

Vogle PEmails

From: Habib, Donald
Sent: Friday, May 31, 2019 2:47 PM
To: Vogle PEmails
Subject: Vogle June 13 Meeting Presentation - FLEX Staff and Comms
Attachments: June 13 Meeting Presentation - FLEX Staff and Comms (003).pdf

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Subject: Vogtle June 13 Meeting Presentation - FLEX Staff and Comms
Sent Date: 5/31/2019 2:46:52 PM
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"Vogtle PEmails" <Vogtle.PEmails@nrc.gov>
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□ Vogtle 3&4 FLEX Implementation Plan (Meeting 2)

Paul Marcotte

June 13, 2019



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MBDBE Public Meeting Summary

TOPIC	DATE	FOLLOW UP (if necessary)
Hazards	3/21/19	None
FLEX Closure Process	3/21/19	6/13/19 - NRC Feedback
EA-12-051: SFPLI (sidebar)	3/21/19	6/13/19 - SNC Update
NTTF 9.3 Communications	6/13/19	
NTTF 9.3 Staffing	6/13/19	
FLEX Verification/Validation	TBD	
MBDBE Rule Implications	TBD	
Future meetings / public calls	TBD	



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Topics

- Follow-Up to 3/21/19 Meeting
 - NRC Feedback: Vogtle 3&4 Roadmap to Compliance
 - SNC Update: EA-12-051: Spent Fuel Pool Level Instrumentation (SFPLI)
- Focused Discussion: NTTF 9.3
 - 50.54(f) Communications Assessments
 - 50.54(f) Staffing Assessment
- References



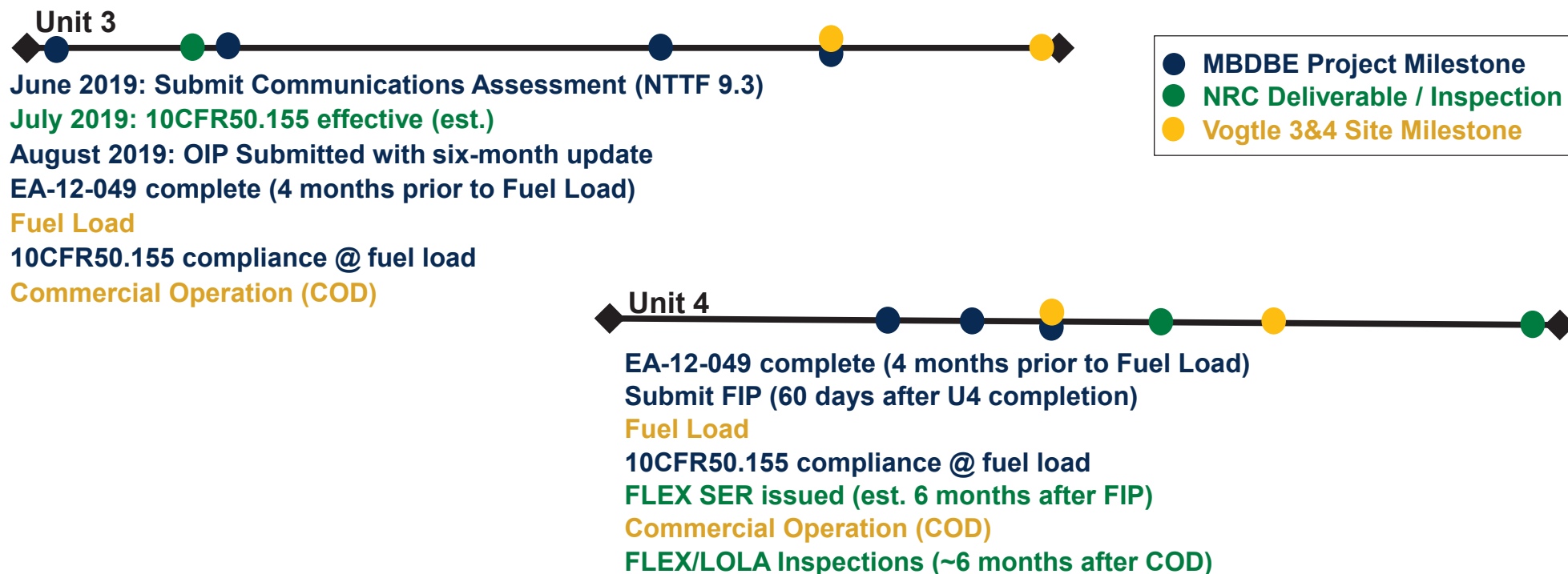
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Vogtle 3&4 Roadmap to Compliance



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SNC Update – EA-12-051

Spent Fuel Pool Level Instrumentation (SFPLI)

- SER Issued (ML13329A878)
- SER Conclusions Basis:
 - The licensee's response to EA-12-051 is acceptable because, as described in APP-SFS-MSR-03, it includes provisions for SFP instrumentation arrangement, qualification, power sources, accuracy and display that are consistent with the requirements described in SECY-12-0025 and Commission Order EA-12-051.
 - The proposed provisions for training related to the reliable SFP instrumentation are acceptable because they provide for the instrumentation to be maintained available and reliable through appropriate development and implementation of a training program including provisions for use of alternate power to the safety-related level instrument channels.



