation has not been received.

**8 References**

The following references support the updates to the Overall Integrated Plan described in this enclosure.

1. SNC Letter ND-13-1702, *Vogtle Electric Generating Plant Units 3 and 4 Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)*, dated August 22, 2013.
2. NRC Order Number EA-12-049, *Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events*, dated March 12, 2012.
3. SNC letter ND-18-0154, *Vogtle Electric Generating Plant – Units 3 and 4 Ninth Six-Month Status Report of the Implementation of the Requirements of the Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049)*, dated February 26, 2018.