



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

September 9, 2022

LICENSEE: SOUTHERN NUCLEAR OPERATING COMPANY
FACILITY: VOGTLE ELECTRIC GENERATING PLANT, UNIT 4
SUBJECT: SUMMARY OF AUGUST 25, 2022, MEETING WITH SOUTHERN NUCLEAR OPERATING COMPANY

On August 25, 2022, the U.S. Nuclear Regulatory Commission (NRC) held a virtual public meeting with representatives of Southern Nuclear Operating Company (SNC). The purpose of the meeting was to have a pre-submittal discussion about a potential license amendment to delete and consolidate several electrical inspections, tests, analyses, and acceptance criteria (ITAAC) in the Vogtle Electric Generating Plant (VEGP) Unit 4 combined license (COL) (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14100A135). The potential license amendment was provided to the NRC in the form of a draft license amendment request (LAR) and was based, in part, on lessons learned from the ITAAC process for VEGP Unit 3. In the draft LAR, SNC proposed two categories of changes to the VEGP Unit 4 COL, which would require an amendment and exemption: first, a deletion of certain redundant ITAAC, and second, a consolidation of certain electrical cable, raceway color coding, and separation ITAAC to improve efficiency of ITAAC completion. The draft LAR and presentation are available at ML22231A349. The meeting notice and agenda are available at ML22231B120. An attendee list is enclosed.

In its draft LAR, SNC proposed the deletion of 14 "assigned division" ITAAC that were said to be redundant with other Unit 4 ITAAC. The justification for this proposed deletion is that the inspection, test, and analysis (ITA) for these ITAAC are very similar, and the scope of these individual ITAAC fall within the scope of existing ITAAC for Class 1E cables for containment, and radiologically controlled and non-radiologically controlled areas of the auxiliary building, respectively.

The Unit 4 "assigned division" ITAAC proposed for deletion in the proposed LAR would be as follows:

1. ITAAC 2.1.02.07b (Index No. 26), Reactor Coolant System (RCS)
2. ITAAC 2.1.03.09b (Index No. 83), Reactor System (RXS)
3. ITAAC 2.2.01.06b (Index No. 103), Containment System (CNS)
4. ITAAC 2.2.03.07b (Index No. 172), Passive Core Cooling System (PXS)
5. ITAAC 2.2.04.07b (Index No. 233), Steam Generator System (SGS)
6. ITAAC 2.2.05.06a (Index No. 263), Main Control Room Emergency Habitability System (VES)
7. ITAAC 2.3.02.06b (Index No. 296), Chemical and Volume Control System (CVS)
8. ITAAC 2.3.06.07b (Index No. 368), Normal Residual Heat Removal System (RNS)
9. ITAAC 2.3.07.06a (Index No. 399), Spent Fuel Pool Cooling System (SFS)

10. ITAAC 2.3.10.11a (Index No. 878), Liquid Radwaste System (WLS)
11. ITAAC 2.3.13.06b (Index No. 467), Primary Sampling System (PSS)
12. ITAAC 2.5.02.05a (Index No. 527), Protection and Safety Monitoring System (PMS)
13. ITAAC 2.6.01.03a (Index No. 582), Main ac Power System (ECS)
14. ITAAC 2.7.01.06a (Index No. 687), Nuclear Island Nonradioactive Ventilation System (VBS)

The NRC staff commented that documentation explaining how the ITAAC proposed for deletion are redundant to the remaining ITAAC has not been identified in the proposed LAR. In addition, the justification proposed by SNC is partly based on similarities in uncompleted ITAAC notifications and associated work packages. The staff stated that this would typically be an insufficient basis for justifying the proposed changes. A readily reviewable LAR proposing deletions to ITAAC based on redundancy would specify the redundant ITAAC, explain why these ITAAC contain the same requirements or when completed accomplish the same purposes as the ITAAC proposed to be deleted, and provide adequate explanation or analysis supporting that statement.

