



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

November 5, 2020

MEMORANDUM TO: Omar López-Santiago, Chief  
Vogtle Project Office  
Office of Nuclear Reactor Regulation

FROM: Alina Schiller, Project Manager */RA/*  
Vogtle Project Office  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR  
OPERATING COMPANY ON OCTOBER 22, 2020

The U.S. Nuclear Regulatory Commission (NRC) staff held a Category 1 public meeting with Southern Nuclear Operating Company (SNC) on October 22, 2020. The purpose of the meeting was to discuss the following topics regarding Vogtle Electric Generating Plant (VEGP), Units 3 and 4: (1) submittal of turbine maintenance and inspection program in accordance with updated final safety analysis report (UFSAR) and (2) regulatory guidance on making emergency plan (EP) staffing changes to the number of system operators (SOs).

The meeting notice can be found in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML20293A154. 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 documents referenced during the discussion can be found under ADAMS Accession Nos. given below:

|  |             |
|--|-------------|
| <ul style="list-style-type: none"><li>• Submittal of Turbine Maintenance and Inspection Program in Accordance with UFSAR</li></ul> | ML20192A048 |
| <ul style="list-style-type: none"><li>• Regulatory Guidance on Making EP Staffing Changes to the Number of SOs</li></ul>           | ML20290A806 |

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Summary of Meeting:Submittal of Turbine Maintenance and Inspection Program in Accordance with UFSAR

The NRC staff provided background on the license condition requiring SNC to submit a turbine maintenance and inspection program consistent with the activities identified in the UFSAR for VEGP Units 3 and 4. SNC submitted this program on July 10, 2020 (ADAMS Accession No. ML20192A048). The staff reviewed this submittal to confirm the program is consistent with the UFSAR.

The NRC staff provided the following items for SNC to consider:

- Inspection intervals for turbine rotor are not specified for the high pressure and low-pressure rotors (8-year and 10-year interval, respectively). SNC agreed to add the inspection intervals for the turbine rotor inspection to the program description.
- No inspection methods and acceptance criteria are specified in the program description. NRC staff noted that procedures B-MTS-MMM-001 and B-MTS-MMM-003 specify the inspection methods and acceptance criteria. Therefore, stating that the turbine inspections (visual, magnetic particle, and ultrasonic examinations) would be performed using these procedures, would satisfy this requirement. SNC agreed to add these procedures to a list of references and add the appropriate description of those references, in the turbine rotor inspection portion of the program description.

At the conclusion of the discussion, there was an opportunity for the public to provide comments and ask questions. Glenn Carroll asked about the accuracy of the review status of the Inspections, Tests, Analyses and Acceptance Criteria closure notifications (ICNs) on the NRC website. The NRC staff explained the ICN status report is accurate and current as of the date published on the report which is updated periodically to reflect current performance.

Regulatory Guidance on Making EP Staffing Changes to the Number of SOs

SNC provided presentation material (ADAMS Accession No. ML20290A806) on its application of Regulatory Guide (RG) 1.219, "Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors," regarding the determination whether proposed changes to SO staffing for VEGP Units 3 and 4 constituted a reduction in effectiveness to SNC's Standard EP Annex for VEGP Units 3 and 4. SNC described the proposed change which will reduce the number of non-licensed operators (SOs) listed in Table 2.2.A of SNC's Standard EP Annex for VEGP Units 3 and 4 from 8 to 6 for dual unit operation. SNC highlighted section 1.8b.(1) of RG 1.219 which states: "If the licensee's original commitment resulted from a conservative operating philosophy, the licensee may be able to show that the reduction in commitment would not reduce the effectiveness of its emergency plan." SNC also referred to section 4.2c of RG 1.219 and stated that based on the examples listed, the reduction in SO staffing does not rise to the level that could require NRC approval.

The NRC staff emphasized that the purpose of the public meeting was to provide SNC with feedback on whether SNC is looking at the right areas in evaluating whether there is a reduction in effectiveness. However, the staff emphasized that the decision on whether the changes to SNC's Standard EP Annex for VEGP Units 3 and 4 constitute a reduction in effectiveness rests with the licensee and would be subject to review as part of the NRC's regional inspection activities. Further, the staff stated that SNC needs to specifically evaluate if removing the

number of SOs impacts the ability to perform an emergency function as described in SNC's Standard EP Annex for VEGP Units 3 and 4.

