

May 22, 2020

NL-20-0620

To: John G. Lamb, Senior Project Manager

Cc: Document Control Desk

Michael T. Markley, Branch Chief

Peter Meier, Senior Resident Inspector – Joseph M. Farley Nuclear Plant

Mark Schweg, Acting Senior Resident Inspector – Edwin I. Hatch Nuclear Plant

Chris Safouri, Acting Senior Resident Inspector – Vogtle Electric Generating Plant

Reference: NRC Letter from H. Nieh and J. Lubinski to NEI, "U.S. Nuclear Regulatory Commission Planned Actions Related to Certain Fire Protection Requirements for Operating and Decommissioning Reactor Licensees During the Coronavirus Disease 2019 Public Health Emergency," May 14, 2020 [ADAMS Accession Number ML20122A022]

As a result of the Coronavirus Disease 2019 (COVID-19) public health emergency (PHE), Southern Nuclear Operating Company (SNC) has determined that certain requirements of 10 CFR 50.48, Fire Protection, would likely conflict with practices recommended by the Centers for Disease Control and Prevention (CDC) to limit the spread of COVID-19. SNC therefore requests a temporary exemption from the Quarterly Fire Brigade Drills and Annual Live Fire Fighting Training requirements of the regulation. This exemption is necessary to help maintain CDC recommendations related to social distancing, worker screening, and limiting close-proximity work. By leveraging the alternative fire protection measures described below, SNC is taking steps to support both plant worker and neighboring community safety to limit the spread of the COVID-19 virus.

As the U.S. Departments of Homeland Security and Energy have stated in their guidance, the electric grid and nuclear plant operation make up the nation's critical infrastructure similar to the medical, food, communications, and other critical industries. Joseph M. Farley Nuclear Plant Units 1 and 2 (FNP), Edwin I. Hatch Nuclear Plant Units 1 and 2 (HNP), and Vogtle Electric Generating Plant Units 1 and 2 (VEGP) operations must be conducted such that the plants are available when needed, including during the critical peak summer loads.

Quarterly Fire Brigade Drills

SNC is requesting a temporary exemption to the FNP, HNP, and VEGP quarterly fire brigade drill requirements. Specifically, SNC has determined that FNP, HNP, and VEGP cannot meet the quarterly requirement of its fire protection programs without workers taking actions that may be contrary to CDC's guidance for responding to the COVID-19 PHE.

The fire protection licensing bases are described in the following document(s).

FNP:

1. Joseph M. Farley Nuclear Plant, Units 1 and 2 – Issuance of Amendment Regarding Transition to a Risk-Informed, Performance-Based Fire Protection Program in Accordance with 10 CFR 50.48(c) (TAC Nos. ME9741 and ME9742), 03/10/2015, ML14308A048

HNP:

1. Edwin I. Hatch Nuclear Plant, Units 1 and 2 – License Amendment Revision to Fire Protection License Conditions to Provide Consistency with NRC Generic Letter 86-10, 11/24/1986, ML012960367

VEGP:

1. NUREG-1137 “Safety Evaluation Report related to the operation of Vogtle Electric Generating Plant, Units 1 and 2”, Section 9.5.1 “Fire Protection”, June 1985

SNC will change its fire brigade drill program to provide means other than typical face-to-face, close-quarter drills for training and evaluations of brigade members during the exemption period. The changes include:

1. Tabletop drills.
2. Review of tabletop drill critiques with the entire fire brigade to share crew learnings.
3. Fire Brigade leadership observations and reinforcement of fire protection fundamentals during the alternative process.

Annual Live Fire Fighting Training

SNC is requesting a temporary exemption to the FNP, HNP, and VEGP annual live fire fighting exercise requirements. Specifically, SNC has determined that FNP, HNP, and VEGP cannot meet the annual live fire fighting training requirement of its fire protection programs without workers taking actions that may be contrary to CDC’s guidance for responding to the COVID-19 PHE. Additionally, the local live fire exercise facilities are unavailable due to the impact of COVID-19 PHE.

The facilities used to conduct live fire-fighting training are unable to staff critical positions to provide, or support, training due to the COVID-19 PHE. SNC will work with the live fire facilities to reschedule the annual live fire exercises as soon as practical after the PHE has ended.

FNP last performed the annual live fire exercises for crews 1-5 on the following dates, respectively: 06/27/2019, 11/15/2019, 02/18/2019, 08/15/2019, and 11/07/2019. The associated annual requirements will not be met on date 12/31/2020.

HNP last performed the annual live fire exercises for crews A-E on the following dates, respectively: 10/02/2019, 11/20/2019, 06/26/2019, 05/09/2019, and 08/12/2019. The associated annual requirements will not be met on date 12/31/2020.

VEGP last performed the annual live fire exercises for shifts 1-5 on the following dates, respectively: 12/12/2019, 10/17/2019, 12/19/2019, 12/05/2019, and 10/24/2019. The associated annual requirements will not be met on date 12/31/2020.

SNC will change its FNP, HNP, and VEGP live fire exercise programs to provide for training and evaluations of brigade members’ knowledge, skills, and abilities without the conduct of live fire fighting training during the exemption period. The changes include:

1. Computer based training (for firefighting fundamentals)
2. Observation and reinforcement of fire protection fundamentals
3. Tabletop drills
4. Review of tabletop drill critiques with the entire fire brigade to share crew learnings.
5. Review of previous drill critique reports and training assessments.

SNC will, for the duration of any exemption approved by NRC, apply a station-specific process to manage affected personnel, while ensuring the safety of site workers.

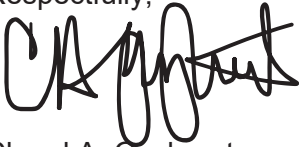
SNC will limit this exemption to FNP, HNP, and VEGP personnel having prior experience with the activity to which they will be assigned.

SNC will restore FNP, HNP, and VEGP compliance to the quarterly fire brigade drill requirements within 90 days of termination of the PHE or December 31, 2020, whichever occurs first. SNC will restore FNP, HNP, and VEGP compliance to annual live fire fighting exercise requirements within 365 days of termination of the PHE, or by December 31, 2021, whichever occurs first.

SNC has determined that special circumstance exists per 10 CFR 50.12(a)(2)(v). The exemption would provide only temporary relief from the applicable regulation, and SNC has made good faith efforts to comply with the regulation.

SNC requests approval of this temporary exemption request by no later than 06/02/2020. The exemption will be implemented by 06/03/2020, at which time the station-specific processes will take effect.

Respectfully,

A handwritten signature in black ink, appearing to read 'Cheryl A. Gayheart', written in a cursive style.

Cheryl A. Gayheart
Regulatory Affairs Director
Southern Nuclear Operating Company