

**From:** Santos, Cayetano  
**Sent:** Tuesday, June 22, 2021 1:33 PM  
**To:** Vogtle PEmails  
**Subject:** FW: VEGP Unit 4 Operator Licensing Exemption DRAFT  
**Attachments:** NRC Staff Talking Points on SNC VOG 4 OL Draft Exemption Request for 6-24-21 meeting.pdf

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**From:** Santos, Cayetano  
**Sent:** Tuesday, June 22, 2021 1:30 PM  
**To:** Leighty, Steven <[sleighty@southernco.COM](mailto:sleighty@southernco.COM)>; Arafeh, Yasmeeen N. <[YNARAFEH@southernco.com](mailto:YNARAFEH@southernco.com)>  
**Subject:** RE: VEGP Unit 4 Operator Licensing Exemption DRAFT

Steve,

After reviewing the draft submittal you provided, the staff has prepared the attached talking points. I am sharing with you so SNC can be better prepared to discuss these items Thursday morning.

I will make these talking points publicly available in ADAMS.

Please let me know if you have any questions.

Thanks

Tanny Santos

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**From:** Leighty, Steven <[sleighty@southernco.COM](mailto:sleighty@southernco.COM)>  
**Sent:** Monday, June 14, 2021 4:34 PM  
**To:** Santos, Cayetano <[Cayetano.Santos@nrc.gov](mailto:Cayetano.Santos@nrc.gov)>  
**Subject:** [External\_Sender] VEGP Unit 4 Operator Licensing Exemption DRAFT

Tanny,

As discussed earlier today, please find attached the draft exemption for the Vogtle Unit 4 Operator Licenses. This is in support of our presubmittal discussion. Please let me know which date would be best for scheduling the presubmittal meeting.

Thanks,

**Steve Leighty | Southern Nuclear**  
Licensing Manager | Vogtle 3&4  
706.848.6790 | [sleighty@southernco.com](mailto:sleighty@southernco.com)

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**Subject:** FW: VEGP Unit 4 Operator Licensing Exemption DRAFT  
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**From:** Santos, Cayetano

**Created By:** Cayetano.Santos@nrc.gov

**Recipients:**  
"Vogtle PEmails" <Vogtle.PEmails@usnrc.onmicrosoft.com>  
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NRC Staff Talking Points on Draft ND-21-0427, Enclosure 1 and Exemption Request to Support Pre-Submittal Discussion with Southern Nuclear Operating Company

1. Section 1.0 says the request is for the current VEGP Unit 3 licensed operators. The region also has applications pending for VEGP Unit 3 license applicants who have been issued a pass letter (i.e., have taken and passed an NRC initial licensing examination). Has SNC considered including these individuals in this exemption request?
2. The Form 398s for all VOG 4 applicants in the scope of the exemption request will need to be submitted to the region concurrent with the exemption request.
3. Page 1 of 10 says, "Only minor differences were identified in the Waste Water and Offsite Power Systems, consisting of indication, naming, and the resulting impact to the ovation screens, and a physical difference in that Unit 3 is connected to the 230 kV switchyard and Unit 4 is connected to the 500 kV switchyard."

Page 2 of 10 says, "Additionally, the Training Needs Analysis (TNA) conducted for the unit differences determined that no additional training is required; therefore, no new or modified exam questions, operating scenarios, or job performance measures are needed. The TNA also determined that the differences between the units do not affect the operator's ability to operate each unit safely and competently."

The staff would like to discuss the TNA.

- A. Due to the difference in voltages between each switchyard, are each of the main unit generators isolated from the switchyard in the same way – i.e., are there different actions for Unit 3 vs Unit 4, does the Unit 3 Main Generator isolate quicker, are the breakers identical or are they different sizes because of the different switchyards (so would they be operated differently or have different control room indications)? Are there ways to cross-connect electrical busses between the two units? Do different companies own the switchyards, and if so, is that expected to result in any operational differences?
- B. If so, did SNC determine whether any of these differences result in differences in the emergency operating procedures for the units, particularly with station blackout (SBO) and loss of offsite power (LOOP) events?
- C. With respect to the statement, "The TNA also determined that the differences between the units do not affect the operator's ability to operate each unit safely and competently," could you please explain how the determination was made, for example, because there are very few differences, and training is provided on the differences, and procedures exist to help operators operate each the units properly, etc.
- D. Where could the staff find electrical distribution diagrams? Are they readily accessible?

NRC Staff Talking Points on Draft ND-21-0427, Enclosure 1 and Exemption Request to Support Pre-Submittal Discussion with Southern Nuclear Operating Company

4. Page 1 of 10 – 2 of 10 mentions the “Master Equipment List.” Can you clarify what this is (e.g., a list of all plant equipment for both units?)
5. Page 2 of 10 states, “Therefore, Unit 3 and Unit 4 are deemed to be nearly functionally identical.” Can you please clarify what “functionally identical” means?
6. Page 2 of 10 also states, “Additionally, the Training Needs Analysis (TNA) conducted for the unit differences determined that no additional training is required...” Does “additional” mean in addition to training that has already been provided and/or included in the initial and continuing training program?
7. Page 7 of 10 says, “The continuing training program is based on the requirements defined in 10 CFR Part 55 and is accredited through the National Academy for Nuclear Training.” Does SNC consider that to be the requalification program?
8. Page 8 of 10 includes SNC’s assessment of how the exemption is in the public interest. It also says, “Requiring those candidates who thoroughly prepared and successfully passed the examination and the test to re-take them would be inequitable.” The staff assesses whether grant of the exemption would be in the public interest using the [NRC’s Principles of Good Regulation](#): Independence, Openness, Efficiency, Clarity, and Reliability. Whether granting an exemption would be in the public interest depends on the consideration and balancing of these principles. This portion of the request should focus on which of these factors provide for the public interest (e.g., there is additional information in the draft request about conserving NRC and licensee resources, which relates to efficiency).