



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

May 24, 2019

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Christopher G. Miller, Director, NRR/DIRS  
Shana Helton, Director, NSIR/DPCP  
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FROM: Frederick D. Brown, Director */RA/*  
Office of New Reactors

Catherine Haney, Regional Administrator */RA/*  
Region II

Ho Nieh, Director */RA/*  
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SUBJECT: REVISED CHARTER FOR THE VOGTLE READINESS GROUP  
TO OVERSEE THE TRANSITION TO OPERATIONS FOR  
VOGTLE UNITS 3 AND 4

This memorandum forwards the revised charter for the Vogtle Readiness Group (VRG). The VRG provides the necessary oversight and coordination of U.S. Nuclear Regulatory Commission (NRC) activities up to and including the transition to operations at Vogtle Electric Generating Plant (Vogtle), Units 3 and 4. The NRC instituted the VRG, consistent with "Watts Bar Nuclear Plant Unit 2 Construction Lessons Learned," dated October 31, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17356A269), and Recommendation 10 of "ITAAC Closure and Verification Demonstration Final Report," dated June 1, 2017 (ADAMS Accession No. ML17135A415).

Members of the VRG include the Office of New Reactors (NRO), Region II, Office of Nuclear Reactor Regulation (NRR), Office of Nuclear Security and Incident Response (NSIR), and Office of the General Counsel (OGC). This revision addresses plans to merge NRR and NRO as well as the interim NRO organization until the merger is completed. Following the NRR and NRO merger, NRR will assume the NRO responsibilities documented in this charter.

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The VRG is responsible and accountable for ensuring that NRC's activities on Vogtle 3 and 4 are implemented in accordance with the NRC's Principles of Good Regulation and in accordance with its reasonable assurance safety and security mission. The VRG's responsibilities include integrated project plan implementation, NRC inter-office coordination, and communications during construction; preoperational, hot functional, and startup testing; and transition to the Reactor Oversight Process after fuel load of Vogtle Units 3 and 4. The VRG serves as the focal point to ensure the effective communication of status and issues across NRC offices and to NRC management, the Commission, the licensee, and other external stakeholders.

The VRG will be in effect until Vogtle Units 3 and 4 achieve commercial operation or until a point mutually agreed upon by the Directors of NRO and NRR and the Regional Administrator, Region II. The VRG will ensure the development of a VRG lessons learned report before disbanding.

Docket No.: 52-025 and 52-026

Enclosure: VRG Charter

SUBJECT: REVISED CHARTER FOR THE VOGTLE READINESS GROUP TO OVERSEE  
 THE TRANSITION TO OPERATIONS FOR VOGTLE UNITS 3 AND 4  
 DATED: May 24, 2019

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# CHARTER

## VOGTLE READINESS GROUP

### FRAMEWORK

This charter defines the responsibilities for the Vogtle Readiness Group (VRG), as it relates to inspection and licensing activities for Vogtle Electric Generating Plant (Vogtle), Units 3 and 4, up to the point when the units start commercial operation. The U.S. Nuclear Regulatory Commission (NRC) established the VRG through the original version of this charter, dated March 12, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18059A273).

In “Staff Requirements—SECY-16-0075—Proposed Merger of the Offices of New Reactors and Nuclear Reactor Regulation,” dated September 15, 2016, the Commission approved the staff’s recommendation to merge the Office of New Reactors (NRO) and the Office of Nuclear Reactor Regulation (NRR) no later than September 30, 2020. The merger is scheduled for October 13, 2019. When the merger is completed, new reactor activities will have fully transitioned to NRR. Within NRR, the Vogtle Project Office (VPO) will oversee licensing, project management, and inspection, test, analysis, and acceptance Criteria (ITAAC) resources to support NRC activities related to the construction and startup of Vogtle Units 3 and 4. Currently, those resources are in NRO, Division of Licensing, Siting and Environmental Analysis (DLSE).

The VRG is an assessment and oversight group chaired by the members listed below. The premerger table reflects the current interim NRO organization, which restructured after the first version of this charter was issued.

#### Co-Chairs Premerger:

NRO	Director, DLSE
Region II	Director, Division of Construction Oversight (DCO)
NRR	Director, Division of Inspection and Regional Support (DIRS)

#### Co-Chairs Postmerger:

NRR	Director, VPO
Region II	Director, DCO
NRR	Director, Division of Reactor Oversight (DRO) <sup>1</sup>

<sup>1</sup> NRR/DRO assumes the relevant VRG functions of NRR/DIRS following the NRR/NRO merger.

