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Reactor Oversight Process Enhancement Initiative

Comment On: NRC-2019-0155-0001
Reactor Oversight Process Enhancement Initiative

Document: NRC-2019-0155-DRAFT-0081
Comment on FR Doc # 2019-16876

Submitter Information

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General Comment

See attached file(s)

Attachments

NL-19-1221 SNC Response to NRC Solicitation for Comments on Potential Improvements to the Reactor Oversight Process

October 7, 2019

Docket Nos.: 50-348 50-321 50-424 52-025 NL-19-1221
50-364 50-366 50-425 52-026

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555-0001

SNC Response to NRC Solicitation for Comments
on Potential Improvements to the Reactor Oversight Process

Ladies and Gentlemen:

In Federal Register Notice (FRN) 2019-16876, the NRC summarized its approach in developing targeted, near-term recommendations (ROP Enhancement Initiative Phase 1) for consideration by the Commission in revising the NRC's Reactor Oversight Process (ROP).¹ Additionally, the NRC announced solicitation of stakeholder feedback on potential long-term improvements (ROP Enhancement Initiative Phase 2) to the NRC's ROP in the areas of: (1) problem identification and resolution; (2) the cross-cutting issues program; (3) radiation protection inspection procedures; (4) the inspection program for Independent Spent Fuel Storage Installation; and (5) the Significance Determination Process, particularly for the emergency preparedness cornerstone. The FRN also welcomed comments on any other areas of the ROP that the staff should consider under this initiative. Southern Nuclear Operating Company (SNC) is pleased to provide this response to the FRN.

Over the past twelve months, SNC has participated as a member of the NEI Reactor Oversight Process Task Force (ROPTF), including participating in fifteen public meetings with the NRC staff to develop proposed enhancements to the twenty-year-old ROP. As discussed in SECY-19-0067, the NRC staff considered twenty years of operating experience and inspection trend data, as well as the recommendations of the ROPTF and suggestions by other NRC internal and external stakeholders to develop the staff's Phase 1 recommendations for enhancing the ROP.

SNC supports the incremental improvements suggested in the SECY, as well as the improvements discussed in the NEI letter of May 20, 2019.² In particular, SNC supports the recommendation in the NEI letter regarding the staff's proposal for changing the treatment of white performance indicators.

SNC commends the NRC for its ROP Enhancement Phase 2 Initiative and endorses the Nuclear Energy Institute's (NEI) comments regarding ROP Enhancement Phase 2 as discussed in its October 7, 2019 response to the FRN. By almost any measure, the safety performance of U.S. commercial nuclear reactors has improved dramatically over the

¹ See SECY-19-0067, "Recommendations for Enhancing the Reactor Oversight Process," dated June 28, 2019.

² ADAMS ML19141A143

twenty years the ROP has been in existence.³ Many of the foundational elements of the ROP continue to evolve through innovation, technology development, and improved understanding of plant risk and operations. SNC supports an approach that treats the ROP as a living program that must continue to keep pace with these advancements in the regulation of the nation's nuclear power plants.

With respect to other areas the staff should consider under this initiative, SNC is in the unique position to provide feedback on the construction ROP (cROP). SNC recommends expanding the ROP enhancement initiative to include a parallel effort to enhance the cROP. SNC would welcome the opportunity to work with the NRC staff and other external stakeholders in a public forum similar to the ROPTF to enhance the cROP and its application for Vogtle 3 and 4 and future new reactor construction projects. This letter contains no NRC commitments.

If you have any questions, please contact Terrence Reis at 205.992.7331.

Respectfully submitted,



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MDM/tr/cg

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³ As explained in referenced NEI letter Uhle to Nieh of May 20, 2019