



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

August 24, 2021

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

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

SUBJECT: SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR  
OPERATING COMPANY ON AUGUST 12, 2021

The U.S. Nuclear Regulatory Commission (NRC) staff held a public observation meeting with Southern Nuclear Operating Company (SNC) on August 12, 2021. The purpose of the meeting was to discuss two topics: (1) inspections, tests, analyses, and acceptance criteria (ITAAC) closure for components that are not installed until after fuel load and (2) ITAAC closure notification for ITAAC index number 570.

The meeting notice can be found in the Agencywide Documents Access and Management System (ADAMS) Accession No. ML21222A089. 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. A transcript of the meeting can be found at ADAMS Accession No. ML21230A011. The documents referenced during the discussion can be found at the ADAMS Accession Nos. given below:

Combined License for Vogtle Electric Generating Plant (Vogtle) Unit 3	ML14100A106
Nuclear Energy Institute (NEI) 08-01, "Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52," Revision 5 – Corrected	ML14182A158
Initial uncompleted ITAAC closure notification for ITAAC index number 570	ML16274A292
NRC staff's talking points regarding ITAAC index number 570	ML21223A094
ITAAC closure notification for ITAAC index number 570	ML20141L588

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## Meeting Summary

On August 12, 2021, NRC staff held an observation public meeting with Southern Nuclear Operating Company (SNC) to discuss (1) ITAAC closure for components that are not installed until after fuel load and (2) ITAAC closure notification (ICN) for ITAAC index number 570. These topics were follow-up discussions to topics discussed at the June 24, and July 8, 2021 public meetings.

### Topic 1

The first topic was a discussion of ITAAC closure for components that are not installed in their final location until after fuel load. The NRC staff explained the term “as-built” as defined in Appendix C of the combined licenses for Vogtle Units 3 and 4 (ADAMS Accession No. ML14100A106) and emphasized that the two sentences that make up that definition must be taken together to completely describe the term. If technically justified, the physical properties of a component may be determined at other than its final location. If this justification is used, it should be shown that the subsequent handling and installation of the component should not alter these properties. Also, the component must be installed in its final location at the plant before submitting the ICN.

The NRC staff identified several ITAAC that include the term as built but include components that are not installed in their final location until after fuel load. These include ITAAC index numbers 68, 75, 515, 565, and 570. The NRC staff noted that one option to address the as-built condition is for SNC to request a license amendment and exemption to modify these ITAAC to address the components that cannot be inspected or tested in their as-built location.

SNC staff responded that, based on their interpretation of Section 9, “Guidance for Inspections, Tests, or Analyses, Performed at Other than Final Installed Location,” of NEI 08-01 (ADAMS Accession No. ML14182A158), the two sentences in the definition of “as-built” do not always go together. SNC’s initial plan to address the as-built issue for incore instrument thimble assemblies (IITAs) was to invoke Section 9.7 of NEI 08-01 by providing a technical justification for inspections and tests at other than the final location. SNC will reconsider this approach based on the comments provided by the NRC staff at this meeting.

The NRC staff explained how the guidance for inspections, tests, or analyses performed at other than final installed location in NEI 08-01 was developed and how the NRC has interpreted and applied this guidance. In particular, the staff emphasized that to fully understand the use of “as-built,” it is important to remember that the purpose of ITAAC is to “provide reasonable assurance that the facility *has been constructed* in conformity” with the combined license and regulations (emphasis added). The key concern is ultimately how the plant is constructed.

SNC staff noted that ITAAC must be completed before fuel load and asked for the components in question to be considered in their final location at the plant site prior to loading fuel and compliant with the as-built definition. The NRC staff responded that the term construction in the regulations reflects the process of assembling a plant in which all of the structures, systems, and components are integrated and in their final place during operation. The NRC staff agreed that for these components there is an inconsistency that was not fully considered when the ITAAC were developed and approved. Last, the NRC staff noted that the license amendment process can be used to address these types of inconsistencies.

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 the ICN for ITAAC index number 570.

SNC staff discussed the history of ITAAC index number 570 beginning with the initial uncompleted ITAAC closure notification (UIN) submitted in calendar year (CY) 2016 (ADAMS Accession No. ML16274A292). During a public meeting in CY 2016 the NRC staff noted that this UIN was inadequate and that the UIN should also include a discussion that the required sheath performs its design function. SNC then submitted a revised UIN in CY 2018 (ADAMS Accession No. ML18094A769). SNC staff described differences between the UIN submitted in CY 2018 and the ICN later submitted in CY 2020 (ADAMS Accession No. ML20141L588).

