



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

June 1, 2020

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

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

SUBJECT: SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR
OPERATING COMPANY ON MAY 21, 2020

The U.S. Nuclear Regulatory Commission (NRC) staff held a Category 1 public meeting with Southern Nuclear Operating Company (SNC) on May 21, 2020. The purpose of the meeting was to discuss Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Index No. 201 regarding in-containment refueling water storage tank (IRWST) drain line flow resistance testing and the proposed alternative requirements for acceptance of preservice inspection (PSI) volumetric examination flaws for Vogtle Electric Generating Plant (VEGP) Units 3 and 4.

The meeting notice can be found in the Agencywide Documents Access and Management System (ADAMS) Accession No. ML20104A014. 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 other documents referenced during the discussion can be found at the ADAMS Accession Nos. given below:

• ITAAC Closure Notification on Completion of ITAAC 2.2.03.09a.i [Index No. 201]	ML20132A159
• ITAAC Index Nos. 180 and 201 Resistance Flowpath Drawings	ML20139A084
• Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load Item 2.2.03.09a.i [Index No. 201]	ML18120A282
• Draft Proposed Alternative for Requirements for PSI Acceptance of Volumetric Examinations	ML20136B345

CONTACT: Jennivine Rankin, NRR/VPO
(301) 415-1530

Summary of Meeting:ITAAC Closure Notification for ITAAC 2.2.03.09a.i [Index Number 201]

On May 21, 2020, staff from the NRC conducted a public meeting with representatives from SNC to discuss the ITAAC closure notification (ICN) for Index No. 201 regarding IRWST drain line flow resistance testing. During review of the ICN, the staff had questions regarding differences between the ICN and the associated Uncompleted ITAAC Notification (UIN). SNC clarified the following:

- The ICN discussed a jumper between the A and B containment sump injection lines that was not discussed in the UIN. The reason for the jumper is to prevent flooding of containment during the test. SNC indicated that the added jumper, as shown on the provided diagrams, does not affect the measured flow resistance required by the ITAAC.
- The ICN discussed a temporary valve in the IRWST screen drain lines while the UIN discussed use of a compression plug. SNC explained that the use of a temporary valve was more convenient than a plug to isolate the two trains.
- SNC also confirmed that similar testing of ITAAC Index No. 180 used each parallel line into and out of the sump, even though the provided diagrams only show a single line in and out of the sump.

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.

Proposed Alternative Requirements for Acceptance of Preservice Inspection Volumetric Examination Flaws

On May 21, 2020, staff from the NRC conducted a public meeting with representatives from SNC to discuss proposed alternative requirements for acceptance of PSI volumetric examination flaws. The NRC staff reviewed the draft request and provided the following items for SNC to consider:

- Clarify the interval dates and duration of the proposed alternative to recognize its use during PSI prior to the 10 CFR 52.103(g) finding for each unit and potentially for the first inservice inspection interval (ISI) based on subsequent inspection requirements.
- Add applicable edition and addenda of the American Society of Mechanical Engineers (ASME) Code Section III to the applicable code edition and addenda section for completeness. In addition, the proposed alternative and basis section should include Section III because it requires that either Section XI be met or a repair be performed. In lieu of performing a repair, a flaw evaluation using the 2017 Edition of the ASME Section XI acceptance standards in IWB/IWC is being proposed. The NRC staff noted that the ASME Code Section III requirement for PSI, such as NB-5282, requires components whose volumetric examination reveals flaws that exceed the standards of IWB-3500 are not acceptable for service and shall be repaired, which differs from the alternative being requested.
- Further define the scope of the ASME Code components affected. One method would be to include all applicable systems and weld categories using specific categories from the ASME Code.
- Further limit the use of the proposed alternative. The NRC staff expressed concern that the draft proposed alternative is generically applicable to flaws found in all future PSI

inspections for Units 3 and 4. This could result in a potentially large number of welds having flaws that are 75% through wall which could reduce the structural margin and thereby challenge the structural integrity of the safety related Class 1 and 2 welds in a reactor plant with no operating experience. This was discussed in the NRC staff's disapproval of the use of Code Case N-813 for PSI in Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1," and disapproval of IWB/IWC-3600 for PSI in the rulemaking for the 2015 and 2017 Editions of the ASME Code.

