



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

September 19, 2019

Southern Nuclear Operating Company
Attention: Mr. Michael L. McCue
Training Director
Vogtle Unit 3 and 4
7825 River Road
Waynesboro, GA 30830

SUBJECT: VOGTLE ELECTRIC GENERATING PLANT UNIT 3 – PROFICIENCY WATCHES
PRIOR TO FUEL LOAD

Dear Mr. McCue:

This letter is in response to Southern Nuclear Operating Company's (SNC) July 2, 2019 (ADAMS Accession No. ML19235A016) letter to NRC Region II, Operations Branch No. 2 regarding the strategy that SNC proposes for Vogtle Electric Generating Plant (VEGP) Unit 3 to give licensed operators credit for actively performing the functions of an operator or senior operator when operator licenses are issued before initial fuel load. SNC proposes that licensed operators [i.e., reactor operators (ROs) and senior reactor operators (SROs)] assigned to the following main control room crew positions receive credit for standing watch when they actively perform the functions of an operator or senior operator for the four positions listed below during the period before initial fuel load:

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

SNC proposes that these positions receive credit for standing watch when they actively perform the functions of an operator or senior operator these positions because 1) they are identical to the crew positions when the plant is operating, and 2) SNC's administrative procedure, NMP-OS-026, "License Administration," defines the duties that are only allowed to be performed by these positions and have the same degree of responsibility and respect for reactivity controls and apparatus as if fuel was loaded in the reactor vessel.

SNC also proposes that when crews include additional ROs and SROs to stand watch and actively perform duties, in what the facility licensee refers to as "excess" positions, those ROs and SROs in "excess" positions listed above also receive credit. Under the facility licensee's approach, ROs and SROs in "excess" positions on crews would receive credit for actively performing the functions of an operator or senior operator if the role in the "excess" position is meaningful, and the operator is fully engaged in the functions and duties of the analogous main control room positions listed above.

The NRC agrees that SNC's proposal, detailed in its July 2, 2019 letter, is an acceptable approach to maintaining active licenses for ROs and SROs prior to initial fuel load. The following discussion provides a basis for approving this approach.

NRC regulations include minimum requirements for the number of shifts and general types of functions that ROs and SROs must complete in order to maintain active status. Section 55.53(e) states, in part: "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. Section CFR 55.4 defines "actively performing the function of an operator or senior operator" as meaning "that an individual has a position on the shift crew that requires the individual to be licensed as defined in the facility technical specifications, and that the individual carries out and is responsible for the duties covered by that position." Therefore, to meet these regulatory requirements, ROs and SROs will be: 1) responsible for actively performing the functions of an operator or senior operator, 2) for the required number of quarterly shifts, 3) while in a position on a shift crew that requires a license under the facility technical specifications (TS).

Prior to initial fuel load, under SNC's administrative procedure addressing maintenance of active operator licenses, main control room crew performing the functions of ROs and SROs (i.e., the positions of OATC, UO, SS, and SM) will perform meaningful duties analogous to those minimum licensed positions under the TS. For example, ROs and SROs will complete a shift in a credited SRO or RO position during pre-operational testing while systems classified as "Tier 2" in NUREG-1021 Examination Standard Form 401N-2, "AP1000 Examination Outline" are being operated or tested for at least seven complete 8-hour or five complete 12-hour shifts per calendar quarter.

In considering the nature of the functions SNC's administrative procedure describes for the ROs and SROs prior to fuel load, the NRC staff notes that the duties of an operator or senior operator are not defined in detail in the NRC's regulations. Section 55.4 indicates that an "operator" receives a license to "manipulate a control of a facility," while a "senior reactor operator" has the additional responsibility "to direct the licensed activities of licensed operators." Sections 50.54(i) and (j) provide that operator and senior operator duties include the manipulation of controls, and apparatus and mechanisms other than controls that may affect the reactivity or power level of a reactor.

Section 55.4, states that "controls when used with respect to a nuclear reactor means apparatus and mechanisms the manipulation of which directly affects the reactivity or power level of the reactor." SNC's administrative procedure specifies that only licensed operators can perform licensed operator duties in the main control room. This includes operating the controls and apparatus during preoperational testing that, once fuel has been loaded and plant startup occurs, will directly affect reactivity or power level. These are duties that would require an individual to be licensed to perform them once the TS are in effect. SNC's administrative procedure also provides for ROs and SROs to perform duties that are of the same level of responsibility, whether the plant is under construction, pre-operational testing, or operating.

Therefore, during the period between when the NRC issues operator licenses until initial fuel load, operators or senior operators assigned to a crew position in the main control room can meet the 10 CFR 55.53(e) requirement to maintain active status by actively performing the functions of an operator or senior operator on a minimum of seven 8-hour or five 12-hour shifts per calendar quarter, consistent with SNC administrative procedure NMP-OS-026. The NRC further notes that SNC's commitment to conduct continued operator training using a Systems

Approach to Training for the licensed operators in accordance with 10 CFR 55.53(h) will further support the maintenance of licensed operator proficiency.

With respect to its proposal for crediting watch-standing proficiency for “excess” crew positions, when crew members actively perform the functions of operator or senior operator positions in “excess” of the four control room crew, SNC stated that it will implement an administrative control to ensure that such positions are meaningful, and that members are fully engaged in the functions and duties of the analogous minimum licensed positions required by the TS. This proposal for crediting “excess” crew is acceptable because it is consistent with the guidance in NUREG-1021, ES-605, Section C.2.b.

Summary:

The NRC has determined that SNC’s proposed strategy to give credit to licensed operators for standing watch when they actively perform the functions of operator or senior operator for the four positions (OATC, UO, SS, and SM) during the period when operator licenses are issued before initial fuel load is consistent with the requirements of 10 CFR 55.53(e) for actively performing the functions of an operator or senior operator. Moreover, crediting licensed operators for standing watch when they actively perform the functions of operator or senior operator for positions in “excess” of the four specific positions in the main control room is consistent with the guidance in NUREG-1021, ES-605, Section C.2.b.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Website at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Christopher G. Miller, Director
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

Docket No.: 50-302
License No.: DPR-72

cc: Michael Yox, Southern Nuclear Company Regulatory Affairs
Kelli Anne Roberts, Vogtle Licensing Manager

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PRIOR TO FUEL LOAD SEPTEMBER 19, 2019

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