Other NRC offices and divisions, including the following, will participate in the VRG, as necessary, to oversee project completion:

Members:

- Office of Nuclear Security and Incident Response (NSIR)
  - Division of Physical and Cyber Security Policy
  - Division of Preparedness and Response
- Office of the General Counsel (OGC)

Support:

- Region II
  - Division of Reactor Safety
  - Division of Reactor Projects
- NRR Division of Operating Reactor Licensing

For each of the membership positions, the members may delegate attendance and participation at VRG meetings. Designees shall be empowered to act for the members and to allocate resources. The VRG is authorized to make decisions when a quorum exists. A quorum shall be defined as consisting of two co-chairs and two other members (or their alternates) present at a meeting. Staff from other offices/regions may assist the VRG in its activities.

The VRG serves as the focal point for project status and for coordination among Region II, NRO, NRR, NSIR, and OGC. In addition, the VRG facilitates communications with the Commission, the Executive Director for Operations and its office direct reports, the licensee, and other external stakeholders.

## OBJECTIVES

The VRG's primary objective is to proactively identify and promptly resolve any licensing, inspection, or regulatory challenges or gaps that could impact the schedule for completion of Vogtle Units 3 and 4. To accomplish this objective, the VRG provides high-level assessments, coordination, oversight, and management direction of NRC activities associated with the licensing, inspection, testing, and operation of Vogtle Units 3 and 4. Each of the NRC offices and Region II and associated staff retains responsibility for the activities related to licensing, inspection, and assessment of Vogtle Units 3 and 4 under their purview.

The VRG reports to the Directors of NRR and NRO (NRR Deputy Director for New Reactors, post-merger) and the Regional Administrator, Region II. This includes but is not limited to periodic updates, information on license reviews, ITAAC inspections, ITAAC closure notifications (ICNs), operational programs, initial test programs, and startup activities. The updates will also include the status of hearings, late-filed allegations, inspection issues, and licensing activities that could impact the project, as applicable. The Directors of NRO and NRR, Regional Administrator for Region II, and VRG co-chairs will determine the frequency of the updates.

## SCOPE OF ACTIVITIES

The VRG meets its objectives by prioritizing resource management, project planning and execution, communications, and oversight.

### Resource Management

The VRG facilitates resource prioritization across organizational boundaries to meet inspection and licensing objectives as needed, including resources for the following:

- inspection
- licensing
- ICN review
- staff training
- transition to operations oversight

### Project Planning and Execution

The VRG provides oversight for overall project planning among the NRC offices participating in construction oversight, operational program, and preoperational and startup testing oversight; license amendment reviews; and ITAAC closure verification. The scope of VRG activities in this area include the following:

- Determine that licensing activities and inspections are conducted in a timely manner and integrated with the licensee's schedule to support construction and operational activities, the transition to operations, and the implementation of the Reactor Oversight Process.
- Determine that project leads from each of the responsible offices are established and have the authority to commit the organization's resources to meet due dates.
- Ensure that the integrated project plan (IPP), described below, is maintained to support the project through commercial operations.
- Facilitate expedited changes to inspection support documents (e.g., procedures, inspection planning documents) as needed, to support timely inspection activities.
- Identify for resolution by the appropriate office any inspection, licensing, and startup challenges before they unnecessarily impact project schedules.
- Identify areas for which regulatory gaps exist and need to be addressed.
- Provide support to the ITAAC hearing and the Title 10 of the *Code of Federal Regulations* (10 CFR) 52.103(f) petition processes and agency efforts to make the 10 CFR 52.103(g) finding.

### Communications

The VRG serves as the focal point for project status and coordination among the NRC's regional and headquarters offices, including periodic status briefings to the Directors of NRO

and NRR and the Regional Administrator, Region II. The scope of VRG communications activities include the following:

- Maintain a communication plan with input from each of the offices and Region II. Oversee plan implementation to ensure key stakeholders are informed of the review status. Coordinate with the Office of Public Affairs and the Office of Congressional Affairs.
- Maintain and periodically issue talking points on the status of the Vogtle project for use in senior NRC management briefings, bringing attention to special issues, as necessary.
- Review the inspection and ICN integrated dashboards for timeliness and effectiveness and ensure effective communications among the NRC staff and with the licensee and stakeholders.
- Communicate status of NRC activities, including licensing and technical issues that could impact the project timeline, to the Commission, NRC management, and other stakeholders, as appropriate.
- Conduct periodic meetings with the licensee to discuss progress of construction oversight, preoperation and startup oversight, license amendments, and ITAAC closure verification.
- Elevate promptly any issues that require NRC office level (or above) engagement with licensee management.
- Ensure effective coordination among NRO, NRR, Region II, NSIR, and OGC.
- Conduct periodic public meetings with external stakeholders, as appropriate, for effectiveness, openness, and transparency.
- Ensure that meeting summaries are provided, commitments are tracked, and organizations are accountable for assigned actions.

