



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

December 5, 2022

LICENSEE: Southern Nuclear Operating Company, Inc.

FACILITY: Vogtle Electric Generating Plant, Units 1 and 2

SUBJECT: SUMMARY OF DECEMBER 1, 2022, OBSERVATION PRE-SUBMITTAL MEETING HELD WITH SOUTHERN NUCLEAR OPERATING COMPANY, INC., REGARDING A PROPOSED LICENSE AMENDMENT REQUEST FOR VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2 (EPID L-2022-LRM-0094)

On December 1, 2022, an Observation meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Southern Nuclear Operating Company, Inc. (SNC, the licensee). The purpose of the meeting was for SNC to describe its plan to submit a license amendment request (LAR) for Vogtle Electric Generating Plant (Vogtle), Units 1 and 2.

SNC is proposing a LAR to revise Technical Specification (TS) 3.4.14, "RCS [Reactor Coolant System] Pressure Isolation Valve (PIV) Leakage." SNC is proposing to revise Surveillance Requirement (SR) 3.4.14.1 to implement PIV testing in accordance with the inservice testing (IST) program. In addition to the LAR, SNC intends to submit a proposed Alternative Request to the requirements of American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) Code, Section ISTC-3522, "Category C Check Valves," and Subsection ISTC-3630(a) under Section ISTC-3630, to implement performance-based PIV testing.

A list of attendees is provided as an Enclosure.

On November 8, 2022 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML22312A415), the meeting was noticed on the NRC public webpage.

The NRC staff opened the meeting with introductory remarks and a roll call of the attendees.

The SNC representative discussed the following topics: (1) background, (2) proposed LAR, (3) proposed LAR justification, (4) proposed alternative request and technical bases, and (5) schedule.

SNC provided original slides contained in ML22329A019. The SNC representative presented revised slides contained in ML22335A554.

The current Vogtle SR 3.4.14.1 states:

SURVEILLANCE	FREQUENCY
<p>SR 3.4.14.1 -----NOTES----- --</p> <ol style="list-style-type: none"> 1. Not required to be performed in MODES 3 and 4. 2. Not required to be performed on the RCS PIVs located in the RHR flow path when in the shutdown cooling mode of operation. 3. RCS PIVs actuated during the performance of this Surveillance are not required to be tested more than once if a repetitive testing loop cannot be avoided. <p>-----</p> <p>Verify leakage from each RCS PIV is equivalent to ≤ 0.5 gpm per nominal inch of valve size up to a maximum of 5 gpm at an RCS pressure ≥ 2215 psig and ≤ 2255 psig.</p> <p>SR 3.4.14.1 (continued)</p>	<p>In accordance with the INSERVICE TESTING PROGRAM, and 18 months</p> <p><u>AND</u></p> <p>Prior to entering MODE 2 whenever the unit has been in MODE 5 for 7 days or more, if leakage testing has not been performed in the previous 9 months (except for valves HV-8701A/B and HV-8702A/B)</p> <p><u>AND</u></p> <p style="text-align: right;">(continued)</p> <p>For systems rated at less than 50% RCS design pressure, within 24 hours following valve actuation (except for valves HV-8701A/B and HV-8702A/B).</p>

SNC proposes to revise SR 3.4.14.1 to state:

SURVEILLANCE	FREQUENCY
<p>SR 3.4.14.1 -----NOTES----- --</p> <ol style="list-style-type: none"> 1. Not required to be performed in MODES 3 and 4. 2. Not required to be performed on the RCS PIVs located in the RHR flow path when in the shutdown cooling mode of operation. 3. RCS PIVs actuated during the performance of this Surveillance are not required to be tested more than once if a repetitive testing loop cannot be avoided. <p>-----</p> <p>Verify leakage from each RCS PIV is equivalent to ≤ 0.5 gpm per nominal inch of valve size up to a maximum of 5 gpm at an RCS pressure ≥ 2215 psig and ≤ 2255 psig.</p> <p>SR 3.4.14.1 (continued)</p>	<p>In accordance with the INSERVICE TESTING PROGRAM, and 18 months</p> <p><u>AND</u></p> <p>Prior to entering MODE 2 whenever the unit has been in MODE 5 for 7 days or more, if leakage testing has not been performed in the previous 9 months (except for valves HV-8701A/B and HV-8702A/B)</p> <p><u>AND</u></p> <p>----- (continued) -----</p> <p>For systems rated at less than 50% RCS design pressure, within 24 hours following valve actuation (except for valves HV-8701A/B and HV-8702A/B).</p>

In addition to the proposed LAR, SNC proposes to submit an alternative relief request to the requirements of ASME OM Code Section ISTC-3522, "Category C Check Valves," and Subsection ISTC-3630(a) under Section ISTC-3630, "Leakage Rate for Other Than Containment Isolation Valves," for the subject PIVs. The proposed alternative will request PIV testing to be performed at Vogtle, Units 1 and 2, on a performance-based frequency.