The presentation proceeded to the second category of changes proposed in the draft LAR, which is the proposal to consolidate 18 electrical cable, raceway color coding, and separation ITAAC into the three "Containment," "Auxiliary Building Non-Radiation," and "Auxiliary Building Radiation," ITAAC for VEGP Unit 4 as show below:

Containment ITAAC - Unconsolidated	Containment ITAAC - Consolidated
ITAAC 3.3.00.07aa (Index No. 789)	ITAAC 3.3.00.07d.ii.a (Index No. 800)
ITAAC 3.3.00.07ba (Index No. 792)	
ITAAC 3.3.00.07d.ii.a (Index No. 800)	
ITAAC 3.3.00.07d.iii.a (Index No. 803)	
ITAAC 3.3.00.07d.iv.a (Index No. 806)	
ITAAC 3.3.00.07d.v.a (Index No. 809)	

Auxiliary Building Non-Radiation ITAAC - Unconsolidated	Auxiliary Building Non-Radiation ITAAC - Consolidated
ITAAC 3.3.00.07ab (Index No. 790)	ITAAC 3.3.00.07d.ii.b (Index No. 801)
ITAAC 3.3.00.07bb (Index No. 793)	
ITAAC 3.3.00.07d.ii.b (Index No. 801)	
ITAAC 3.3.00.07d.iii.b (Index No. 804)	
ITAAC 3.3.00.07d.iv.b (Index No. 807)	
ITAAC 3.3.00.07d.v.b (Index No. 810)	

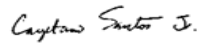
Auxiliary Building Radiation ITAAC - Unconsolidated	Auxiliary Building Radiation ITAAC - Consolidated
ITAAC 3.3.00.07ac (Index No. 791)	ITAAC 3.3.00.07d.ii.c (Index No. 802)
ITAAC 3.3.00.07bc (Index No. 794)	
ITAAC 3.3.00.07d.ii.c (Index No. 802)	
ITAAC 3.3.00.07d.iii.c (Index No. 805)	
ITAAC 3.3.00.07d.iv.c (Index No. 808)	
ITAAC 3.3.00.07d.v.c (Index No. 811)	

The staff summarized its understanding of the consolidation changes as follows: for each case of the consolidation, the unconsolidated design commitments; inspections, tests, and analyses (ITAs); and acceptance criteria would be moved in their entirety with no changes to the consolidated ITAAC. SNC confirmed this understanding was correct. The draft LAR does note, however, that for ITAAC Index No. 805, there is one apparent error in the acceptance criterion number "ii.c)." The proposed revision to consolidated ITAAC Index No. 802 corrects this number to "iii.c)." SNC estimated the current submittal date would be August 31, 2022, with the current proposed approval date of January 7, 2023, but the submittal date might change due to feedback received at this meeting.

Following completion of the presentation by SNC and comments by NRC staff, members of the public were asked for comment. The members of the public who were in attendance offered no comments or questions. The staff did not receive any verbal meeting feedback or completed Public Meeting Feedback forms.

Please direct any inquiries to me at 301-415-7270 or Cayetano.Santos@nrc.gov.

Sincerely,

 Signed by Santos, Cayetano
on 09/09/22

Cayetano Santos Jr., Senior Project Manager
Vogtle Project Office
Office of Nuclear Reactor Regulation

Docket No. 52-026

Enclosure:
As stated

cc: Listserv

LIST OF ATTENDEES

AUGUST 25, 2022, PUBLIC MEETING WITH

SOUTHERN NUCLEAR OPERATING COMPANY

Name	Organization
Cayetano (Tanny) Santos William (Billy) Gleaves Christopher Welch Michael Webb Victor Hall Phil O'Bryan James Gaslevic Garry Armstrong Tom Fredette Bill Roggenbrodt Sheila Ray Thomas Scarbrough Stewart Bailey Morton Wendell Mike Waters	NRC/Office of Nuclear Reactor Regulation
Ken Mott	NRC/Office of Nuclear Security and Incident Response
George Khouri Bradley Davis Robert Mathis Omar Lopez-Santiago Nicole Coovert	NRC/Region II
Julie Ezell	NRC/Office of General Counsel
Amy Chamberlain Kelli Roberts Neil Haggarty Eddie Grant Peter LeJeune Keith Dorsey Keith Drudy	Southern Nuclear Operating Company
Ray Fu Kevin Little Wade McKenzie Michael Hiller	Members of the Public

Vogle Electric Generating Plant, Unit 4, Summary of a Public Meeting with Southern Nuclear Operating Company on August 25, 2022 DATE September 9, 2022

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NAME	WGleaves <i>WG</i>	RButler <i>RB</i>	WMorton <i>WM</i>	MWaters <i>MW</i>
DATE	Aug 31, 2022	Aug 31, 2022	Sep 8, 2022	Sep 8, 2022
OFFICE	R-II/DRP/RPB4	NRR/VPO/VPOB	NRR/VPO/VPOB	
NAME	SBailey YLi for <i>YL</i>	VHall <i>VH</i>	CSantos <i>CS</i>	
DATE	Sep 9, 2022	Sep 9, 2022	Sep 9, 2022	

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