- Review the re-examination requirements (sampling and timing) of flaws that are evaluated and accepted by this proposed alternative. The current proposal only requires one reexamination on one weld in an interval, and this is not sufficient to verify that all flaws in all of the welds will not grow after the first period. Only performing reexamination towards the end of the first interval, in lieu of the first, second and third period of the first interval may allow the flaw to grow to unacceptable dimensions before this re-examination. The re-examination requirements should take into consideration that this is a generic application of IWB-3600 on a new plant design with no operating experience.

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 MAY 21, 2020 DATED: JUNE 1, 2020

DISTRIBUTION:

PUBLIC	VHall, NRR
RidsOpaMail	RidsAcrsAcnwMailCenter
RidsOgcMailCenter	CSantos, NRR
RidsRgn2MailCenter	JHoncharik, NRR
NRR_VPO Distribution	

ADAMS Accession No.: ML20148M138

***via e-mail**

NRC-001

OFFICE	PM: NRR/VPO	LA: NRR/VPO	PM: NRR/VPO	BC: NRR/VPO:BC
NAME	JRankin* (c)	RButler*	CSantos*	VHall*
DATE	5/29/2020	5/29/2020	5/29/2020	5/29/2020
OFFICE	PM: NRR/VPO			
NAME	JRankin (s)			
DATE	6/1/2020			

OFFICIAL RECORD COPY

**AGENDA FOR PUBLIC MEETING
U.S. NUCLEAR REGULATORY COMMISSION (NRC)
Thursday, May 21, 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
9:10 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, May 21, 2020
Teleconference
9:00 a.m. – 12:00 p.m.

List of Attendees

Name	Organization
Representing the Nuclear Regulatory Commission	
Jennie Rankin Tanny Santos Victor Hall Chris Welch Billy Gleaves Jim Gaslevic	NRR/VPO
Matt Mitchell John Honcharik	NRR/DNRL
Alain Artayet	RII/DCO
Representing Industry	
Curtis Castell Kyle Caver Mark Humphrey Garrett Godbee Amy Chamberlain Tom Petrak Adam Quarles Justin Sciulli Kelli Roberts Warren Bamford Mark Wilson	Southern Nuclear Operating Company
Jason Hurst Brian Schleger	Westinghouse Electric Company

Note: All participated via teleconference.

Vogtle Mailing List

(Revised 4/7/2020)

cc:

Resident Manager
Oglethorpe Power Corporation
Alvin W. Vogtle Nuclear Plant
7821 River Road
Waynesboro, GA 30830

Resident Inspector
Vogtle Plant Units 3 & 4
8805 River Road
Waynesboro, GA 30830

Office of the Attorney General
40 Capitol Square, SW
Atlanta, GA 30334

Mr. Barty Simonton
Team Leader
Environmental Radiation Program
Air Protection Branch
Environmental Protection Division
4244 International Parkway, Suite 120
Atlanta, GA 30354-3906

Southern Nuclear Operating Company
Document Control Coordinator
3535 Colonnade Parkway
Birmingham, AL 35243

Brian H. Whitley
Regulatory Affairs Director
Southern Nuclear Operating Company
3535 Colonnade Parkway, BIN N-226-EC
Birmingham, AL 35243

Anne F. Appleby
Oglethorpe Power Corporation
2100 East Exchange Place
Tucker, GA 30084

Mr. Michael Yox
Site Regulatory Affairs Director
Vogtle Units 3 & 4
7825 River Road, Building 302 (ESB)
Bin 6031
Waynesboro, GA 30830

