



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

February 24, 2021

Ms. Cheryl A. Gayheart
Regulatory Affairs Director
Southern Nuclear Operating Co., Inc.
3535 Colonnade Parkway
Birmingham, AL 35243

SUBJECT: JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2; EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2; AND VOGTLE ELECTRIC GENERATING PLANT, UNITS 1, 2, 3, AND 4 – AUDIT PLAN FOR REVISION TO EMERGENCY PLAN TO CHANGE STAFFING AND EXTEND STAFF AUGMENTATION TIMES FOR EMERGENCY RESPONSE ORGANIZATION POSITIONS (EPID L-2020-LLA-0150 AND L-2020-LLA-0151)

Dear Ms. Gayheart:

By letter dated June 30, 2020 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML20192A140), Southern Nuclear Operating Company (SNC, the licensee) submitted a license amendment request (LAR) for the Joseph M. Farley Nuclear Plant, Units 1 and 2; Edwin I. Hatch Nuclear Plant, Units 1 and 2; and Vogtle Electric Generating Plant, Units 1, 2, 3, and 4 (SNC fleet). The proposed LAR would revise the SNC Standard Emergency Plan (SEP), including the site annexes, to change the emergency response organization (ERO) staffing composition and extend staff augmentation time from 75 to 90 minutes.

By letter dated July 23, 2020 (ADAMS Accession No. ML20202A017), the U.S. Nuclear Regulatory Commission (NRC) staff concluded that SNC's LAR did not provide technical information in sufficient detail to enable the NRC staff to complete its detailed review and make an independent assessment regarding the acceptability of the proposed LAR in terms of regulatory requirements for the protection of public health and safety and the environment. The NRC staff identified that the information was insufficient for its technical review.

On July 30, 2020 (ADAMS Accession No. ML20217L369), a Category 1 public meeting was held between the NRC and representatives of SNC. The purpose of the meeting was to clarify the NRC's July 23, 2020, letter to SNC regarding the SNC fleet ERO staffing LAR.

By letter dated August 11, 2020 (ADAMS Accession No. ML20224A464), SNC provided a supplement to its LAR.

By e-mail dated September 1, 2020 (ADAMS Accession No. ML20245E284), the NRC staff accepted the LAR for review.

By e-mail dated October 14, 2020 (ADAMS Accession No. ML20293A075), the NRC staff provided a request for additional information (RAI).

On November 12, 2020 (ADAMS Accession No. ML20318A075), a Category 1 public meeting was held between the NRC staff and representatives of SNC to clarify any questions from SNC.

By letter dated November 20, 2020 (ADAMS Accession No. ML20325A219), SNC provided responses to the RAI.

After careful review, the NRC staff has determined that an audit is needed to review the proposed LAR justification supporting revision to the SNC SEP and to determine additional information that may need to be docketed for the NRC to complete its review. The includes the site annexes, to change the ERO staffing composition and extend staff augmentation time from 75 to 90 minutes.

The NRC staff has prepared the enclosed audit plan per NRC Office of Nuclear Reactor Regulation Office Instruction LIC-111, "Regulatory Audits" (ADAMS Accession No. ML082900195).

LIC-111 states that a regulatory audit is a planned, licensed, or regulation-related activity that includes the examination of primarily non-docketed information with the intent to gain understanding, to verify information, or to identify information that will require docketing to support the basis of the licensing or regulatory decision.

The virtual audit will take place from March 15 to April 30, 2021.

If you have any questions, please contact me at (301) 415-3100 or by e-mail to John.Lamb@nrc.gov.

Sincerely,

/RA/

John G. Lamb, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-348, 50-365, 50-321,
50-366, 50-424, 50-425, 52-025, and
50-026

Enclosure:
Audit Plan

cc: Listserv

REGULATORY AUDIT PLAN

BY THE OFFICE OF NUCLEAR REACTOR REGULATION

FOR THE REVISION TO EMERGENCY PLAN TO CHANGE STAFFING AND EXTEND STAFF

AUGMENTATION TIMES FOR EMERGENCY RESPONSE ORGANIZATION POSITIONS

JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2

EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2

VOGTLE ELECTRIC GENERATING PLANT, UNITS 1, 2, 3, AND 4

DOCKET NOS. 50-348, 50-364, 50-321, 50-366, 50-424, 50-425, 52-025, AND 52-026

1.0 BACKGROUND

By letter dated June 30, 2020 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML20192A140), Southern Nuclear Operating Company (SNC, the licensee) submitted a license amendment request (LAR) for the Joseph M. Farley Nuclear Plant, Units 1 and 2; Edwin I. Hatch Nuclear Plant, Units 1 and 2; and Vogtle Electric Generating Plant, Units 1, 2, 3, and 4 (SNC fleet). The proposed LAR would revise the SNC Standard Emergency Plan (SEP), including the site annexes, to change the emergency response organization (ERO) staffing composition and extend staff augmentation times from 75 to 90 minutes.

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On July 30, 2020 (ADAMS Accession No. ML20217L369), a Category 1 public meeting was held between the NRC staff and representatives of SNC. The purpose of the meeting was to clarify the NRC's July 23, 2020, letter to SNC regarding the SNC fleet ERO staffing LAR.

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After careful review, the NRC staff has determined it would need to audit the proposed LAR to revise the SNC SEP, including the site annexes, to change the ERO staffing composition and extend staff augmentation times from 75 to 90 minutes.

2.0 REGULATORY AUDIT BASIS

This regulatory audit is based on the SNC LAR, as supplemented, and Section 13.3, "Emergency Planning," of NUREG-0800, "Standard Review Plan," (ADAMS Accession No. ML063410307). This regulatory audit is a planned, licensed, or regulation-related activity that includes the examination of primarily non-docketed information with the intent to gain understanding, to verify information, or to identify information that will require docketing to support the basis of the licensing or regulatory decision.