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Focused Discussion: NTTF 9.3

- NTTF 9.3 Communication and Staffing Actions
 - 50.54(f) Communications Assessment
 - 50.54(f) Staffing Assessment



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NTTF 9.3 Communications & Staffing Actions

- Operating Fleet in 2012:
 - EP Rule issued in fall 2011, required staffing assessments per NEI 10-05 for single unit events
 - Procedures and guidance addressed single unit events
 - 50.54(f) Requested information on how sites would cope for an extended loss of AC power (ELAP) with existing procedures and guidance
 - Majority of actions and vulnerabilities were within the first 6 hours of an event
 - NRC Accepted a phased approach,
 - Assessing current state with actions to cope with vulnerabilities
 - Documenting capabilities post-FLEX
- Differs from Vogtle 3&4 FLEX program:
 - AP1000 designed as stand alone Unit with separate control room staff and support equipment
 - EP Rule effective with NEI 10-05 Study performed
 - No interim actions needed since not operating yet



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50.54(f) Communications Assessment

- **Planned submittal to NRC in June 2019**
- **Similar in format to Vogtle 1&2 assessment (NL-12-2070)**
 - Portable handheld satellite phones for initial notification (housed in TSC/MCR)
 - Utilize RapidCOM and RapidCase Satellite Communications equipment
 - Timeline for RapidCOM allows Vogtle 1&2 FLEX deployment to take priority
- **Design basis allows for required communication for off-site and select on-site locations**
 - Will Utilize Bullhorn/Self Mustering during an ELAP



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50.54(f) Staffing Assessment

- **Vogtle Electric Generating Plant - Units 3 and 4 60-Day Response to NRC Letter stated the Phase 1 & 2 staffing assessment will be completed prior to the full scale EP exercise which will be conducted prior to fuel load of Vogtle 3 (ML12131A540)**

1.3.1 Staffing

A 2-phase approach will be used to respond to the information requests associated with Staffing. The table below summarizes this approach.

- **Endorsed guidance NEI 12-01 states the Phase 1 staffing study for a Single Unit Plant is the NEI 10-05 study**
 - Until Vogtle 4 is operational, Vogtle 3 is considered a single unit plant
- **Additionally, for a Multi-Unit site the Phase 1 study provides actions for vulnerabilities in the operating units**
 - Vogtle 3 & 4 have no existing vulnerabilities

Plant Type	Phase 1 Staffing Assessment (for functions except those related to NTTF Recommendation 4.2)	Phase 2 Staffing Assessment (for functions related to NTTF Recommendation 4.2)
Single-unit plants	Perform staffing assessment and implement actions as required by recent EP Rule using ISG and NEI 10-05	Perform staffing assessment as requested by 50.54(f) letter using NEI 12-01; provide results per alternative course of action described in 60-day letter
Multi-unit plants	<ul style="list-style-type: none"> • Perform staffing assessment and implement actions as required by recent EP Rule using ISG and NEI 10-05 • Perform staffing assessment as requested by 50.54(f) letter using NEI 12-01 and material from NEI 10-05; provide results per alternative course of action described in 60-day letter 	Perform staffing assessment as requested by 50.54(f) letter using NEI 12-01; provide results per alternative course of action described in 60-day letter



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50.54(f) Staffing Assessment (cont'd)

- **Proposal: Revise current commitment for NEI 12-01 Staffing Assessment from prior to Unit 3 fuel load (ML12131A540) to be prior to Unit 4 Fuel Load**
 - Conduct an NEI 12-01 Phase 2 Study to cover both Units 3&4
 - Utilize the latest approved Emergency Plan Staffing at that time
- **Justification**
 - AP1000 design requires minimal actions in first 72 hours
 - NEI 12-01 Staffing Assessment concentrates primarily on first 6 hours, with limited assessment from 6-24 hours, thus of little consequence in a 72 hour passive design
 - Would utilize the proposed change to Fleet Emergency Plan Staffing
 - Submission of 2019 assessment per FLEX 6-month update submittal (ML19056A206) would be invalidated

References

- **ML13329A878:** Vogtle Units 3 and 4 - Safety Evaluation Regarding the Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation for Vogtle Units 3 and 4, February 21, 2014
- **ML12306A201 dated October 31, 2012:** Vogtle Electric Generating Plant- Units 1 and 2 Emergency Preparedness Information Requested by NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Daiichi Accident, dated March 12, 2012
- **ML12131A540 (ND-12-0987 dated May 9, 2012):** Vogtle Electric Generating Plant - Units 3 and 4 60-Day Response to NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Daiichi Accident. dated March 12, 2012
- **ML19056A206:** Vogtle Electric Generating Plant – Units 3 and 4 Eleventh Six-Month Status Report of the Implementation of the Requirements of the Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049) dated Feb 25, 2019



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