County Commissioner
Office of the County Commissioner
Burke County Commission
Waynesboro, GA 30830

Mr. Wayne Guilfoyle
Commissioner District 8
Augusta-Richmond County Commission
4940 Windsor Spring Rd
Hephzibah, GA 30815

Gwendolyn Jackson
Burke County Library
130 Highway 24 South
Waynesboro, GA 30830

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
Atlanta, GA 30334

Vogtle Mailing List

Email

aagibson@southernco.com (Amanda Gibson)
acchambe@southernco.com (Amy Chamberlian)
gam@nei.org (Gia Montserrat)
Lindsay@georgiawand.org (Lindsay Harper)
bhwhitley@southernco.com (Brian Whitley)
Bill.Jacobs@gdsassociates.com (Bill Jacobs)
corletmm@westinghouse.com (Michael M. Corletti)
crpierce@southernco.com (C.R. Pierce)
dahjones@southernco.com (David Jones)
david.hinds@ge.com (David Hinds)
david.lewis@pillsburylaw.com (David Lewis)
dlfulton@southernco.com (Dale Fulton)
ed.burns@earthlink.net (Ed Burns)
edavis@pegasusgroup.us (Ed David)
G2NDRMDC@southernco.com (SNC Document Control)
George.Taylor@opc.com (George Taylor)
harperzs@westinghouse.com (Zachary S. Harper)
james1.beard@ge.com (James Beard)
JHaswell@southernco.com (Jeremiah Haswell)
jim@ncwarn.org (Jim Warren)
John.Bozga@nrc.gov (John Bozga)
Joseph_Hegner@dom.com (Joseph Hegner)
karlg@att.net (Karl Gross)
kmstacy@southernco.com (Kara Stacy)
kroberts@southernco.com (Kelli Roberts)
KSutton@morganlewis.com (Kathryn M. Sutton)
kwaugh@impact-net.org (Kenneth O. Waugh)
markus.popa@hq.doe.gov (Markus Popa)
mdmeier@southernco.com (Mike Meier)
media@nei.org (Scott Peterson)
Melissa.Smith@Hq.Doe.Gov (Melissa Smith)
mike.price@opc.com (M.W. Price)
MKWASHIN@southernco.com (MKWashington)
mphumphr@southernco.com (Mark Humphrey)
MSF@nei.org (Marvin Fertel)
nirsnet@nirs.org (Michael Mariotte)
Nuclaw@mindspring.com (Robert Temple)
Paul@beyondnuclear.org (Paul Gunter)
pbessette@morganlewis.com (Paul Bessette)
ppsena@southernco.com (Peter Sena, III)
r.joshi15@comcast.net (Ravi Joshi)
rwink@ameren.com (Roger Wink)
sabinski@suddenlink.net (Steve A. Bennett)
Michelle@cleanenergy.org (Michelle Powell)

Vogle Mailing List

sblanton@balch.com (Stanford Blanton)
Shiva.Granmayeh@hq.doe.gov (Shiva Granmayeh)
sjackson@meagpower.org (Steven Jackson)
sjones@psc.state.ga.us (Shemetha Jones)
skauffman@mpr.com (Storm Kauffman)
sleighty@southernco.com (Steve Leighty)
sroetger@psc.state.ga.us (Steve Roetger)
syagee@southernco.com (Stephanie Agee)
TomClements329@cs.com (Tom Clements)
Vanessa.quinn@dhs.gov (Vanessa Quinn)
vcsummer2n3@gmail.com (Brian McIntyre)
wayne.marquino@gmail.com (Wayne Marquino)
weave1dw@westinghouse.com (Doug Weaver)
William.Birge@hq.doe.gov (William Birge)
X2edgran@southernco.com (Eddie R. Grant)
X2hagge@southern.com (Neil Haggerty)
X2dwwill@southernco.com (Daniel Williamson)