



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

February 27, 2019

MEMORANDUM TO: Jennifer Dixon-Herrity, Chief
Licensing Branch 2
Division of Licensing, Siting, and
Environmental Analysis
Office of New Reactors

FROM: Jordan Hoellman, Project Manager */RA/*
Licensing Branch 2
Division of Licensing, Siting, and
Environmental Analysis
Office of New Reactors

SUBJECT: SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR
OPERATING COMPANY ON JANUARY 17, 2019

The U.S. Nuclear Regulatory Commission (NRC) staff held a Category 1 public meeting with Southern Nuclear Operating Company (SNC) on January 17, 2019. The purpose of the meeting was to discuss technical details related to License Amendment Requests (LARs) for Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Optimization 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. ML18352B044. 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:

- ITAAC Optimization Presentation – ML19015A074
- Draft Emergency Planning (EP) ITAAC Optimization LAR – ML19015A079

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Summary of Meeting:

On January 17, 2019, staff from the NRC conducted a public meeting with representatives from SNC to discuss LARs for ITAAC Optimization for SNC's VEGP Units 3 and 4. This meeting was a follow-up discussion to the public meeting held on December 13, 2018 (ADAMS Accession No. ML19016A372).

SNC discussed their proposed LARs for screening and deposition of ITAAC for VEGP Units 3 and 4 related to the following topics:

1. EP ITAAC
2. Security ITAAC
3. Functional Arrangement ITAAC
4. Structural Buildings ITAAC

Regarding EP ITAAC, SNC discussed that the proposed LAR scope addresses eleven specific EP ITAAC and proposes to remove redundant design and construction EP ITAAC that are bounded by the completion of other EP ITAAC, exercise and drill EP ITAAC that are bounded by existing regulatory evaluation requirements, and an administrative EP ITAAC that is bounded by an existing regulatory submittal requirement. Regarding the design and construction EP ITAAC and administrative EP ITAAC, the staff noted that they understand SNC's approach. Regarding the exercise and drill EP ITAAC, the staff noted that that the Atomic Energy Act of 1954, as amended (AEA), requires the NRC to, in part, identify within the combined license the ITAAC, including those applicable to EP, that, if met, are necessary and sufficient to provide reasonable assurance that the facility has been constructed and will be operated in conformity with the license, the AEA, and the Commission's rules and regulations. The staff discussed that because ITAAC are intended to provide reasonable assurance that the Commission's regulations are met, the technical justification for removing these ITAAC cannot rely solely on ITAAC being redundant to regulatory requirements. The staff discussed that they don't expect SNC to repeat exercises or drills that have already been conducted and demonstrate the capabilities of the facility. SNC stated that they understood the staff's comments.

Regarding security ITAAC, SNC discussed that the proposed LAR scope addresses twenty security ITAAC that have associated regulatory requirements and inspection guidance, which are detailed in the presentation. Similar to the exercise and drill EP ITAAC, the staff discussed that because ITAAC are intended to provide reasonable assurance that the Commission's regulations are met, the technical justification for removing these ITAAC cannot rely solely on ITAAC being redundant to regulatory requirements. The staff also noted that inspections do not substitute for ITAAC. SNC stated that they understood the staff's comments, and the staff and SNC agreed to have further discussions on this topic at future public meetings.

Regarding functional arrangement ITAAC, SNC discussed that the proposed LAR scope considers forty functional arrangement ITAAC and that the technical justification for removing the ITAAC may include multiple facets, as described in the example. SNC stated that the purpose of functional arrangement ITAAC is to verify and document that the as-built system components conform to the Tier 1 Design Description and that the physical arrangement of some systems are inherently shown via other ITAAC. The staff discussed the importance of functional arrangement ITAAC and that SNC's technical justification will need to demonstrate how other ITAAC satisfy the intent of functional arrangement ITAAC. SNC stated that they understood the staff's comments and would provide an example and discuss the logic at a future public meeting.