Below is a summary of SNC's response to the talking points and questions prepared by the NRC staff (ADAMS Accession No. ML21223A094):

- Reference 1 of the ICN covers the acceptance testing (overvoltage, insulation resistance, and continuity) of the head area cable assembly. Reference 2 of the ICN covers the installation of the head area cable assembly into the integrated head package and included pre- and post-installation checks of continuity and resistance. Both of these references pertain to the head area cables.
- SNC staff stated that the head area cables were in scope of the ITAAC but the IITAs were outside the scope.
- SNC ensured that the ICN for ITAAC index number 570 is supported by its underlying references by noting that they used the same reference quality assurance process that they use for all ICNs.
- SNC used the CY 2018 UIN which was accepted by the NRC as the basis for preparing the ICN. The NRC staff noted that sheathing is the topic of this ITAAC and asked how sheathing could be verified by inspection since it is internal to the cables. SNC staff responded that verification was done by the successful completion of performance tests.
- SNC staff identified the certificate of conformance and acceptance testing document used to verify the Class 1E core exit temperature sensor cables within the IITAs are sheathed. SNC staff also noted that this document was not referenced in the ICN because it was not in scope of the ITAAC.

The NRC staff noted there was a misinterpretation between the NRC and SNC regarding the scope of ITAAC index number 570. The purpose of this ITAAC is to verify that the cables from the incore thermocouple elements inside the IITAs and the cables on the integrated head package have sheaths to protect Class 1E cables due to a lack of separation from non Class 1E cables. The NRC staff's interpretation of the scope of this ITAAC was that it included both the IITA assemblies and the head area cables.

During a previous public meeting SNC stated that the ICN for ITAAC index number 570 was to be used as a precedent for what would be submitted as the ICN for ITAAC index number 515. The NRC staff asked if SNC still planned to do this. SNC responded that this statement was based on the interpretation of as built as the final location of a component at the end of construction, not necessarily its location during operation.

The NRC staff agreed to consider SNC's comments and will discuss with SNC at a future meeting.

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 No.: 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 AUGUST 12, 2021 DATED: AUGUST 24, 2021

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**ADAMS Accession No.: ML21230A006 \*via e-mail NRR-106**

<b>OFFICE</b>	PM: NRR/VPO	LA: NRR/VPO	PM: NRR/VPO
<b>NAME</b>	CSantos	RButler	CSantos
<b>DATE</b>	8/23/2021	8/20/2021	8/23/2021
<b>OFFICE</b>	BC: NRR/VPO	PM: NRR/VPO	
<b>NAME</b>	PMcKenna	CSantos	
<b>DATE</b>	8/23/2021	8/24/2021	

**OFFICIAL RECORD COPY**

**AGENDA FOR PUBLIC MEETING  
U.S. NUCLEAR REGULATORY COMMISSION  
Thursday, August 12, 2021  
Teleconference  
9:00 a.m. – 11:30 a.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.

<b>Time</b>	<b>Topic</b>	<b>Led By</b>
9:00 a.m.	Opening Remarks and Introductions	NRC
9:05 a.m. – 11:00 a.m.	Discussion of Identified Topics  (1) ITAAC closure for components that are not installed until after fuel load  (2) ITAAC closure notification (ICN) for ITAAC index number 570.	NRC/SNC
	Opportunity for Public Comment Following each Topic	NRC/Public
11:00 a.m.	Open Portion Concludes	NRC
11:00 a.m. – 11:30 a.m.	Closed Portion of Meeting (If needed)	NRC/SNC
11:30 a.m.	Adjourn	NRC

**PUBLIC MEETING**  
**U.S. NUCLEAR REGULATORY COMMISSION**  
**Thursday, August 12, 2021**  
**List of Attendees**

Name	Organization
Cayetano (Tanny) Santos Christopher Welch Philip McKenna James Gaslevic William (Billy) Gleaves Greg Bowman Michael Webb	NRC/Office of Nuclear Reactor Regulation
Nicole Coover Brian Kempker Andrea Johnson Bradley Davis Katie McCurry Marissa Bailey Jason Eargle Omar Lopez-Santiago	NRC/Region II
Michael Spencer Susan Vrahoretis	NRC/Office of the General Counsel
Mike Yox Kelli Roberts Steve Leighty Nick Kellenberger Tim Cureton Jon Fisher Calvin Morrow Bob Beilke Ken Gregory Amy Chamberlain Eddie Grant Stephanie Agee Alan Lovett (Balch)	Southern Nuclear Operating Company
Bob Brinkman Zack Harper	Members of the Public

Note: All participated via teleconference.