



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

October 1, 2019

MEMORANDUM TO: Jennifer Dixon-Herrity, Chief  
Licensing Branch 2  
Division of Licensing, Siting, and  
Environmental Analysis  
Office of New Reactors

FROM: Jennivine Rankin, Project Manager **/RA/**  
Licensing Branch 2  
Division of Licensing, Siting, and  
Environmental Analysis  
Office of New Reactors

SUBJECT: SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR  
OPERATING COMPANY ON SEPTEMBER 26, 2019

The U.S. Nuclear Regulatory Commission (NRC) staff held a Category 1 public meeting with Southern Nuclear Operating Company (SNC) on September 26, 2019. The purpose of the meeting was to conduct technical discussions on License Amendment Request (LAR) 19-001, "Request for License Amendment Regarding Protection and Safety Monitoring System Surveillance Requirement Reduction Technical Specification Revision" and LAR 19-017, "Removal of the Preoperational Passive Residual Heat Removal Heat Exchanger Natural Circulation Test."

The meeting notice can be found in the Agencywide Documents Access and Management System (ADAMS) Accession No. ML19207A050. The meeting notice was posted on the NRC public website. Enclosures 1 and 2 are the meeting agenda and attendance list for the meeting, respectively. The documents referenced during the discussion can be found at the ADAMS Accession Nos. given below:

- Draft LAR Supplement for LAR 19-001 ML19267A195
- LAR 19-017: Removal of the Preoperational  
Passive Residual Heat Removal Heat Exchanger  
Natural Circulation ML19249C738

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Summary of Meeting:Technical Discussion on Draft LAR Supplement for LAR 19-001

On September 26, 2019, staff from the NRC conducted a public meeting with representatives from SNC to discuss a draft LAR supplement for LAR 19-001 regarding protection and safety monitoring system (PMS) surveillance requirement reductions. SNC staff explained the changes that were made as a result of the regulatory audit. In addition, SNC described rescinding the deletion of the channel check surveillance for several PMS functions because they are not fully covered by self-diagnostics. NRC requested clarification of certain changes and provided the following observations:

1. Consider using consistent terminology when referring to self-diagnostic features and functions.
2. Consider clarifying the TS Bases of 3.3.17 to clarify what is normally energized.
3. Consider clarifying which functional requirements are being referred to in TS Bases 3.3.1.8.

In addition, during the discussion, SNC agreed to include the following in the LAR supplement.

1. Provide a summary of the four Component Interface Module CIM self-diagnostics.
2. Correct the proposed language in the Updated Final Safety Analysis Report (UFSAR) Section 7.1.2.11 to specify applicability to the faults which are detected by diagnostics.
3. Provide additional information on any review of system logs.

SNC noted they intend to submit the formal supplement by October 4, 2019.

In the closed portion of the pre-submittal discussion, SNC discussed the proprietary technical details of the PMS system in relation to the LAR.

Technical Discussion on Removal of the Preoperational Passive Residual Heat Removal Heat Exchanger Natural Circulation (LAR 19-017)

On September 26, 2019, staff from the NRC conducted a public meeting with representatives from SNC to discuss the progress of the staff's acceptance review of LAR 19-017. The LAR requests a change to remove the natural circulation test of the passive residual heat removal (PRHR) heat exchanger, which is conducted during preoperational testing, from the scope of the initial test program. The NRC staff explained that during the acceptance review, the NRC did not find adequate justification for the proposed removal of an initial test and related modification to an Inspection, Test and Acceptance Criteria (ITAAC) requiring the SNC to conduct a PRHR heat exchanger natural circulation test. Staff clarified that natural circulation flow rate was a key system performance parameter and verification of this parameter was important in satisfying Title 10 *Code of Federal Regulations* (10 CFR) Part 50, Appendix A, General Design Criterion (GDC) 37, "Testing of Emergency Core Cooling System," and LAR 19-017 did not justify how this parameter was confirmed for the as built condition. The NRC staff noted that this is important for confirming safety-related natural circulation cooling of the

core during a design basis accident not involving loss of coolant and all AP1000 plants are required to do it as part of the initial test program (i.e., this is not a first-of-a-kind test). Although the applicant noted (and the staff agreed) that the forced circulation test is used for continued operability justification to meet GDC 37, initial demonstration represents an important part of meeting GDC 37. The proposed removal of the test would not provide a clear means for demonstrating natural circulation flow.

