



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

February 19, 2021

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

SUBJECT: RESPONSE REGARDING VOGTLE UNIT 3 PHASE 2 STAFFING  
SUBMITTAL ASSOCIATED WITH NEAR TERM TASK FORCE  
RECOMMENDATION 9.3 RELATED TO THE FUKUSHIMA DAI-ICHI  
NUCLEAR POWER PLANT ACCIDENT

Dear Mr. Whitley:

By letter dated March 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12053A340), the U.S. Nuclear Regulatory Commission (NRC) issued a Request for Information (RFI) pursuant to Section 50.54, paragraph (f) of Title 10 of the *Code of Federal Regulations* (10 CFR), regarding Recommendations 2.1 (seismic and flooding evaluations), 2.3 (seismic and flooding walkdowns), and 9.3 (emergency preparedness communication and staffing) of the Near Term Task Force (NTTF) review of insights from the Fukushima Dai-ichi accident. With respect to Recommendation 9.3, Enclosure 5 to the NRC's letter requested licensees to assess their means to power communications equipment onsite and offsite during a prolonged station blackout event and to perform a staffing assessment to determine the staff required to fill all necessary positions in response to a multi-unit event.

The RFI in part, required responses pursuant to the provisions of 10 CFR 50.54(f) pertaining to onsite and augmented staff availability to implement the strategies discussed in the emergency plan and/or plant operating procedures including new staff or functions resulting from the assessment including any identified collateral duties, an implementation schedule to perform the assessments including any identified modifications, and any changes that have been made or will be made to the emergency plan regarding on-shift or augmented staffing. In addition, NTTF Recommendation 9.3 has a dependency on the implementation of NTTF Recommendation 4.2 (mitigating strategies). As a result of this dependency, licensees responded to the RFI in phases. The Phase I staffing had licensees evaluate their ability to respond to a multi-unit station blackout event utilizing existing processes and procedures. The licensee responses to the RFI for the Phase 1 staffing assessments were received and evaluated by the NRC by April 30, 2013. The staff issued acknowledgement letters to all licensees with multi-unit sites, except for SONGS by April 28, 2014.

Licensees in coordination with the NTTF Recommendation 4.2 (mitigating strategies), were to submit for NRC staff review a Phase 2 staffing assessment which provide an assessment of the staffing necessary to perform the functions related to the strategies developed in response to NTTF Recommendation 4.2 and the resulting Order EA-12-049, "Order to Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events."

In accordance with the NRC-endorsed guidance and assumptions of Nuclear Energy Institute (NEI) 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," Sections 2.2, 2.3, and 3, the NRC staff reviewed your Phase 2 assessment for staffing. The NRC staff noted that you assessed your current onsite minimum staffing levels to respond to an event following a beyond design basis large-scale natural event to identify any needed enhancements to ensure that the strategies contained in the existing emergency plan and/or plant operating procedures can be performed by the site staff. Your assessment assumed that a large-scale natural event causes: (1) all units on the site to be affected, (2) there is an extended loss of all alternating current (ac) power, and (3) access to the site is impeded for a minimum of 6 hours. You also assessed your capability to perform the site-specific functions related to the strategies developed in response to NTF Recommendation 4.2 and the resulting Order EA-12-049. You conducted independent reviews and concluded, based on your staffing assessment that the existing on-shift minimum staff is sufficient to implement the existing loss of all ac power, multi-unit event response strategies, including those strategies developed to support the requirements of NRC Order EA-12-049, while supporting performance of the required emergency planning duties without unacceptable collateral duties.

The NRC staff reviewed your Phase 2 submittal (ADAMS Accession No. ML20318A248) and confirmed that your existing emergency response resources, as described in your emergency plan, are sufficient to perform the required plant actions and emergency plan functions, and implement the multi-unit event response strategies that were developed in response to NRC Order EA-12-049 without the assignment of collateral duties that would impact the performance of assigned emergency plan functions.

As a result, the NRC staff concludes that your Phase 2 staffing submittal adequately addresses the response strategies needed to respond to a Beyond Design Basis External Event using your procedures and guidelines. The NRC staff will verify the implementation of your staffing capabilities through the inspection program.

Should you have any questions regarding this letter, please contact Cayetano Santos at (301) 415-7270.

Sincerely,

*/RA/*

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

Docket No.: 52-025

cc: See next page

RESPONSE REGARDING VOGTLE UNIT 3 PHASE 2 STAFFING SUBMITTAL ASSOCIATED WITH NEAR TERM TASK FORCE RECOMMENDATION 9.3 RELATED TO THE FUKUSHIMA DAI-ICHI NUCLEAR POWER PLANT ACCIDENT DATED: FEBRUARY 19, 2021

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OFFICE	NRR/VPO:PM			
NAME	CSantos			
DATE	2/19/21			

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Vogtle Mailing List

(Revised 9/18/2020)

cc:

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

Resident Inspector  
Vogtle Plant Units 3 & 4  
7825 River Road, BIN 63031  
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

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

Mr. Michael J. Yox  
Site Regulatory Affairs Director  
Vogtle Units 3 & 4  
7825 River Road  
BIN 63031  
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 (continued)

Email:

[ppsena@southernco.com](mailto:ppsena@southernco.com) (Peter Paul Sena III)  
[d1mckinn@southernco.com](mailto:d1mckinn@southernco.com) (D.L. McKinney)  
[mdmeier@southernco.com](mailto:mdmeier@southernco.com) (Michael Meier)  
[gchick@southernco.com](mailto:gchick@southernco.com) (Glen Chick)  
[ststimac@southernco.com](mailto:ststimac@southernco.com) (Stephen Stimac)  
[patmarti@southernco.com](mailto:patmarti@southernco.com) (Patrick A. Martino)  
[myox@southernco.com](mailto:myox@southernco.com) (Michael J. Yox)  
[asparton@southernco.com](mailto:asparton@southernco.com) (Anthony S. Parton)  
[kroberts@southernco.com](mailto:kroberts@southernco.com) (Kelli A. Roberts)  
[tgpetrak@southernco.com](mailto:tgpetrak@southernco.com) (Tom C. Petrak)  
[ctdefnal@southernco.com](mailto:ctdefnal@southernco.com) (Chris T. Defnall)  
[cemorrow@southernco.com](mailto:cemorrow@southernco.com) (Calvin E. Morrow)  
[x2rlbeil@southernco.com](mailto:x2rlbeil@southernco.com) (Robert L. Beilke)  
[sleighty@southernco.com](mailto:sleighty@southernco.com) (Steve Leighty)  
[acchambe@southernco.com](mailto:acchambe@southernco.com) (Amy C. Chamberlain)  
[jhaswell@southernco.com](mailto:jhaswell@southernco.com) (Jeremiah C. Haswell)  
[chandu.patel@nrc.gov](mailto:chandu.patel@nrc.gov) (Chandu Patel)  
[george.khoury@nrc.gov](mailto:george.khoury@nrc.gov) (George Khouri)  
[nicholas.karlovich@nrc.gov](mailto:nicholas.karlovich@nrc.gov) (Nicholas D. Karlovich)  
[andrew.lerch@nrc.gov](mailto:andrew.lerch@nrc.gov) (Andrew Lerch)  
[christopher.even@nrc.gov](mailto:christopher.even@nrc.gov) (Christopher Even)  
[brian.kemker@nrc.gov](mailto:brian.kemker@nrc.gov) (Brian J. Kemker)  
[nicole.coovert@nrc.gov](mailto:nicole.coovert@nrc.gov) (Nicole C. Coovert)  
[christopher.welch@nrc.gov](mailto:christopher.welch@nrc.gov) (Christopher Welch)  
[james.gaslevic@nrc.gov](mailto:james.gaslevic@nrc.gov) (James Gaslevic)  
[victor.hall@nrc.gov](mailto:victor.hall@nrc.gov) (Victor Hall)  
[garry.armstrong@nrc.gov](mailto:garry.armstrong@nrc.gov) (Garry Armstrong)  
[michael.webb@nrc.gov](mailto:michael.webb@nrc.gov) (Michael Webb)  
[thomas.fredette@nrc.gov](mailto:thomas.fredette@nrc.gov) (Thomas Fredette)  
[steven.smith@nrc.gov](mailto:steven.smith@nrc.gov) (Steven Smith)  
[cayetano.santos@nrc.gov](mailto:cayetano.santos@nrc.gov) (Cayetano Santos)  
[marissa.bailey@nrc.gov](mailto:marissa.bailey@nrc.gov) (Marissa Bailey)  
[steven.rose@nrc.gov](mailto:steven.rose@nrc.gov) (Steven Rose)  
[bradley.davis@nrc.gov](mailto:bradley.davis@nrc.gov) (Bradley Davis)  
[jose.vasquez@nrc.gov](mailto:jose.vasquez@nrc.gov) (Jose Vasquez)  
[jason.eargle@nrc.gov](mailto:jason.eargle@nrc.gov) (Jason Eargle)  
[kenya.carrington@nrc.gov](mailto:kenya.carrington@nrc.gov) (Kenya Carrington)  
[michael.king2@nrc.gov](mailto:michael.king2@nrc.gov) (Michael King)  
[evan.davidson@nrc.gov](mailto:evan.davidson@nrc.gov) (Evan Davidson)  
[theodore.fanelli@nrc.gov](mailto:theodore.fanelli@nrc.gov) (Theodore Fanelli)  
[bob.brinkman@opc.com](mailto:bob.brinkman@opc.com) (Robert B. Brinkman)  
[eric.rasmussen@opc.com](mailto:eric.rasmussen@opc.com) (Eric Rasmussen)  
[jfuller@meagpower.org](mailto:jfuller@meagpower.org) (J. E. Fuller)  
[sjackson@meagpower.org](mailto:sjackson@meagpower.org) (S.M. Jackson)  
[tbundros@dutil.com](mailto:tbundros@dutil.com) (T. Bundros)  
[orianil@westinghouse.com](mailto:orianil@westinghouse.com) (Dr. L. Oriani)

Vogle Mailing List (continued)

[durhamdc@westinghouse.com](mailto:durhamdc@westinghouse.com) (D. C. Durham)  
[corletmm@westinghouse.com](mailto:corletmm@westinghouse.com) (M.M. Corletti)  
[harperzs@westinghouse.com](mailto:harperzs@westinghouse.com) (Zach Harper)  
[cowardjl@westinghouse.com](mailto:cowardjl@westinghouse.com) (J. L. Coward)  
[swkline@bechtel.com](mailto:swkline@bechtel.com) (S. W. Kline)  
[lisa.matis@tetrattech.com](mailto:lisa.matis@tetrattech.com) (Lisa Matis)  
[bill.jacobs@gdassociates.com](mailto:bill.jacobs@gdassociates.com) (Dr. Bill Jacobs)  
[sroetger@psc.state.ga.us](mailto:sroetger@psc.state.ga.us) (S. Roetger)  
[rtrokey@psc.state.ga.us](mailto:rtrokey@psc.state.ga.us) (Robert L. Trokey)  
[kevin.greene@troutmansanders.com](mailto:kevin.greene@troutmansanders.com) (Kevin C. Greene)  
[sblanton@balch.com](mailto:sblanton@balch.com) (Stan Blanton)  
[g2ndrmdc@southernco.com](mailto:g2ndrmdc@southernco.com) (SNC Document Control)