



## Southern Nuclear

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Docket Nos.: 52-025  
52-026

ND-19-0684  
10 CFR 55.53

Mr. Eugene Guthrie  
U.S. Nuclear Regulatory Commission, Region II  
245 Peachtree Center Avenue NE, Suite 1200  
Atlanta, GA 30303-1257

Subject: Vogtle Electric Generating Plant Unit 3 - Active Operator License Maintenance

Dear Mr. Guthrie,

The purpose of this letter is to document the strategy that Southern Nuclear Operating Company (SNC) will implement to ensure licensed operators at Vogtle Electric Generating Plant (VEGP) Unit 3 obtain credit for watch-standing proficiency during the period after the issuance of the operator licenses until initial fuel load.

Recommendations for the operator licensing process for cold plants were developed by the Nuclear Regulatory Commission (NRC) (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18039A950). Part A of the report, *Charter: Operator Licensing Process for Cold Plants*, states in part:

*For cold plant construction projects, operator licenses should be issued to applicants who meet all statutory and regulatory requirements necessary for an operator or senior operator under 10 CFR Part 55, after the facility licensee has staffed the main control room. Refer to ES-202, Attachment 2, and "Operator Licensing Milestones for 10 CFR Part 52 Plants under Construction."*

To maintain active status, 10 CFR 55.53(e) requires operators to perform the minimum quarterly licensed operator functions. Therefore, once operator licenses are issued, but before initial fuel load, a methodology for license maintenance for cold plants is required. During this time, licensed operators at VEGP Unit 3 will be performing the functions of an operator including testing and operation of safety-significant systems during pre-operational testing.

SNC personnel in operations, licensing, and training have reviewed watch-standing hours (i.e., proficiency watches) for cold plants to determine if operators could be credited for meeting the regulatory requirements. 10 CFR 55.53 (e) states in part:

*If a licensee has not been actively performing the functions of an operator [RO] or senior operator [SRO], the licensee may not resume activities authorized by a license issued under this part except as permitted by paragraph (f) of this section [i.e., qualifications are*

*current and valid; and that the licensee has completed a minimum of 40 hours of shift function]. To maintain active status, the licensee shall actively perform the functions of an operator or senior operator on a minimum of seven 8-hour or five 12-hour shifts per calendar quarter.*

As delineated in NUREG-1021, ES-605 C.2(b), and in accordance with 10 CFR 55.4, "actively performing the functions of an operator or senior operator" means that an individual has a position on a shift crew that requires an individual to be licensed as defined in the facility's Technical Specifications (TS). VEGP Unit 3 is required to implement TS when the Commission makes the finding under 10 CFR 52.103(g).

The SNC administrative procedure which governs maintenance of active licenses credits the following positions for actively performing the functions of a RO or SRO:

- On-shift as Operator at the Controls (OATC)
- On-shift as Unit Operator (UO)
- On-shift as Shift Supervisor (SS)
- On-shift as Shift Manager (SM)

The administrative procedure describes the details of how each position is meaningfully and fully engaged in functions and duties analogous to the minimum licensed positions required by TS. In general, the positions described in the procedure will be staffed during construction and pre-operational testing identical to how the positions are staffed at an operating plant. For example, the SM is the senior licensed person and will have the same degree of responsibility whether the plant is under construction, testing, or operating; the SM will routinely relieve the Control Room Supervisors. As well, the UO has the same degree of responsibility during construction, testing, and when operating, routinely relieving the OATC and performing RO duties.

Watch-standing proficiency credit may also be appropriate for certain licensed reactor operator (RO) or senior reactor operator (SRO) crew positions that are in excess of those required by a facility's TS. To credit watch-standing proficiency for such excess positions, SNC will utilize the following procedural administrative controls:

- A list of all the licensed shift crew positions, including title, description of duties, and indication of which positions are required by TS; and
- For shift crew positions in excess of those required by TS, a description of how the position is meaningfully and fully engaged in the functions and duties of the analogous minimum licensed position(s) required by TS.

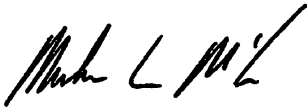
During pre-operational testing, systems listed in NUREG-1021, Form ES-401N-2, as Tier 2 *Plant Systems*, will be tested and operated. The administrative procedure which governs maintenance of active licenses allows these shifts to be credited for proficiency. These shifts have "meaningfulness" because ROs and SROs have the same level of responsibility for plant operations during testing as when the plant is operational.

Requalification training will be ongoing throughout the duration of pre-operational testing, preparing the licensed operators for initial criticality. Just-In-Time (JIT) training will be utilized for safety-significant evolutions such as initial criticality and low power physics testing. The combination of requalification and JIT training will ensure that the operators are proficient before standing watch during the reactor startup and power ascension.

If you have any questions, please contact me at (706) 848-6984.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

A handwritten signature in black ink, appearing to read "Michael L. McCue". The signature is stylized and written in a cursive-like font.

Michael L. McCue  
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Plant Vogtle 3 & 4

MLM/PSF/sfr

cc:

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