



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

October 24, 2018

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

FROM: Donald Habib, 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 SEPTEMBER 6, 2018

The U.S. Nuclear Regulatory Commission (NRC) staff held a Category 1 public meeting with Southern Nuclear Operating Company (SNC) on September 6, 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. ML18229A012. 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:

- SNC draft Exemption Request and draft NRC Form 398 for Transferring Operator Pass Letters from V.C. Summer (VCS) Units 2 and 3 to VEGP Units 3 and 4 – ML18236A277
- Omission of Text from Proposed License Condition 2D.(13)(a) in SNC Letter ND-18-1006, Enclosure 3U (License Amendment Request (LAR) 17-037, Changes to the Tier 2* Departure Evaluation Process) – ML18267A215
- LAR 17-037 Proposed Change to License Condition Criteria No. 1 – ML18243A032
- LAR 17-037 Proposed Changes to License Condition – ML18248A162

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Summary of Meeting:

On September 6, 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) pre-submittal information regarding SNC's draft Exemption Request and draft NRC Form 398 for transferring Operator Pass letters from VCS to VEGP and (2) revised License Condition language for LAR 17-037.

The first topic discussed was pre-submittal information regarding SNC's draft Exemption Request and draft NRC Form 398 for transferring Operator Pass letters from VCS to VEGP. SNC discussed the pre-submittal documents. The staff provided comments on the draft request for exemption from operator written examination and operating test. The staff noted that the draft NRC Form 398 identifies the license application is for VEGP Unit 3 and asked SNC to ensure that the exemption request is clear that the request is associated with a license application to operate VEGP Unit 3, not both VEGP Unit 3 and VEGP Unit 4. On Page 2/11 of Enclosure 1, under Section 2.0, "Detailed Description," the staff noted that there is a discussion about enrolling VCS candidates in the continuing training program for VEGP Units 3 and 4. The staff asked SNC to state, in the exemption request, whether the VCS candidates are current in the continuing training program and whether they have been "brought up to speed" in the continuing training program with the VEGP Unit 3 applicants. Additionally, on Page 2/11 of Enclosure 1, under Section 2.0, the staff noted that the last sentence on the page says, "...the examinations did not test systems that are unique to one facility." The staff asked SNC to explain, in the exemption request, how SNC determined that the exams did not test systems that are unique to one facility.

On Page 3/11 of Enclosure 1, the staff noted that the first paragraph includes a statement that says, "...no gaps in the material tested have been identified." The staff asked SNC to explain, in the exemption request, how SNC determined that there were no gaps in the material tested. On Page 7/11 of Enclosure 1, the staff noted that the third bullet includes a statement that says, "Site-specific tasks were not trained or evaluated for license purposes." The staff asked SNC to explain, in the exemption request, how SNC determined that site-specific tasks were not trained or evaluated for license purposes. On Page 7/11 of Enclosure 1, the staff noted that the paragraph under the third bullet starts with a sentence that says, "A gap analysis was conducted..." The staff asked SNC to describe, in the exemption request, what was analyzed. On Page 7/11 of Enclosure 1, the staff noted that a gap analysis is also discussed in the paragraph that starts with, "An evaluation of the simulators used for the tests revealed no testable variances." The staff asked SNC to describe, in the exemption request, what was analyzed. On Page 7/11 of Enclosure 1, the staff noted that there is a statement that says, "Differences noted were limited to fleet and site-specific conduct of operations procedures." Also on Page 7/11, emergency plan implementing procedures (EIPs) are identified as a "site-specific gap in these candidates' training and evaluation." Identification of EIPs as a site-specific difference seems to the staff to contradict the other statement. The staff asked SNC to review and clarify the exemption request, as necessary.

Additionally, the staff asked SNC to explain whether there were any site-specific differences in plant systems, and whether these differences have been evaluated. On NRC Form 398, the staff asked SNC to specify the number of hours of pre-operational testing that will be performed from the main control room and the types of plant systems that will be tested.

SNC noted that they understood the staff's comments and would address them, as necessary, before they formally submit the request for exemption.

