



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

October 27, 2020

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

SUBJECT: VOGTLE ELECTRIC GENERATING PLANT, UNITS 3 AND 4 — STAFF  
EVALUATION REGARDING IMPLEMENTATION OF MITIGATING STRATEGIES  
RELATED TO ORDER EA-12-049 (EPID L-2020-LRQ-0002)

Dear Mr. Whitley:

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued Order EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," (Agencywide Documents Access and Management System Accession No. ML12054A736). This order directed licensees to develop, implement, and maintain guidance and strategies to maintain or restore core, containment, and spent fuel pool cooling capabilities in the event of a beyond design basis external event. Order EA-12-049 applies to all power reactor licensees and all holders of construction permits for power reactors.

By letter dated August 22, 2013, Southern Nuclear Operating Company (SNC) submitted an overall integrated plan (OIP) for Vogtle Electric Generating Plant (VEGP) Units 3 and 4 in response to Order EA-12-049 (ADAMS Accession No. ML13235A260). Between February 2014 and August 2020, SNC submitted 14 six-month status reports as required by Section IV.C.2 of the Order. During a June 12, 2019, Category 1 public meeting (ADAMS Accession No. ML19171A022), SNC and the NRC staff discussed SNC's proposed plan for implementation of EA-12-049 and the associated title 10 of the *Code of Federal Regulations* (10 CFR) 50.155 rulemaking for VEGP Units 3 and 4. As discussed with the NRC staff during this public meeting, SNC provided an updated OIP, in a format similar to that of the final integrated plan (FIP) for the SNC fleet, in a letter dated May 15, 2020 (ADAMS Accession No. ML20136A453). The updated OIP supplements and expands on the August 22, 2013 OIP submittal and contains guidance on VEGP Units 3 and 4 compliance with NRC Order EA-12-049 requirements.

The enclosed staff evaluation provides the results of the NRC staff's review of SNC's strategies for VEGP Units 3 and 4. The intent of this interim staff evaluation is to inform SNC on whether or not their integrated plan, if implemented as described, provides a reasonable path

for compliance with the order. For areas where the NRC staff has insufficient information to make the finding the staff may review these areas as they become available or address them as part of the inspection process.

Sincerely,

*/RA/*

Cayetano Santos Jr., Project Manager  
Vogtle Project Office  
Office of Nuclear Reactor Regulation

Docket Nos.: 52-025  
52-026

Enclosure  
Staff Evaluation

cc: See next page

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**ADAMS Accession No.: ML20269A399**

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**\*via e-mail**

**NRR-106**

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