



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

October 4, 2022

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 UNITS 3 AND 4 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 Title 10 of the *Code of Federal Regulations* (10 CFR) 50.54(f), 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 1 staffing had licensees evaluate their ability to respond to a multiunit 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 acknowledgment letters to all licensees with multi-unit sites, except for San Onofre Nuclear Generating Station by April 28, 2014.

Licenses in coordination with the NTF Recommendation 4.2 (mitigating strategies), were to submit for NRC staff's 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 NTF 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 (ML22179A354) 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,



Signed by Hall, Victor
on 10/04/22

Victor Hall, Director
Vogtle Project Office
Office of Nuclear Reactor Regulation

Dockets Nos.: 52-025 and 52-026

cc: Listserv