The second topic discussed was revised License Condition language for LAR 17-037.

Prior to the meeting, SNC and the staff had email communications regarding four proposed changes to the proposed license condition 2.D.(13) (ADAMS Accession No. ML18267A215). The four proposed changes were dispositioned as follows:

- For two of the items, edits to paragraphs (a) and (b), SNC advised that they agreed with the edits and no discussion was necessary.
- For one of the items, edits to Criterion No. 1, the staff clarified that some aspects of a code or standard, such as construction provisions of the code, might not be considered a design methodology or construction materials, and the proposed wording change was intended to clarify that any deviation from a code or standard would meet the criterion, and that this was consistent with SNC's previously proposed guidance for Criterion No. 1. SNC agreed to the staff-proposed edits to Criterion No. 1.
- For the last item, which involved the staff's desire to consistently refer to the plant-specific design control document (DCD) and the Updated Final Safety Analysis Report (UFSAR) throughout the proposed license condition, SNC responded that the references to the UFSAR were appropriate since the references applied to specific sections of the UFSAR. The references to the plant-specific DCD were appropriate because those references reflected the same regulatory language as that appearing in Section VIII of 10 CFR Part 52, Appendix D. The staff agreed that no change was necessary.

Following this discussion, SNC advised that it would submit under a future letter the revised license condition proposal reflecting the changes agreed in the public meeting.

At the end of each topic discussed, there was an opportunity for the public to provide comments and ask questions. There were no questions or comments from members of the public.

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 SEPTEMBER 6, 2018 DATED: OCTOBER 24, 2018

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ADAMS Accession No.: ML18268A123

*via e-mail

NRC-001

OFFICE	PM: DLSE/LB4	LA: DLSE/LB4	BC: DLSE/LB4	PM: DLSE/LB4
NAME	DHabib (c)	RButler (c)	JDixon-Herrity (c)	DHabib (s)
DATE	10/18/18	10/10/18	10/24/18	10/24/18

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**AGENDA FOR PUBLIC MEETING
U.S. NUCLEAR REGULATORY COMMISSION (NRC)
Thursday, September 6, 2018
9:00 a.m. – 10:00 a.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 pre-submittal information regarding SNC's draft Exemption Request and draft NRC Form 398 for transferring Operator Pass letters from Virgil C. Summer (VCS) to VEGP	NRC/SNC
9:30 a.m.	Opportunity for Public Comment	PUBLIC/NRC
9:35 a.m.	Discussion of revised License Condition language for License Amendment Request (LAR) 17-037	NRC/SNC
9:55 a.m.	Opportunity for Public Comment	PUBLIC/NRC
10:00 a.m.	Adjourn	

PUBLIC MEETING
U.S. NUCLEAR REGULATORY COMMISSION
Thursday, September 6, 2018
9:00 a.m. – 10:00 a.m.

List of Attendees

Name	Organization
Representing the Nuclear Regulatory Commission	
Don Habib	NRO/DLSE/LB4
Chandu Patel	NRO/DLSE/LB4
Jennifer Dixon-Herrity	NRO/DLSE/LB4
Pravin Patel	NRO/DEI/SEB
Vaughn Thomas	NRO/DEI/SEB
Nick Hansing	NRO/DEI/MEB
Jim Gaslevic	NRO/DCIP/HOIB
Lauren Nist*	NRO/DCIP/HOIB
Gene Guthrie*	R-II/DRS/OB2
Bruno Caballero*	R-II/DRS/OB2
Tony Ponko*	R-II/DCO/CIB1
Representing Industry	
Kelli Roberts*	Southern Nuclear Operating Company
Amanda Pugh*	
Travis Mays*	
Tom Arnette*	
Jonathan Hartman*	
Pamela Fergen*	
Neil Haggerty*	
Wes Sparkman*	
Jason Redd*	
Representing Public	
N/A	

* = participated via teleconference

Enclosure 2

Vogtle Units 3 & 4 Mailing List
cc:

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(Revised 08/16/2018)

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