SNC noted that: (1) ISTC-3630 requires testing to verify seat leakage within acceptable limits for Category A valves, other than containment isolation valves, (2) ISTC-3630(a) requires this testing at least once every two years, and (3) ISTC-3522 states that each check valve exercise test shall include open and close tests. Closure tests may utilize PIV leak testing.

There was one member of the public in attendance.

The NRC staff verified the proposed deletions above for the frequency in SR 3.4.14.1 Frequency were what SNC intended to request.

The NRC staff asked if SNC reviewed the Vogtle TS 5.5, "Programs and Manuals" (ADAMS Accession No. ML052840233).

The NRC asked about the proposed LAR changes as compared to NUREG-1431, "Standard Technical Specifications Westinghouse Plants, Revision 5, Volume 1, Specifications" (ADAMS Accession No. ML21259A155).

The NRC staff asked if there is the same level of assurance with the proposed deletion of the SR 3.4.14.1 Frequency as the current TS language.

The NRC staff asked about intersystem loss-of-coolant accident (LOCA).

The NRC staff asked if the current PIVs have been tested on 2-year intervals and asked about the PIVs performance history. The NRC staff asked about the precedents and about the maximum interval for the alternative request.

The NRC asked if SNC planned to submit two licensing actions, LAR and Alternative, separately, or as one submittal? SNC said it plans to submit the two licensing actions in one document. The NRC staff said that it would process the two licensing actions separately.

There was one member of the public in attendance. The member of the public did not have any questions for the NRC staff.

The NRC staff made no regulatory decisions during the meeting. Once received, the NRC staff will perform a thorough review of the proposed LAR. The NRC staff will make any regulatory decisions in writing in a timely manner. Public Meeting Feedback forms were available, but no comments were received.

The meeting adjourned at 2:00 pm Eastern Time (ET).

Please direct any inquiries to me at John.Lamb@nrc.gov or 301-415-3100.

/RA/

John G. Lamb, Senior Project Manager
Plant Licensing Branch, II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-424 and 50-425

Enclosure:
List of Attendees

cc: Listserv

LIST OF ATTENDEES
DECEMBER 1, 2022, PRE-SUBMITTAL MEETING WITH SOUTHERN NUCLEAR COMPANY
REGARDING A PROPOSED SR 3.4.14.1
LICENSE AMENDMENT REQUEST
VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2

<u>ATTENDEE</u>	<u>REPRESENTING</u>
John G. Lamb	U.S. Nuclear Regulatory Commission (NRC)
Mike Markley	NRC
Rick Scully	NRC
Summer Sun	NRC
Matt Hamm	NRC
Gurijendra Bedi	NRC
Tom Scarbrough	NRC
Brian Wittick	NRC
Diana Woodyatt	NRC
DeLisa Pournaras	Southern Nuclear Operating Company (SNC)
Ken Lowery	SNC
Amy Chamberlain	SNC
Ryan Joyce	SNC
James Bradford	SNC
Robert McGowen	True North – SNC Contractor
Damian DeLongchamp	True North – SNC Contractor
Maria Luisa Garcia Heras	Tecnatom - Public

SUBJECT: SUMMARY OF DECEMBER 1, 2022, OBSERVATION PRE-SUBMITTAL MEETING HELD WITH SOUTHERN NUCLEAR OPERATING COMPANY, INC., REGARDING A PROPOSED LICENSE AMENDMENT REQUEST FOR VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2 (EPID L-2022-LRM-0094) DATED DECEMBER 5, 2022

DISTRIBUTION:

PUBLIC	RidsNrrLAKGoldstein Resource	ABlamey, Region 2
Branch Reading	RidsOgcRp Resource	TMorrissey, Region 2
RidsAcrsAcnw_MailCTR Resource	RidsRgn2MailCenter Resource	DWoodyatt, NRR
RidsNrrDorLpl2-1 Resource	VCusumano, NRR	BWittick, NRR
RidsNrrPMVogtle Resource	MMarkley, NRR	
RidsNrrPMFarley Resource		

ADAMS Accession No. PKG ML22329A021 Meeting Notice ML22312A415 Meeting Summary ML22336A081 Slides ML22329A019 and ML22335A554

OFFICE	NRR/DORL/LPL2-1 /PM	NRR/DORL/LPL2-1/LA	NRR/DSS/SCP/BC	NRR/DORL/LPL2-1/BC
NAME	JLamb	KGoldstein	BWittick	MMarkley
DATE	12/1/2022	12/05/2022	12/2/2022	12/5/2022
OFFICE	NRR/DORL/LPL2-1/PM			
NAME	JLamb			
DATE	12/5/2022			

OFFICIAL RECORD COPY