



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

January 4, 2019

Ms. Cheryl A. Gayheart
Regulatory Affairs Director
Southern Nuclear Operating Co., Inc.
3535 Colonnade Parkway
Birmingham, AL 35243

SUBJECT: EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2, JOSEPH M. FARLEY
NUCLEAR PLANT, UNITS 1 AND 2, AND VOGTLE ELECTRIC GENERATING
PLANT, UNITS 1 AND 2 – REQUEST FOR ADDITIONAL INFORMATION
RE: REVISE TECHNICAL SPECIFICATION 5.2.2.g AND UPDATE
EMERGENCY PLAN MINIMUM ON-SHIFT STAFF TABLES
(EPID L-2018-LLA-0233)

Dear Ms. Gayheart:

By letter dated August 9, 2018, Southern Nuclear Operating Company (SNC) submitted a license amendment request to revise Technical Specification 5.2.2.g, "Unit Staff," for the Edwin I. Hatch Nuclear Plant (Hatch), Units 1 and 2, the Joseph M. Farley Nuclear Plant, Units 1 and 2, (Farley), and the Vogtle Electric Generating Plant, Units 1 and 2. Additionally, SNC requested the approval of a revision to the minimum on-shift staffing tables in annexes associated with the SNC Standard Emergency Plan (SEP) and an accompanying editorial change in the SEP for Hatch and Farley. The proposed changes would eliminate the dedicated Shift Technical Advisor from the on-shift emergency response organization.

The U.S. Nuclear Regulatory Commission (NRC) staff has determined that additional information is needed for the NRC to complete its review, in addition to the information requested in a December 9, 2018 letter to SNC. During a call on January 3, 2018, Mr. Joyce of your staff agreed that SNC will respond within 30 days of the date of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael D. Orenak", is written over a horizontal line.

Michael D. Orenak, Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-321, 50-366, 30-348,
50-364, 50-424 and 50-425

Enclosure:
Request for Additional Information

cc: Listserv

REQUEST FOR ADDITIONAL INFORMATION
REGARDING CHANGES TO TECHNICAL SPECIFICATION 5.2.2.G AND
UPDATE EMERGENCY PLAN MINIMUM ON-SHIFT STAFF TABLES
SOUTHERN NUCLEAR OPERATING COMPANY, INC.
EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2
JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2
VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2
SOUTHERN NUCLEAR OPERATING COMPANY
DOCKET NOS. 50-321, 50-366, 30-348, 50-364, 50-424 AND 50-425

By letter dated August 9, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18226A108), Southern Nuclear Operating Company (SNC) submitted a license amendment request (LAR) to revise Technical Specification (TS) 5.2.2.g, "Unit Staff," for the Edwin I. Hatch Nuclear Plant (Hatch), Units 1 and 2, the Joseph M. Farley Nuclear Plant, Units 1 and 2, (Farley), and the Vogtle Electric Generating Plant, Units 1 and 2 (Vogtle). Additionally, SNC requested the approval of a revision to the minimum on-shift staffing tables in annexes associated with the SNC Standard Emergency Plan (SEP) and an accompanying editorial change in the SEP for Hatch and Farley. The proposed changes would eliminate the dedicated Shift Technical Advisor (STA) from the on-shift emergency response organization.

By letter dated December 6, 2018 (ADAMS Accession No. ML18337A403), the U.S. Nuclear Regulatory Commission (NRC) requested additional information (RAI) from SNC regarding this LAR. In addition to the December 6, 2018 RAI, the NRC staff has determined that the following additional information is needed to complete its review.

RAI 2

The regulatory requirements and guidance regarding this LAR are as follows:

- Title 10 of the *Code of Federal Regulations* (CFR) 50.36, "Technical specifications," Section (c)(5) provides requirements for the content of the TSs in the category "Administrative Controls." These requirements include provisions related to organization and management to assure operation of the facility in a safe manner.
- 10 CFR 50.47(b)(2) states:

On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available and the

interfaces among various onsite response activities and offsite support and response activities are specified.

- 10 CFR 50.54(m)(2)(i) describes minimum licensed operator staffing requirements.
- NUREG-0737, Final Report, "Clarification of TMI Action Plan Requirements," November 1980 (ADAMS Accession No. ML051400209). Item I.A.1.1, "Shift Technical Advisor," discusses the provision of an on-shift STA to the shift supervisor.
- Revision 7 of NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition," Chapter 13, Section 13.1.2-13.1.3, "Operating Organization" (ADAMS Accession No. ML15007A296). This section provides guidance for the review of the operating organization of applicants, including the structure, functions, and responsibilities of the onsite organization established to safely operate and maintain the facility.
- Generic Letter (GL) 86-04, "Policy Statement on Engineering Expertise on Shift," dated February 13, 1986 (ADAMS Accession No. ML031150270), describes two options for meeting the current requirements for providing engineering expertise on shift and meeting licensed operator staffing requirements.