The NRC staff acknowledged that the RG 1.219 sections mentioned in SNC's presentation are applicable; however, there are other sections that are also relevant which need to be considered to support the evaluation and effectiveness decision. The staff provided several examples:

- statement in section 1.8c that clarifies in the case of that particular regulatory decision, conditions may have developed since the original commitments were made, which makes them necessary to maintain the effectiveness
- section 1.9b states it is inappropriate for the licensee to conclude that certain commitments made in the NRC approved EP are no longer required and then compare the EP as modified to SNC's conclusion (i.e., 10 CFR 50.54(q) decision)
- sections 4.a and 4.b

SNC agreed to consider the NRC staff's comments.

SNC discussed the impact of this proposed change on a separate SNC license amendment request (LAR), which the staff is currently reviewing (ADAMS Accession No. ML20192A140). This LAR requests changes to emergency response organization (ERO) staffing and augmentation times for the entire SNC fleet. SNC stated it evaluated the SO staffing change discussed above and any impacts it would or would not have upon the LAR, specifically whether the LAR may require repair and corrective action function from SOs. SNC noted the performance-based procedure analysis performed for this LAR regarding VEGP Units 3 and 4 never employs more than 6 SOs for dual unit operation. SNC concluded that there would be no impact to the fleet LAR, as the SOs being removed do not have any EP function, nor are they relied upon in the LAR.

The NRC staff stated that repair and corrective actions performed by the SOs should be built in SNC's emergency operating procedures. SNC agreed to consider that in their evaluation.

The NRC staff asked about the schedule for the licensee commitment per the Near-Term Task Force (NTTF) 9.3 recommendation for SNC to provide the NRC a multi-unit ERO staffing assessment license commitment prior to VEGP Unit 3 fuel load. SNC mentioned it would finalize and submit the staffing assessment after completing the specific change evaluation (discussed above), and it would communicate the date when the NTTF staffing analysis will be submitted to NRC in the near future.

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 OCTOBER 22, 2020, DATED: NOVEMBER 5, 2020

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**ADAMS Accession No.: ML20303A042****\*via e-mail****NRC-001**

|        |                |             |             |                  |
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| NAME   | ASchiller* (c) | RButler*    | CSantos*    | OLópez-Santiago* |
| DATE   | 11/3/20        | 11/3/20     | 11/4/20     | 11/5/20          |
| OFFICE | PM: NRR/VPO    |             |             |                  |
| NAME   | ASchiller* (s) |             |             |                  |
| DATE   | 11/5/20        |             |             |                  |

**OFFICIAL RECORD COPY**

**AGENDA FOR PUBLIC MEETING  
U.S. NUCLEAR REGULATORY COMMISSION (NRC)  
Thursday, October 22, 2020  
Teleconference  
9:00 a.m. – 12:00 p.m.**

**PURPOSE:** To discuss issues associated with the safety review of licensing actions and/or Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) closures 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          |               |

**CLOSED**

|            |             |         |
|------------|-------------|---------|
|            | (If needed) | NRC/SNC |
| 12:00 p.m. | Adjourn     |         |

Enclosure 1

**PUBLIC MEETING**  
**U.S. NUCLEAR REGULATORY COMMISSION**  
**Thursday, October 22, 2020**  
**Teleconference**  
**9:00 a.m. – 12:00 p.m.**

**List of Attendees**

| <b>Name</b>   | <b>Organization</b>                |
|---|------------------------------------|
| <b>Representing the Nuclear Regulatory Commission</b>   |                                    |
| Omar López-Santiago<br>Mike King<br>Cayetano Santos<br>Alina Schiller<br>Christopher Welch<br>Billy Gleaves<br>Garry Armstrong<br>Olivier Lareynie  | NRR/VPO                            |
| John Honcharik  | NRR/DNRL                           |
| Michael Norris<br>Raymond Hoffman<br>Don Johnson<br>Joseph Anderson<br>Dan Barss<br>Bruce Musico<br>Robert Kahler<br>Charles Murray<br>Kenneth Mott<br>Raymond Gibson<br>Jessie Quichocho   | NSIR/DPR                           |
| Jason Eargle  | Region II                          |
| <b>Representing Industry</b>  |                                    |
| Amy Chamberlain<br>Steven Leighty<br>Stephanie Agee<br>Jim Miller<br>Nick Kellenberger<br>Mark Humphrey<br>Dan Williamson<br>Ernest Bates<br>Jonathan Hartman<br>Adam Quarles<br>Ricky Collings<br>Jamie Coleman<br>Cheryl Gayheart<br>Wesley Sparkman<br>Eddie Grant | Southern Nuclear Operating Company |

Enclosure 2

| <b>Representing the Public</b> |                     |
|--------------------------------|---------------------|
| Glenn Carroll                  | Nuclear Watch South |

Note: All participated via teleconference.

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(Revised 9/16/2020)

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