



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

July 16, 2021

MEMORANDUM TO: Philip J. McKenna, Chief
Vogtle Project Office
Office of Nuclear Reactor Regulation

FROM: Cayetano Santos Jr., Sr Project Manager */RA/*
Vogtle Project Office
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR
OPERATING COMPANY ON JULY 8, 2021

The U.S. Nuclear Regulatory Commission (NRC) staff held a public observation meeting with Southern Nuclear Operating Company (SNC) on July 8, 2021. The purpose of the meeting was to discuss two topics: (1) draft inspections, tests, analyses, and acceptance criteria (ITAAC) closure notification for ITAAC index number 515 and other ITAAC impacted by the fact that incore instrument thimble assemblies are not installed until after fuel load and (2) scenarios in which an accepted ITAAC Closure Notification (ICN) or Uncompleted ITAAC Notification (UIN) is subsequently deemed unacceptable.

The meeting notice can be found in the Agencywide Documents Access and Management System (ADAMS) Accession No. ML21188A241. The meeting notice was 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 at the ADAMS Accession Nos. given below:

SNC Presentation: Vogtle 3&4 ITAAC Related to Incore Instrument Thimble Assembly (IITA)	ML21193A076
NRC Presentation: What Happens When an Accepted ICN, IPCN, or UIN is Not Acceptable?	ML21188A334

CONTACT: C. Santos, NRR/VPO
(301) 415-7270

Meeting Summary

On July 8, 2021, the NRC staff held an observation public meeting with Southern Nuclear Operating Company (SNC) to discuss two topics.

Topic 1

The first topic was a discussion of the draft ICN for ITAAC index number 515 and other ITAAC impacted by the fact that the incore instrument thimble assemblies (IITAs) are not installed until after fuel load. ITAAC 515 verifies that certain sensors that are used for input to the Diverse Actuation System (DAS) are separate from those used by the Protection and Safety Monitoring System (PMS) and plant control system. This was a follow-up discussion of a topic at the June 24, 2021, public meeting. SNC's presentation described (1) the design of the IITAs and the configuration of the cables within them; (2) proposed verifications that will be performed after initial fuel load to ensure that the thimbles were installed correctly; (3) intended use of Nuclear Energy Institute (NEI) 08-01, "Industry Guideline for ITAAC Closure Process Under Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52," to credit inspection of the IITAs performed at the manufacturing site; and (4) other ITAAC related to the IITA (ADAMS Accession No. ML21193A076).

Below is a summary of the resulting discussion:

- The NRC staff asked questions to confirm their understanding of the IITA design. SNC staff explained that the instrumentation grid assembly (IGA) is on the underside of the upper internals and that the IITAs are attached to, and suspended from, the IGA. The IITAs are inserted into certain fuel bundles during normal operation. If the IITAs were installed without fuel in the core, the thimble assemblies would be hanging freely and would likely be damaged during preoperational testing.
- The NRC staff commented that if it was the intent of Westinghouse Electric Company that the IITAs be installed prior to fuel load, this may need to be corrected in a future update of the Design Control Document for the AP1000.
- Since ITAAC index number 515 calls for an inspection of the "as-built system" the NRC staff asked how an inspection at the manufacturing site demonstrates that the acceptance criteria are met. SNC staff responded that the justification of testing completed at other than its final installed location for ITAAC index number 515 is the same as that for ITAAC index number 570. NRC staff commented that per NEI 08-01, inspections at a manufacturing site may be credited if onsite inspections are not feasible, but the component should be installed in its final location before the ICN is submitted to verify test results remain valid after installation. NRC staff noted that the ICN for ITAAC index number 570 doesn't reference NEI 08-01 and implies that the cables are installed in their final location. SNC responded that the Field Service Report referenced in that ICN verifies that the sheathes were installed correctly at the site and that other reports document tests done at the manufacturing site.
- Regarding ITAAC index number 565, the NRC staff asked what inspections would be performed of components internal to the reactor vessel. SNC responded that no in-vessel inspections are planned at this time but they are still evaluating this ITAAC.
- The NRC staff will continue its internal discussions of these issues and will schedule a followup meeting with SNC at an appropriate time.

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.