### Oversight

The scope of VRG activities in the area of oversight include the following:

- Maintain cognizance of the construction process and conduct periodic meetings among VRG members to assess ongoing NRC inspections and to resolve technical and regulatory issues that may arise.
- Provide up-to-date information on the IPP schedule to all relevant offices.
- Oversee coordination of safety, security, and emergency planning interfaces between the units under construction and the operating units on the same site and ensure that issues in these areas are communicated to affected NRC staff.

- Maintain cognizance of construction project performance. Review agency metrics to monitor consistency and effectiveness of inspections, ICN actions, and other activities, using the following tools:
  - license amendment request tracking database
  - inspection of submitted and upcoming ICNs
  - ICN closure tracking (Verification of ITAAC Closure, Evaluation, and Status (VOICES))
  - inspection issues metrics (technical assistance requests, violations, allegations)
- Develop and maintain the IPP to track and monitor adherence to the project schedule, including all interim milestones.
- Facilitate interactions so that the NRC staff is adequately prepared to support meetings.
- Identify issues that affect any of these oversight functions and facilitate their timely resolution.
- Provide support to the ITAAC hearing process.

#### VRG MEETING FREQUENCY

VRG meetings occur twice per quarter to ensure the IPP schedules are met and new and existing activities are identified and tracked through completion. The VRG will meet more frequently if the VRG deems it necessary based on pending activities and other stakeholder interest. The VRG leverages its meetings with existing management meetings as practical. The meetings take place near Vogtle Units 3 and 4, the Region II office, or NRC Headquarters. Members attend the meetings in person or through teleconference, video teleconference, Skype for Business, or GoToMeeting.

#### VRG DURATION

The VRG will be in effect until Vogtle Units 3 and 4 achieve commercial operation or until a point mutually agreed upon by the Directors of NRO and NRR and the Regional Administrator, Region II.

#### REPORTING RESPONSIBILITY

The VRG reports to the Directors of NRR and NRO (NRR Deputy Director for New Reactors, post-merger) and the Regional Administrator, Region II.

#### INTEGRATED PROJECT PLAN SCOPE AND EXECUTION

The staff maintains the IPP to inform the VRG and other NRC senior leadership and staff of the ongoing and scheduled activities related to the completion of construction, initial testing, implementation of operational programs, and transition to operations for Vogtle Units 3 and 4. The VRG uses the IPP to track scheduled activities and identify potential critical paths related to the completion of construction. The IPP identifies key activities leading up to and following the decision under 10 CFR 52.103(g), up to the point of commercial operation. The IPP lists



the regulatory milestones for the transition of Vogtle's construction to operations, including interdependencies and ties to the licensee's construction schedule. The plan also includes key activities and interfaces between the NRC and the licensee and the numerous stakeholders.

The VRG directed the formation of the IPP Working Group (WG) to develop the IPP using the Oracle® Primavera platform. The IPP WG consists of representatives from each of the key areas addressed in the IPP. These areas include license amendments, initial testing, implementation of operational programs, transition to operations, cybersecurity, emergency preparedness, security transition (nonsafeguards), transition from construction to operating reactor oversight, and key communications with stakeholders. The IPP also includes the development of inspection support documents, as needed, to support the schedule for the site. Region II maintains the IPP in Primavera. The members of the IPP WG share the responsibility to provide updated information on a monthly basis to a SharePoint® database, coincident with licensee provision of its updated Primavera construction schedule. Region II staff then use the database to update the IPP. WG members serve as the points of contact for updates to the IPP and related actions.

#### ESTIMATED NUMBER AND FREQUENCY OF PUBLIC MEETINGS

Starting in the third quarter of fiscal year 2018, the VRG has held public meetings with the licensee to discuss the status of the construction program, significant inspection and licensing issues, and the transition to operations. These meetings will continue to take place semiannually; the VRG may adjust the frequency based on pending activities and other stakeholder interest. The VRG will coordinate these meetings with existing public meetings, as practical.

#### REVISIONS TO THE CHARTER

The co-chairs are jointly authorized to make changes to this charter that do not reduce its overall effectiveness in meeting the objectives delineated in the project priorities, such as changes in membership, with notification of all changes being communicated to the undersigned Office Directors, the General Counsel, and the Regional Administrator, Region II. The communication will occur prior to the change being implemented.

APPROVAL

This charter is approved for implementation by:

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Frederick Brown, Director  
Office of New Reactors

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Catherine Haney, Regional Administrator  
Region II

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Ho Nieh, Director  
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Brian Holian, Director  
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