Regarding structural buildings ITAAC, SNC discussed that the ITAAC requirements for structural buildings have two purposes: structural and radiation protection. SNC discussed the proposed changes and indicated that a LAR schedule has not been developed yet. Regarding the proposed Note (15) added to Table 3.3-1 to allow reconciliation of thickness deviations in the report for nuclear island structures, the staff asked if SNC intends to apply a similar note to the annex and turbine building structures. SNC indicated that they intend to apply a similar note. The staff and SNC agreed to discuss this proposed LAR further at a future public meeting.

At the end of the meeting, 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 JANUARY 17, 2019 DATED: FEBRUARY 27, 2019

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ADAMS Accession No.: ML19043A971

*via e-mail

NRC-001

OFFICE	PM: DLSE/LB2	LA: DLSE/LB2	BC: DLSE/LB2	PM: DLSE/LB2
NAME	JHoellman (c)	RButler (c)	JDixon-Herrity (c)	JHoellman (s)
DATE	2/27/19	2/21/19	2/27/19	2/27/19

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**AGENDA FOR PUBLIC MEETING
U.S. NUCLEAR REGULATORY COMMISSION (NRC)
Thursday, January 17, 2019
9:00 a.m. – 11:00 a.m.**

PURPOSE: To discuss technical details related to License Amendment Requests (LARs) for Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Optimization for SNC's 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 technical details regarding LARs for ITAAC Optimization for VEGP Units 3 and 4 combined licenses	NRC/SNC
11:00 a.m.	Opportunity for Public Comment	PUBLIC/NRC
11:00 a.m.	Adjourn	

Enclosure 1

PUBLIC MEETING
U.S. NUCLEAR REGULATORY COMMISSION
Thursday, January 17, 2019
9:00 a.m. – 11:00 a.m.

List of Attendees

Name	Organization
Representing the Nuclear Regulatory Commission	
Jordan Hoellman	NRO/DLSE/LB2
Jennifer Dixon-Herrity	NRO/DLSE/LB2
Chandu Patel	NRO/DLSE/LB2
Robert Taylor	NRO/DLSE
Tim McGinty	NRO/DCIP-DEI
William Jones	RII/DCO
Michael Scott	NSIR/DPR
Bruce Musico	NSIR/DPR/RLB
Joseph Anderson	NSIR/DPR/RLB
Paul Krohn	NRO/DCIP
Pravin Patel	NRO/DEI/SEB
Antonio Barrett	NRO/DSRA/SRSB
Sheila Ray	NRR/DE/EENB
Jim Gaslevic *	NRO/DCIP/CIPB
Chris Welch *	NRO/DCIP/CIPB
Tom Scarbrough	NRO/DEI/MEB
Michael Spencer	OGC
Vic Hall *	NRO/DCIP/CIPB
Jack Frost	NSIR/DPCP/RSB
Judy Petrucelli	NSIR/DPCP/RSB
David Curtis	NSIR/DPCP
Eugene Guthrie *	RII/DRS/OB2
Jack Zhao	NRR/DE/EICA
Representing Industry	
Mike Yox	Southern Nuclear Operating Company (SNC)
Kelli Roberts	SNC
Tom Petrak	SNC
Steven Leighty	SNC
Amy Aughtman *	SNC
Catherine Prat *	SNC
Lee Doby *	SNC
Bob Beilke *	SNC
Wes Sparkman *	SNC

Name	Organization
Amy Chamberlain *	SNC
Russel Stroud *	SNC
Calvin Morrow *	SNC
John Hall *	SNC
Jim Hughes *	SNC
Ted Amundson *	SNC
Representing Public	
Steve Franzone *	Florida Power & Light
Jan Bergman *	Curtis Wright
Bill Freebairn *	S&P Global
Zach Harper *	Westinghouse Electric Company

* = participated via teleconference

Enclosure 2

Vogtle Units 3 & 4 Mailing List
cc:

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(Revised 08/16/2018)

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