SNC proposes to revise TS 5.2.2.g for Hatch, Farley and Vogtle to eliminate a dedicated STA position at Farley and Hatch by allowing the STA functions to be combined with one or more of the required SRO positions. The Vogtle TS change aligns the facilities with equivalent wording. The proposed TS revision would also add Mode-specific requirements for the STA function (Modes 1, 2, 3, and 4 for Farley and Vogtle; Modes 1, 2 and 3 for Hatch) and specify that the same individual may provide advisory technical support for both units at the facility site.

The licensee also proposes to revise the minimum on-shift staffing Table 2.2.A in annexes associated with the SNC SEP and an accompanying editorial change in the SEP for Hatch and Farley. The proposed changes would revise the position "Shift Support Supervisor/Shift Technical Advisor (SRO/STA)" to "Shift Support Supervisor or other trained individual." The designation of a separate individual to perform the task of "Technical Support," associated with the revised position would be eliminated and replaced with a Note 2 in the table stating, "May be provided by shift personnel assigned other functions."

GL 86-04, "Policy Statement on Engineering Expertise on Shift," described two options for meeting the requirements for providing engineering expertise on shift. Option 1 allowed for the elimination of a separate STA position by allowing one of the required SRO positions to be combined with the STA position into a dual-role SRO/STA position. Option 2 allowed for continuation of an NRC-approved STA program. GL 86-04 noted that the Commission encourages licensees to use Option 1, the dual-role SRO/STA. Under SNC's proposed change, the STA function to provide technical expertise on shift may be fulfilled by either an STA-qualified individual in the shift command structure or a separate individual. The licensee proposes to implement Option 1 of the Commission Policy Statement on Engineering Expertise on Shift with the revision to TS 5.2.2.g.

GL 86-04 states, in part:

The Policy Statement offers the licensees two options for meeting the current requirements for providing engineering expertise on shift (NUREG-0737, Item I.A.1.1)...

NUREG-0737, Item I.A.1.1, references, and includes as Appendix C, the Institute of Nuclear Power Operations (INPO) document, "Nuclear Power Plant Shift Technical Advisor: Recommendations for Position Description, Qualifications, Education and Training," Rev. 0. Section 4, "Position Description," of the INPO document describes STA general duties and typical responsibilities that include the following:

- Maintain independence from normal plant operations as necessary to make objective evaluations of plant operations and to advise or assist plant supervision in correcting conditions that may compromise the safety of operations.
- During transients and accidents, compare existing critical parameters, (i.e. neutron power level; reactor coolant system level, pressure and temperature; containment pressure, temperature, humidity and radiation level; and plant radiation levels) with those predicted in the Plant Transient and Accident Analysis, to ascertain whether the plant is responding to the incident as predicted. Report any abnormalities to the Shift Supervisor immediately and provide assistance in formulating a plan for appropriate corrective action.

In addition, the INPO document states the following:

The STA is accountable for the following end results:

- (1) Contributes to maximizing safety of operations by independently observing plant status and advising shift supervision of conditions that could compromise plant safety.
- (2) Contributes to maximizing plant safety during transient or accident situations by independently assessing plant conditions and by providing the technical assistance necessary to mitigate the incident and minimize the effect on personnel, the environment, and plant equipment.

The proposed changes appear to allow for the combining of the Shift Manager position with the STA function post-event. In this scenario, the Shift Manager would simultaneously fulfill the role of Emergency Director while being responsible for the STA function.

Please clarify if the proposed LAR intends to allow the Shift Manager to simultaneously fulfill the role of Emergency Director while being responsible for the STA function, post-event. If so, please justify how the Shift Manager can effectively perform the duties of the Emergency Director while simultaneously fulfilling the general duties, typical responsibilities, and accountabilities associated with the STA function as described in Appendix C of NUREG-0737.

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ADAMS Accession No. ML18355A477

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| NAME | MOrenak | KGoldstein | CFong |
| DATE | 1/02/19 | 12/21/18 | 12/20/18 |
| OFFICE | NRR/DORL/LPL2-1/BC | DORL/LPL2-1/PM | |
| NAME | MMarkley | MOrenak | |
| DATE | 1/02/19 | 1/04/19 | |

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