

May 27, 2020

NL-20-0640

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

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

By email dated May 22, 2020, Southern Nuclear Operating Company (SNC) submitted exemption requests for the Joseph M. Farley Nuclear Plant (Farley), Units 1 and 2; Edwin I. Hatch Nuclear Plant (Hatch), Units 1 and 2; and Vogtle Electric Generating Plant (Vogtle), Units 1 and 2 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20143A253). The exemption requests are related to the quarterly fire brigade drills and the annual live fire fighting training.

By email dated May 27, 2020, the U.S. Nuclear Regulatory Commission (NRC) staff notified SNC that additional information is needed for the staff to complete their detailed technical review. A clarification call was held between the NRC staff and SNC personnel on May 27, 2020 to discuss the NRC staff requests. Based on this clarification call, SNC is withdrawing the exemption request for Vogtle Units 1 and 2 related to quarterly fire brigade drills and annual live fire fighting training. The SNC response to the May 27, 2020 NRC email request is provided below. Accordingly, the SNC response is for Farley Units 1 and 2 and Hatch Units 1 and 2 only.

NRC RAI – 1.

The regulation Title 10 of the Code of Federal Regulations (10 CFR) 50.12, “Specific exemptions,” states: “The Commission may, upon application by any interested person or upon its own initiative, grant exemptions from the requirements of the regulations of this part, which are—”

Hatch, Units 1 and 2, are licensed under Appendix R. Identify which requirements in Appendix R SNC is requesting exemptions from for the quarterly fire brigade drills and annual live fire fighting training.

Farley, Units 1 and 2, are licensed under National Fire Protection Association (NFPA) 805, “Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants, 2001 Edition. Identify which requirements in NFPA 805 SNC is requesting exemptions from for the quarterly fire brigade drills and annual live fire fighting training.

Vogtle, Units 1 and 2, are licensed under Branch Technical Position (BTP) Chemical Engineering Branch (CMEB) 9.51 under SER (NUREG-1137) through Supplement 5. The Vogtle Fire Protection license condition states: “Southern Nuclear shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility, and submittals dated July 2, August 4 and 13, October 10 and

24, November 5, and December 19, 1986, and January 2, 1987, as approved in the SER (NUREG-1137) through Supplement 5 subject to the following provision: Southern Nuclear may make changes to the approved fire protection program without prior approval of the Commission, only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.” Identify which requirement SNC is seeking an exemption from for the quarterly fire brigade drills and annual live fire fighting training. Explain the process SNC followed that resulted in determining that an exemption is appropriate for Vogtle, rather than self-approval per Vogtle’s fire protection license condition, or a license amendment request.

SNC Response to RAI – 1.

Hatch Units 1 and 2:

Quarterly Fire Brigade Drills: Appendix R to Part 50, Specific Requirement III.I.3.b

Annual Live Fire Training: Appendix R to Part 50, Specific Requirement III.I.2.

Farley Units 1 and 2:

Quarterly Fire Brigade Drills: NFPA-805 Section 3.4.3(a)(1) requirements pertaining to NFPA-600 Chapter 6, Specific Requirement 6.2.2 and requirements pertaining to NFPA-600 Chapter 7, Specific Requirement 7.2.2

Annual Live Fire Training: NFPA-805 Section 3.4.1(a)(1) requirements pertaining to NFPA-600 Chapter 6, Specific Requirement 6.2.3 and requirements pertaining to NFPA-600 Chapter 7, Specific Requirement 7.2.3

Vogtle Units 1 and 2:

SNC is withdrawing the exemption request for Vogtle Units 1 and 2 related to quarterly fire brigade drills and annual live fire fighting training.

NRC RAI – 2.

In the letter dated May 22, 2020, SNC stated: “The facilities used to conduct live fire fighting training are unable to staff critical positions to provide, or support, 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.” Indicate, which, if any of the SNC plants have the capability to perform live fire fighting training onsite. State which practices recommended by the Center for Disease Control and Prevention (CDC) to limit the spread of Coronavirus Disease 2019 (COVID-19) would prevent SNC from performing live fire fighting training onsite.

SNC Response to RAI – 2.

Hatch Units 1 and 2:

Hatch has onsite facilities where live fire fighting training is routinely conducted. The inability to conduct live fire fighting training is primarily based on the unavailability of the offsite resources (e.g., ambulance, emergency medical technicians, and adjunct fire instructors based on NFPA code requirements for safety) due to the PHE declared by the U.S. Department of Health and Human Services. In addition, the Southern Company Responsible Reentry Playbook incorporates the latest CDC guidelines as well as federal, state, and local guidance to help ensure the protection of our critical personnel, which includes the operations staffed fire brigade.