Topic 2

The second topic was a discussion of scenarios in which a previously accepted ICN or UIN is subsequently deemed unacceptable. The NRC staff's presentation (1) explained that NRC staff determinations in documents such as ICNs and UINs are interim determinations that do not become final until the NRC makes the 10 CFR 52.103(g) finding, (2) emphasized that the licensing basis should be used to determine the acceptability of ITAAC closure, (3) described the processes to be followed if previously accepted ICNs or UINs are subsequently determined to be unacceptable, and (4) illustrated these processes with three example cases (ADAMS Accession No. ML21188A334).

Below is a summary of the resulting discussion:

- SNC staff noted that both Case 1 and Case 3 are based on NRC inspection findings and asked why Case 1 involved notification of the Headquarters Operation Officer (HOO) while Case 3 does not. NRC staff clarified that the steps outlined in Case 1 would be more appropriate if it were a licensee identified issue.
- SNC staff asked if notification of the HOO is required when an ITAAC finding is made by NRC inspectors. The NRC staff agreed that the intent of the HOO notification is to make the NRC aware of potential issues identified by the licensee prior to making a 103(g) finding, and is not expected for NRC identified issues.
- SNC staff noted that an important distinction for the licensee is whether a maintenance issue requires an ITAAC Post-Closure Notification (IPCN) or not. This is because maintenance issues that do not require an IPCN may be resolved internally whereas IPCNs must be submitted to and accepted by the NRC prior to the 103(g) finding.

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

SUBJECT: SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR
OPERATING COMPANY ON DATE JUNE 24, 2021
DATED: JULY 16, 2021

DISTRIBUTION:

PUBLIC
VPO R/F
RidsOpaMail
RidsOgcMailCenter
RidsRgn2MailCenter
RidsAcrsMailCenter
PMcKenna, NRR
CSantos, NRR
CWelch, NRR
JGaslevic, NRR

ADAMS Accession No.: ML21194A039 ***via e-concurrence** **NRR-106**

OFFICE	PM: NRR/VPO	LA: NRR/VPO	BC: NRR/VPO	PM: NRR/VPO
NAME	CSantos*	RButler*	PMcKenna*	CSantos*
DATE	7/12/2021	7/13/2021	7/16/2021	7/16/2021

OFFICIAL RECORD COPY

AGENDA FOR PUBLIC MEETING
U.S. NUCLEAR REGULATORY COMMISSION
Thursday, July 8, 2021
Teleconference
10:30 a.m. – 12:00 p.m.

PURPOSE: To discuss issues associated with the safety review of licensing actions for Southern Nuclear Operating Company's (SNC) Vogtle Electric Generating Plant (VEGP) Units 3 and 4.

Time	Topic	Led By
10:30 a.m.	Opening Remarks and Introductions	NRC
10:35 a.m.	Discussion of Identified Topics <ul style="list-style-type: none"> • draft inspections, tests, analyses, and acceptance criteria (ITAAC) closure notification for ITAAC index number 515 and other ITAAC impacted by the incore instrument thimble assembly not installed until after fuel load; and • scenarios in which an accepted ITAAC Closure Notification (ICN) or Uncompleted ITAAC Notification (UIN) is subsequently deemed unacceptable Opportunity for Public Comment Following each Topic	NRC/SNC NRC/Public
	Open Portion Concludes	NRC
	Closed Portion of Meeting (If needed)	NRC/SNC
12:00 p.m.	Adjourn	NRC

PUBLIC MEETING
U.S. NUCLEAR REGULATORY COMMISSION
Thursday, July 8, 2021
List of Attendees

Name	Organization
Cayetano (Tanny) Santos Christopher Welch Philip McKenna Greg Bowman James Gaslevic William (Billy) Gleaves Michael Webb Jennie Rankin Garry Armstrong Brian Wittick	NRC/Office of Nuclear Reactor Regulation
Nicole Coover Katie McCurry Marissa Bailey Omar Lopez-Santiago Bradley Davis Jason Eargle	NRC/Region II
Bruce Musico	NRC/Office of Nuclear Security and Incident Response
Michael Spencer	NRC/Office of the General Counsel
Kelli Roberts Calvin Morrow Steve Erick Tim Cureton Kenneth Gregory Vikram Balakrishnan Steve Leighty Nick Kellenberger Amy Chamberlain Adam Quarles	Southern Nuclear Operating Company
Wayne Marquino Zachary Harper Jessie Crozier Brian Schleger Shelby Tucker Gene Hennelly Tsuyoshi Daito Nick Theodore Eric Peterson Andrew Percoco Sandra Shepherd Matt Davis	Members of the Public

Note: All participated via teleconference.