



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

April 27, 2020

MEMORANDUM TO: Victor E. Hall, Chief
Vogtle Project Office
Office of Nuclear Reactor Regulation

FROM: Jennivine Rankin, Project Manager */RA/*
Vogtle Project Office
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR
OPERATING COMPANY ON APRIL 16, 2020

The U.S. Nuclear Regulatory Commission (NRC) staff held a Category 1 public meeting with Southern Nuclear Operating Company (SNC) on April 16, 2020. The purpose of the meeting was to discuss the organizational structure of the final 4-unit Vogtle site and crediting previous emergency preparedness (EP) exercises to satisfy inspections, tests, analyses, and acceptance criteria (ITAAC).

The meeting notice can be found in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML20071D456. 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 presentation slides associated with the meeting can be found at ADAMS Accession No. ML20094L559.

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Summary of Meeting:

Organizational Structure of the Final 4-Unit Vogtle Site

On April 16, 2020, staff from the NRC conducted a public meeting with representatives from SNC to discuss the organizational structure of the final 4-unit Vogtle Site. The purpose of this meeting was for the NRC staff to gain additional information to inform future development of inspection plans and maximize inspection resources. Prior to the public meeting, SNC had submitted responses to NRC questions regarding organization structure. The responses can be found under ADAMS Accession No. ML20094L559. Specific highlights from the discussion are described below:

- SNC clarified that the integration of common programs into site wide programs expected at the end of Unit 4's first refueling outage is a site goal and could change as conditions change.
- SNC clarified that following full integration of the Emergency Preparedness programs, Units 1/2 and Units 3/4 will share a common Technical Support Center and Operations Support Center. However, due to the differences in plant technology, the Emergency Response Organizations and Emergency Plan Annexes will remain separate.
- SNC clarified that Units 1/2 and Units 3/4 have different fire protection requirements. Therefore, fire protection plans, staffing, and organizational structure will be separate. SNC noted that there are some shared administrative procedures between the 4 units. Examples include procedures for hot work and transient combustibles.

At the conclusion of the discussion, there was an opportunity for the public to provide comments and ask questions. There were no comments or questions from the public.

Crediting Previous EP Exercises to Satisfy ITAAC

On April 16, 2020, staff from the NRC conducted a public meeting with representatives from SNC to discuss crediting previous EP exercises to satisfy ITAAC No. 872. Due to the current public health crisis, States within the Vogtle site EP zone have formally requested that the previously scheduled May 2020 biennial exercise for Vogtle Units 1 and 2 be postponed, to a date to be determined. Notable highlights from the discussion are described below:

- SNC intended to use the planned May 2020 biennial exercise for Units 1 and 2 to demonstrate offsite objectives needed to support closure of ITAAC No. 872.
- NRC staff clarified ambiguity in the regulatory language identified in Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Appendix E, Section IV.F.2.a. The language in this section appears to use the terms "every or within 2 years" to describe licensee exercise requirements while using the term "biennial" to describe the demonstration frequency for offsite exercise objectives by States and local response organizations. This ambiguity was previously addressed in Regulatory Issue Summary (RIS) 2006-03, "Guidance on Requesting an Exemption from Biennial Emergency Preparedness Exercise Requirements," (ADAMS Accession No. ML053390039) which was issued in an attempt to clarify this inconsistency in regard to exercise rescheduling and defines the term "biennial." Based on the staff's interpretation in the RIS, and past agency practice interpreting the regulation in this manner, the term "within/every 2 years" can be interpreted as "biennial" frequency defined in RIS 2006-03, which states, in part:

[T]he NRC has allowed licensees the flexibility to schedule their exercises at any time during the biennial calendar year. This provides a 13 to 35-month window to schedule exercises while still meeting the biennial requirement. A one-time change in the exercise schedule increases the interval between biennial exercises, but, in most cases the postponed exercise still falls within the 35-month window, thus meeting the intent of the regulation.

- NRC staff suggested that SNC should consider comparing the offsite objectives identified for demonstration during the planned May 2020 exercise with those actually demonstrated during the previous May 18, 2018 exercise to verify that all required offsite objectives were successfully demonstrated and that no Federal Emergency Management Agency (FEMA) identified deficiencies exist.
- NRC staff also emphasized that SNC should discuss with States and local response organizations their proposal to close ITAAC No. 872 against the existing offsite program using the successful demonstration of offsite objectives during the May 18, 2018 exercise. NRC staff indicated that they would be discussing ITAAC closure with FEMA Headquarters (Technological Hazards Division) once the ITAAC Closure Notification is received.
- SNC indicated that the ITAAC No. 872 closure notification was likely going to be based on the May 18, 2018 exercise with some clarifications. SNC indicated they intend to submit the closure notification in late April or early May 2020.

At the conclusion of the discussion, there was an opportunity for the public to provide comments and ask questions. There were no comments or questions from the public.

Docket Nos.: 52-025
52-026

Enclosures:
As stated

cc w/encls: See next page

SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR OPERATING COMPANY
ON APRIL 16, 2020 DATED: April 27, 2020

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ADAMS Accession No.: ML20108E933

***via e-mail**

NRC-001

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**AGENDA FOR PUBLIC MEETING
U.S. NUCLEAR REGULATORY COMMISSION (NRC)
Thursday, April 16, 2020
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
10:10 a.m.	Discussion of Identified Topics	NRC/SNC
	Opportunity for Public Comment	NRC/Public
	Open Portion Concludes	

<u>CLOSED</u>	(If needed)	NRC/SNC
12:00 p.m.	Adjourn	

PUBLIC MEETING
U.S. NUCLEAR REGULATORY COMMISSION
 Thursday, April 16, 2020
 Teleconference
 9:00 a.m. – 12:00 p.m.

List of Attendees

Name	Organization
Representing the Nuclear Regulatory Commission	
Jennie Rankin Tanny Santos Vic Hall Mike King Chandu Patel Chris Welch Evan Davidson Andrea Johnson Alina Schiller Jim Gaslevic	NRR/VPO
Joe Anderson Dan Barss Kenneth Mott Bruce Musico	NSIR
Jeffrey Bream Stephen Campbell Tom Hipschman	NRR/DRO
Jody Martin	OGC
Marissa Bailey Bradley Davis Edwin Lea Jonathan Montgomery John Pelchat	Region II
Steve Ruffin	OEDO

Representing Industry	
Stephanie Agee Amy Chamberlain Bob Beilke John Hall Rick Collings Jason Weathersby Nick Kellenberger Kelli Roberts Ralph Calia Mark Humphrey Jennifer Harrel Key Warren Michael Long Ryan Henderson Steve Leighty Adam Quarles	Southern Nuclear Operating Company

Note: All participated via teleconference.

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cc:

(Revised 4/7/2020)

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