

Vogle PEmails

From: Hoellman, Jordan
Sent: Monday, December 3, 2018 12:00 PM
To: Roberts, Kelli Anne; Patel, Chandu
Cc: Nist, Lauren; Guthrie, Eugene; Fergen, Pamela S.; Pugh, Amanda Louise; Agee, Stephanie Y.; Vogtle PEmails
Subject: Staff Comments RE: Draft B Exemption Request for Transferring Operator Pass Letters from VCS to VEGP Docket
Attachments: Staff Comments on Draft B 11_30_2018.docx

Hi Kelli,

Please see the attached staff comments regarding SNC's draft B exemption request and block 25 comments for transferring operator pass letters from VC Summer to Vogtle (ADAMS Accession No. ML18332A493). These comments will be used to support the discussions at the December 6, 2018, public meeting.

Please note that although we are providing feedback on these drafts, when the request is officially submitted, there may be other questions that need to be addressed in additional public meeting discussions or through the request for additional information (RAI) process.

Thank you,
Jordan

Jordan Hoellman
Project Manager
NRO / DLSE / LB4
U.S. Nuclear Regulatory Commission
office: OWFN 08-C18
phone: (301) 415-5481
email: Jordan.Hoellman2@nrc.gov

From: Roberts, Kelli Anne [mailto:KROBERTS@southernco.com]
Sent: Friday, November 09, 2018 11:34 AM
To: Hoellman, Jordan <Jordan.Hoellman2@nrc.gov>; Patel, Chandu <Chandu.Patel@nrc.gov>
Cc: Nist, Lauren <lauren.nist@nrc.gov>; Guthrie, Eugene <Eugene.Guthrie@nrc.gov>; Fergen, Pamela S. <X2PSFERG@SOUTHERNCO.COM>; Pugh, Amanda Louise <ALPUGH@southernco.com>; Agee, Stephanie Y. <SYAGEE@southernco.com>
Subject: [External_Sender] Draft B Exemption Request for Transferring Operator Pass Letters from VCS to VEGP Docket

Jordan,

Following the 9/6 pre-submittal meeting, the attached draft B exemption request and draft B Block 25 Comments for NRC Form 398 have been prepared. No changes were made to the draft NRC Form 398 provided in support of the 9/6 pre-submittal meeting, but it is also attached for completeness. We would like to discuss draft B with staff during the public call on December 6, if possible. Please let me know if staff can support the requested 12/6 pre-submittal meeting for draft B. The documents have placeholders for personally identifiable information (PII), but all PII has been removed for the purposes of supporting the pre-submittal meeting. Thus, the entirety of the attached documents can be made available to the public; final submittal will have withheld PII.

I have also attached a word file of draft B with tracked changes as a courtesy to staff to make it easier to see what changes have been made.

Please let me know if you have questions.

Thanks,

Kelli Roberts | Southern Nuclear Operating Company

Vogtle 3&4 Licensing Supervisor

Hearing Identifier: Vogtle_COL_Docs_Public
Email Number: 392

Mail Envelope Properties (SN6PR0901MB23669B235EBE1BA862850BD8D5AE0)

Subject: Staff Comments RE: Draft B Exemption Request for Transferring Operator Pass
Letters from VCS to VEGP Docket
Sent Date: 12/3/2018 12:00:28 PM
Received Date: 12/3/2018 12:00:37 PM
From: Hoellman, Jordan

Created By: Jordan.Hoellman2@nrc.gov

Recipients:

"Nist, Lauren" <lauren.nist@nrc.gov>
Tracking Status: None
"Guthrie, Eugene" <Eugene.Guthrie@nrc.gov>
Tracking Status: None
"Fergen, Pamela S." <X2PSFERG@SOUTHERNCO.COM>
Tracking Status: None
"Pugh, Amanda Louise" <ALPUGH@southernco.com>
Tracking Status: None
"Agee, Stephanie Y." <SYAGEE@southernco.com>
Tracking Status: None
"Vogtle PEmails" <Vogtle.PEmails@nrc.gov>
Tracking Status: None
"Roberts, Kelli Anne" <KROBERTS@southernco.com>
Tracking Status: None
"Patel, Chandu" <Chandu.Patel@nrc.gov>
Tracking Status: None

Post Office: SN6PR0901MB2366.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	2538	12/3/2018 12:00:37 PM
Staff Comments on Draft B 11_30_2018.docx		32339

Options

Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

1. The scope of the exemption request should also include 55.31(a)(3), which requires each applicant for an operators' license to submit a written request from an authorized representative of the facility licensee by which the applicant will be employed that the written examination and operating test be administered to the applicant.
2. A. Please explain whether "common" means "same" (e.g., in Enclosure 1 of Draft B of letter ND-18-1126, Page 7/12 where it states, "A review of testable knowledge and abilities for site-specific systems was conducted; the subject of all catalog items was traced back to lesson plans which were developed from a consistent set of AP1000 materials. Therefore, it was determined that all testable knowledge and abilities were included in common AP1000 systems training and/or procedure training."). If it does not mean "same," please describe the differences between the training materials and procedures.
B. Also, Encl 1, Page 7/12 says, "A review of testable knowledge and abilities for site-specific systems was conducted; the subject of all catalog items was traced back to lesson plans which were developed from a consistent set of AP1000 materials. Therefore, it was determined that all testable knowledge and abilities were included in common AP1000 systems training and/or procedure training." Please explain whether SNC addressed any gaps in knowledge of the VEGP 3 site-specific systems.
3. Please clarify whether the procedure exam discussed in Encl 1, Page 8/12 also tested knowledge of the emergency plan implementing procedures.
4. Encl 1, Page 8/12, says procedure gap training was conducted by self-study of VEGP 3 conduct of operations procedures. Please describe the nature of the subjects that were included in the conduct of operations procedures and training.
5. Encl 1, page 7/12 says that SNC looked for "testable" differences between the task lists. Please explain whether the task list gap analysis was sufficient to also identify any significant differences in the technical specifications and operational characteristics between the two sites.
6. Encl 1, Page 7/12, says SNC did a line by line comparison of tasks, all tasks were the same, but procedures varied. Please clarify if the procedures were those procedures cited in the task statements.
7. Encl 1, Page 10/12, please explain in the request how granting the exemption would "avoid duplication of efforts and ensure trained personnel are available to support activities at VEGP Unit 3" and "conserve NRC and licensee resources."
8. Encl 1, Page 10/12, says, "Successful completion of the licensed examination and test indicated licensed operator candidates have learned to operate an AP1000 facility safely and competently." Successful completion of a licensed operator exam indicates candidates have learned to safely operate a particular facility; in this case, the facility is VC Summer Unit 2. The request should address how completion of that exam, plus any corrective actions SNC has taken to address knowledge gaps, demonstrate the candidates have learned to operate VEGP 3 safely and competently.