3.0 REGULATORY AUDIT SCOPE OR METHODOLOGY

After careful review, the NRC staff has determined that an audit is needed to review the proposed LAR justification supporting revision to the SNC SEP and to determine additional information that may need to be docketed for the NRC to complete its review. The includes the site annexes, to change the ERO staffing composition and extend staff augmentation time from 75 to 90 minutes.

4.0 INFORMATION AND OTHER MATERIAL NECESSARY FOR THE AUDIT

The NRC staff needs the following information to support SNC's proposed ERO on-shift and augmentation changes:

- Provide information that supports the capability to provide timely augmentation to the Command and Control function.
 - Provide the qualification and training requirements for SNC's Shift Managers/Emergency Directors (ED) to implement SNC event response procedures. This information would include both the capabilities/responsibilities of a Shift Manager and of a ED. This information should provide justification for the proposed changes to Shift Manager/ED ERO augmentation timing.
 - Provide information related to drills and/or exercises that were supported by only the Shift Manager for 75 minutes from the declaration of an Alert or greater emergency classification level (ECL) and for similar drills and/or exercises where an Emergency Director/Manager arrived before 75 minutes so that a direct comparison of emergency response can be made.
- Provide information to show how SNC licensed operators could concurrently meet the requirements of a licensed operator pursuant to 10 CFR 50.54(m)(2) and the Communications function as required by 10 CFR 50.47(b)(2).
 - Provide information related to drills and/or exercises that were supported by only licensed operators as on-shift communicators for 75 minutes from the declaration of an Alert or greater ECL and for similar drills and/or exercises where

augmenting communicators arrived before 75 minutes so that a direct comparison of emergency response can be made.

- Provide licensed operator initial and requalification evaluated scenarios where either the licensed or senior licensed operator performed their licensed operator responsibilities concurrently with performing the ERO communication function.
- Provide information that could be used by the NRC staff to determine how SNC licensed operators could concurrently implement event response procedures which would include emergency operating procedures, the emergency plan and related implementing procedures, and communication responsibilities while providing electrical and mechanical support for emergency core cooling system equipment, event mitigation, and equipment repair. Note: This information should address both maintenance technicians and maintenance supervisor capabilities.
 - Procedures and related qualifications for SNC's version of Fix-It-Now (FIN) maintenance and its troubleshooting procedures.
 - Evaluated scenarios where the SNC crew demonstrated the capabilities to perform troubleshooting, as provided in the SNC maintenance procedures, without assistance from the maintenance or engineering organizations.
- Provide information that could be used by the NRC staff to determine that the proposed increase in SNC ERO augmenting response time would not impact emergency preparedness key function of Engineering. Note: This information should include addressing the unique SNC shift technical advisor (STA) method of providing on-shift STA expertise and not an individual dedicated to performing the STA function.
 - Provide information related to drills and/or exercises that were supported by only licensed operators as on-shift engineering staff for 75 minutes from the declaration of an Alert or greater ECL and for similar drills and/or exercises where engineering staff arrived before 75 minutes so that a direct comparison of emergency response can be made.
- Provide information that could be used by the NRC staff to determine that the proposed increase in SNC ERO augmenting response time would not impact emergency preparedness key function of Radiation Protection. Note: SNC includes field monitoring, supervision of radiation protection, and radiation protection actions in one Major Functional Area.
 - Provide information related to drills and/or exercises that were supported by only the three Radiation Protection Technicians for 75 minutes from the declaration of an Alert or greater ECL and for similar drills and/or exercises where radiation protection support arrived before 75 minutes so that a direct comparison of emergency response can be made.
- Provide information that could be used by the NRC staff to determine that the proposed increase in SNC ERO augmenting response time would not impact emergency preparedness key function of Dose Assessment. Specifically, explain how the on-shift chemistry technician, or other trained individual, can provide equivalent dose

assessment information as the augmenting ERO for an additional 15 minutes.
Note: The augmenting ERO includes a RP Supervisor at the TSC and two Dose Assessment Supervisor & Analysts at the Emergency Operations Facility (EOF) which appear to have additional dose assessment capability.

5.0 TEAM ASSIGNMENTS

Role	Name	Title
Team Lead and Project Manager	John Lamb	Senior Project Manager
Technical Support	Mike Norris	Senior Emergency Preparedness (EP) Specialist
Technical Support	Ray Hoffman	EP Specialist

6.0 LOGISTICS

The audit will occur by teleconference from March 15 to April 30, 2021. The NRC staff plans to hold a brief entrance meeting at the beginning of the audit and a brief exit meeting at the close of the audit.

7.0 SPECIAL REQUESTS

The NRC staff requests the licensee and its contractors to have the information listed in Section 4.0 above readily available and accessible for review. The NRC staff also requests that cognizant licensee and contractor staff be available to answer any questions from the NRC staff and to track NRC staff questions during the audit. Because of the circumstances surrounding COVID-19, the NRC staff requests that the licensee and its contractors to be flexible in how they will present the audit materials. Given the current situation, presenting the audit materials through a teleconferencing application with capability for sharing content, such as Microsoft Teams, is the best method for all parties.

8.0 DELIVERABLES

An audit summary will be prepared within 90 days of the completion of the audit. If information evaluated during the audit is needed to support a regulatory decision, the NRC staff will identify it in a formal RAI. The NRC staff will provide the RAIs to the licensee in separate docketed correspondence.

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ADAMS Accession No.: ML20342A018

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