

From: Rankin, Jennivine
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Subject: Discussion points for 4/16 SNC Public Meeting
Attachments: Vogtle 3_4 Org Structure NRC Question Responses.pdf

Discussion points for 4/16 SNC Public Meeting regarding organizational structure for the final 4-unit Vogtle Site.

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Engineering

Q. Will the 10 CFR 50.59 screening and evaluation process be applied consistently across the entire site? Will there be separate implementing procedures that are substantively different between units 1&2 and 3&4 for implementation of 10 CFR 50.59 requirements?

A. The design change control procedures will be standard across the VEGP 1-4 site. There will be a separate 50.59 procedure for use at Vogtle 3&4 due to the unique aspects of Part 52. The procedures are not substantially different except for unique Part 52 aspects not applicable to Vogtle 1& 2 (e.g., Tier 1 information, Tier 2* information and considerations for ex-vessel severe accidents).

Q. Will the Operating Experience program implementing procedures be substantively different between units 1&2 and 3&4?

A. The Operating Experience procedures will be the same for Vogtle 1-4.

Q. Will the engineering organization structure be separated under different director level management structures?

A. The engineering organization structure will be separate for Vogtle 1&2 and Vogtle 3&4, at least until completing Unit 4's first refueling outage.

Q. Will engineering program implementing procedures be substantively different between units 1 &2 and 3&4.

A. Engineering program procedures will be substantively similar for Vogtle 1-4.

Problem Identification and Resolution

Q. Will there be separate implementation procedures for identifying, evaluating, tracking, and correcting problems and deficiencies between units 1 &2 and 3&4?

A. Vogtle Units 3&4 will continue utilizing its current corrective action procedures with modification to address Operational needs (e.g., Licensed Operator review of new Condition Reports). Differences between the NDQAM and QATR need to be resolved prior to Vogtle 3&4 utilizing the Fleet Corrective Action procedures, which is expected by the end of Vogtle Unit 4's first refueling outage.

Q. Will problem identification and resolution and corrective action program items be tracked by separate databases between units 1 &2 and 3&4?

A. Vogtle Unit 3 will go to the same database as Vogtle 1&2 after hot functional testing is complete. Vogtle Unit 4 will move to the same database as Vogtle 1-3 after Unit 4 hot functional testing is complete.

Q. Will the implementation and monitoring of the safety conscious work environment be a substantively different between units 1&2 and 3&4?

A. The implementation and monitoring of the safety conscious work environment will be substantively similar for Units 1&2 and Units 3&4 after construction is complete on Unit 4.

Fire Protection

Q. Will there be a separate Fire Protection Program between units 1 &2 and 3&4?

A. There will be separate fire protection programs because Vogtle 3&4 is licensed under different fire protection codes and standards than Vogtle 1&2.

Emergency Preparedness

Q. Will there be a separate Emergency Plan between units 1&2 and 3&4?

A. There is a fleet common Standard Emergency Plan applicable to Vogtle 1&2, Vogtle 3&4, Hatch and Farley. There are separate Emergency Plan Annexes for Vogtle 1&2 and Vogtle 3&4 which contain site specific technology specific information.

Q. Will there be a separate emergency response organization between units 1 &2 and 3&4?

A. There will be separate EROs with separate Technical Support Centers and Operations Support Centers until the timeframe of the 1st Unit 4 refueling outage. At that point we will integrate the EROs to respond from a single common site TSC and OSC.

Q. Will there be separate public alert and notification systems between units 1&2 and 3&4?

A. The public alert and notification system is the same for Vogtle 1&2 and Vogtle 3&4.

Q. Will emergency exercises be required to be performed separately between units 1&2 and 3&4?

- A. The emergency exercises will be separate for Vogtle 1&2 and Vogtle 3&4 and will be re-evaluated when the Vogtle 1&2 and Vogtle 3&4 EROs will fully integrate in a single common site TSC and OSC when the 1st Unit 4 refueling outage occurs.

Q. Will the emergency preparedness organization structure be separated under different manager level organizational structures?

- A. The emergency preparedness organization for Vogtle 1&2 and Vogtle 3&4 will be separate until full ERO integration occurs, and will report up through the Regulatory Affairs Manager for the respective units.

Radiation Protection

Q. Will there be a combined dosimetry office between units 1&2 and 3&4?

- A. Initially the dosimetry offices will be separate. The current plan for integration would be after the first refueling outage for Unit-4.

Q. Will the radiation protection organization structure be separated under different manager level organizational structures?

- A. There will two RP Managers; one for Units 1&2 and one for Units 3&4 through Unit-4 first refueling outage.

Q. Will radiation protection implementing procedures be substantively different between units 1&2 and 3&4?

- A. The procedures will not be substantively different. Vogtle Units 1&2 and 3&4 will use some of the same procedures however, there will be some Unit 3&4 specific procedures.

Q. Will there be common facilities and materials between units 1&2 and 3&4 for process, storage, transport, or calibration of radiation protection material or assets?

- A. Those will come as the site integrates however a final plan for common facilities and materials has not been determined. Calibration and respiratory will be common. As with the preceding questions most if not all of this will be done after the first refueling on Unit-4.

Security

Q. Will there be separate and independent protected areas between 1&2 and 3&4 resulting in separate intrusion detection equipment maintenance and testing programs and protective strategy implementation programs?

A. No, there will be a common Vogtle 1-4 protected area with a single Central and Secondary Alarm Station to include a common protective strategy implementation program.

Q. Will there be multiple personnel, vehicle, and material access entry points between units 1&2 and 3&4?

A. Yes, the Vogtle units 1&2 personnel, vehicle, and warehouse material entry points will be maintained in addition to the new Vogtle 3&4 personnel, vehicle, and warehouse material entry points. (a business decision will be made at a later date as to how long the Vogtle 1&2 access points will remain active)

Q. Will there be separate access authorization or fitness for duty programs between 1&2 and 3&4?

A. No, there will be a common Vogtle 1-4 access authorization and FFD program.