For Hatch Units 1 and 2 fire brigade personnel, the April 2020 and May 2020 annual live fire fighting training classes were canceled based on the Appling County EMS notifications that the agency would not be able to support these classes. SNC continues to work with Appling County EMS to obtain the necessary support to perform the annual live fire fighting training.

Farley Units 1 and 2:

Farley must conduct live fire fighting training offsite, at a facility not owned nor operated by SNC. The inability to conduct live fire fighting training is primarily due to the fire fighting training facility availability. In addition, the Southern Company Responsible Reentry Playbook incorporates the latest CDC guidelines as well as federal, state, and local guidance to help ensure the protection of our critical personnel, which includes the operations staffed fire brigade.

For Farley Units 1 and 2 fire brigade personnel, the March 2020 and April 2020 annual live fire fighting training classes were canceled by the City of Dothan, Alabama - Wiregrass Public Safety Center, where Farley's live fire fighting training is conducted and provided with the necessary support. At this time, live fire fighting schools in Alabama are closed due to the COVID-19 virus. SNC is in regular contact with the City of Dothan's Wiregrass Public Safety Center. The latest communication indicated the availability of the fire fighting schools and necessary support will be reassessed in early July.

Vogtle Units 1 and 2:

SNC is withdrawing the exemption request for Vogtle Units 1 and 2 related to quarterly fire brigade drills and annual live fire fighting training.

NRC RAI – 3.

Provide the dates that each unit will be out of compliance with the regulations for quarterly fire brigade drills.

SNC Response to RAI – 3.

Hatch Units 1 and 2:

Hatch fire brigades will be out of compliance going beyond June 30, 2020 for quarterly fire brigade drills. Please note, however, that in order for Hatch personnel to complete the quarterly

fire brigade drills by June 30, 2020, the first drill would commence on June 4, 2020 due to rotating shift schedules.

Farley Units 1 and 2:

Farley fire brigades will be out of compliance going beyond June 30, 2020 for quarterly fire brigade drills. Please note, however, that in order for Farley personnel to complete the quarterly fire brigade drills by June 30, 2020, the first drill would commence on June 15, 2020 due to rotating shift schedules.

Vogtle Units 1 and 2:

SNC is withdrawing the exemption request for Vogtle Units 1 and 2 related to quarterly fire brigade drills and annual live fire fighting training.

NRC RAI – 4.

SNC is requesting the fire protection exemptions by June 2, 2020; however, the letter states for the annual live fire fighting training: “The associated annual requirements will not be met on 12/31/2020.” For each plant, provide the dates when it will no longer be in compliance with the particular requirement.

SNC Response to RAI – 4.

Hatch Units 1 and 2:

Hatch fire brigades will be out of compliance going beyond December 31, 2020 for annual live fire fighting training. (Please note that the “annual” requirements are to conduct the training once in a calendar year. Therefore, there may be more than 365 days between live fire fighting training for various fire brigade crews.) As discussed in the May 22, 2020 request, SNC will implement an alternative training process to provide for training and evaluations of fire brigade members’ knowledge, skills, and abilities without the conduct of live fire fighting training if required based on the unavailability of Appling county EMS support. Due to (1) the number of crews and training schedules, (2) the amount of material required to be developed and covered, and (3) the future impacts of a potential resurgence of COVID-19, SNC must begin the alternative training process in a timely manner to meet the requirements to conduct the training by December 31, 2020.

Farley Units 1 and 2:

Farley fire brigades will be out of compliance going beyond December 31, 2020 for annual live fire fighting training. (Please note that the “annual” requirements are to conduct the training once in a calendar year. Therefore, there may be more than 365 days between live fire fighting training for various fire brigade crews.) As discussed in the May 22, 2020 request, SNC will implement an alternative training process to provide for training and evaluations of fire brigade members’ knowledge, skills, and abilities without the conduct of live fire fighting training if required based on the unavailability of the City of Dothan’s Wiregrass Public Safety Center. Due to (1) the number of crews and training schedules, (2) the amount of material required to be

developed and covered, and (3) the future impacts of a potential resurgence of COVID-19, SNC must begin the alternative training process in a timely manner to meet the requirements to conduct the training by December 31, 2020.

Vogtle Units 1 and 2:

SNC is withdrawing the exemption request for Vogtle Units 1 and 2 related to quarterly fire brigade drills and annual live fire fighting training.

Respectfully,

A handwritten signature in black ink, appearing to read 'Cheryl A. Gayheart', with a long horizontal stroke extending to the right.

Cheryl A. Gayheart

Regulatory Affairs Director

Southern Nuclear Operating Company