



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

September 16, 2019

MEMORANDUM TO: Victor Hall, Chief
Construction Inspection Program Branch
Division of Licensing, Siting,
and Environmental Analysis
Office of New Reactors

FROM: James Gaslevic, Reactor Operations Engineer */RA/*
Construction Inspection Program Branch
Division of Licensing, Siting,
and Environmental Analysis
Office of New Reactors

SUBJECT: SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR
OPERATING COMPANY ON SEPTEMBER 10, 2019

The U.S. Nuclear Regulatory Commission (NRC) staff held a Category 1 public meeting with Southern Nuclear Operating Company's (SNC, or licensee) staff at NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville, Maryland on September 10, 2019. The purpose of the meeting was to discuss draft document formats to be submitted on the Title 10 of the *Code of Federal Regulations* (10 CFR) Section 52.103(g) finding process for SNC's Vogtle Electric Generating Plant Units 3 and 4, and exercise different scenarios for the 10 CFR 52.103(g) finding.

The meeting notice can be found in the Agencywide Documents Access and Management System (ADAMS) under Accession Number ML19252A258. 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 meeting slides used during the discussion can be found under Accession Number ML19224A924. The draft documents can be found under Accession Number ML19240A051. The meeting slides submitted by SNC can be found under Accession Number ML19249C726. The meeting slides used by NRC staff can be found under ML19252A150.

Summary of Meeting:

On September 10, 2019, the NRC staff held a public meeting with SNC to discuss draft notifications to be submitted on the 10 CFR 52.103(g) finding process for SNC's Vogtle Electric Generating Plant Units 3 and 4, as well as different scenarios that could affect the expected time to process the 10 CFR 52.103(g) finding. The meeting included both open and closed sessions as shown on the meeting agenda in Enclosure 1.

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After the NRC provided opening comments, SNC presented three draft notifications: a draft 52.103(a) Notice of Intent to Operate, a draft 52.99(c)(4) All ITAAC Complete Notification pursuant to 10 CFR 52.99(c)(4), and a draft Notice of Uncompleted ITAAC 315-days Prior to Initial Fuel Load pursuant to 10 CFR 52.99(c)(3).

Staff recommended minor edits to the draft 10 CFR 52.99(c)(4) notification, including a statement be added that the completed inspections, tests, analyses, and acceptance criteria (ITAAC) are being maintained.

SNC then discussed prerequisites that the NRC would need from SNC in order to reduce the 52.103(g) process time. A common takeaway from most of the examples was early and frequent communication between SNC and NRC staff in the time leading up to the 52.103(g) finding. Following this, SNC presented different scenarios that could impact the 10 CFR 52.103(g) process time. These scenarios included ITAAC maintenance and ITAAC finding examples that focused on the timing of issues close to the 52.103(g) finding. The discussions demonstrated that the existing NRC processes are capable of resolving various issues associated with findings and maintenance, particularly where ITAAC post-closure notifications (IPCNs, pursuant to 10 CFR 52.99(c)(2)) are required.

The remaining scenarios on late filed allegations, license amendment requests impacting ITAAC, and situations when the methodology for completing an ITAAC in an ITAAC closure notification (ICN, pursuant to 10 CFR 52.99(c)(1)) is different from that shown in an uncomplete ITAAC notification (UIN, pursuant to 10 CFR 52.99(c)(3)) were started in the open session. Staff explained the existing agency processes that were applicable to each scenario. Due to proprietary information presented by SNC, these scenarios were then completed during the closed session.

The scenario discussions of the closed session resulted in items that warrant further consideration by staff. These include:

- In situations where a license amendment request (LAR) has been submitted to the NRC to address a problem identified with an ITAAC, it is unclear if a UIN should be written and submitted in accordance with the current COL ITAAC or the revision that is proposed in the LAR.
- If a condition is discovered that affects a completed ITAAC, and the post work verification needed to re-establish that ITAAC is a narrower scope than the original ITAAC test, it is not clearly defined what portion of the original ITA is acceptable without the need to submit an IPCN due to what would be considered a change in ITAAC completion methodology.
- In situations where a discovery leads to an ITAAC finding and also a design issue potentially impacting operations, further guidance is needed to define how the finding would be transferred past the date for the 52.103(g) finding.

Members of the public did not provide comments or ask questions.

V. Hall

- 3 -

Docket Nos.: 052-025
052-026

Enclosures:
As stated

cc w/ encls.: See next page

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OPERATING COMPANY ON SEPTEMBER 10, 2019
Dated: September 16, 2019

DISTRIBUTION:

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ADAMS Accession No.: ML19259A265 *via e-mail NRC-007

OFFICE	NRO/DLSE	NRO/DLSE
NAME	JGaslevic	VHall*
DATE	9/13/19	9/13/19

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**AGENDA FOR PUBLIC MEETING
U.S. NUCLEAR REGULATORY COMMISSION
AND
SOUTHERN NUCLEAR OPERATING COMPANY (SNC)
Tuesday, September 10, 2019
9:00 AM to 2:00 PM**

<u>Time</u>	<u>Topic</u>	<u>Organizational Lead</u>
9:00 a.m.	Introduction	NRC/SNC
9:05 a.m.	Draft 315-day letter, draft Notice of Intent to Operate letter, draft ITAAC All Complete letter Scenario 1 – ITAAC Maintenance non-reportable example Scenario 2 – ITAAC Maintenance reportable example Scenario 3 – Green ITAAC finding in last inspections Scenario 4 – Greater than Green ITAAC finding in last inspections Scenario 5 – Credible late filed allegation Scenario 6—LAR impacting ITAAC Scenario 7—ICN Methodology different from UIN	NRC/SNC
10:15 a.m.	Opportunity For Public Comment	PUBLIC/NRC
11:00 a.m.	Closed Session	NRC/SNC
3:00 p.m.	Adjourn	

PUBLIC MEETING
U.S. NUCLEAR REGULATORY COMMISSION
 Tuesday, September 10, 2019
 9:00 AM to 2:00 PM

List of Attendees	
Name	Organization
Representing the Nuclear Regulatory Commission	
James Gaslevic	NRO/DLSE/CIPB
Victor Hall	NRO/DLSE/CIPB
Mike King	NRO/DLSE
William Jones	RII/DCO
Michael Spencer	NRO/OGC
Julie Ezell	NRO/OGC
Nicole Coovert	RII/DCO/CIB1
Michael Webb	NRO/DLSE/CIPB
Don Habib	NRO/DLSE/LB2
Chris Welch	NRO/DLSE/CIPB
Andrea Johnson	NRO/DLSE/CIPB
Chandu Patel	NRO/DLSE/LB2
Representing the Applicant/Licensee	
Thomas Petrak*	Southern Nuclear Operating Company (SNC)
Charles Pierce	SNC
Mike Yox*	SNC
Kelli Roberts	SNC
Steven Leighty	SNC
Key Warren	SNC
Kara Stacy*	SNC
Peter LeJeune	SNC/Balch
Paul Bessette	SNC/Morgan Lewis
Representing the Public	
Steve Franzone*	Florida Power and Light
Monica Ray*	Energy Compliance

* Participated via teleconference

Vogtle Units 3 & 4 Mailing List

(Revised 05/08/2019)

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Mr. Wayne Guilfoyle
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