SNC took an action to reexamine the LAR and determine their next course of action.

Docket Nos.: 52-025  
52-026

Enclosure:  
As stated

cc w/encls: See next page

SUBJECT: SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR  
OPERATING COMPANY ON SEPTEMBER 26, 2019

**DISTRIBUTION:**

PUBLIC	CPatel, NRO
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**ADAMS Accession No.: ML19270G587**

**\*via e-mail**

**NRC-008**

OFFICE	PM: DLSE/LB2	LA: DLSE/LB2	PM: DLSE/LB2	BC: DLSE/LB2
NAME	JRankin* (c)	RButler*	CPatel*	JDixon-Herrity
DATE	9/27/19	9/30/19	9/30/19	10/01/19
OFFICE	PM: DLSE/LB2			
NAME	JRankin (s)			
DATE	10/01/19			

**OFFICIAL RECORD COPY**

**AGENDA FOR PUBLIC MEETING  
U.S. NUCLEAR REGULATORY COMMISSION (NRC)  
Thursday, September 26, 2019  
Teleconference  
9:00 a.m. – 12:00 p.m.**

PURPOSE: To discuss issues associated with the safety review of licensing actions for Southern Nuclear Operating Company's (SNC) Vogtle Electric Generating Plant (VEGP) Units 3 and 4.

**OPEN**

<u>Time</u>	<u>Topic</u>	<u>Led By</u>
9:00 a.m.	Opening Remarks	NRC
9:10 a.m.	Discussion of Identified Topics	NRC/SNC
	Opportunity for Public Comment	NRC/Public
	Open Portion Concludes	
<b><u>CLOSED.</u></b>	(If needed)	NRC/SNC
12:00 p.m.	Adjourn	

Enclosure 1

**PUBLIC MEETING**  
**U.S. NUCLEAR REGULATORY COMMISSION**  
**Thursday, September 26, 2019**  
**One White Flint North, Room O-11B4**  
**9:00 a.m. – 12:00 p.m.**

**List of Attendees**

Name	Organization
<b>Representing the Nuclear Regulatory Commission</b>	
Chandu Patel Jennivine Rankin Robert Taylor Jennifer Dixon-Herrity	NRO/DLSE
Boyce Travis Becky Karas Kevin Coyne Malcolm Patterson Harry Wagage	NRO/DSER
Jack Zhao Dinesh Taneja William Roggenbrodt Nancy Salgado	NRR/DE
Molly Keefe Greg Galletti Kerri Kavanagh* Andrea Kiem	NRR/DIRS
Craig Harbuck Vic Cusumano	NRR/DSS
<b>Representing Industry</b>	
John Wiesmann* Bob Hirmanpour Pareez Goloub Adams Quarles* Michael Elmer* Amy Chamberlain Stephanie Agee Mark Humphrey* Neil Haggerty* Yasmeen Arafeh* Eddie Grant* Dan Williamson* Steve Merkiel* Ron Scanlon* Jonathon Hartmann* Michael Yox* Steve Leighty* Nick Kellenberger* Steven Unikewicz* Pamela Fergen*	Southern Nuclear Company

Name	Organization
Zach Harper*	
Rick Paese Warren Odess-Gilett*	Westinghouse Electric Company
<b>Members of the Public</b>	
Marv Lewis	Public
Doug Cheshire	Georgia Public Service Commission

\* = participated via teleconference

Vogtle Units 3 & 4 Mailing List

(Revised 08/13/2019)

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