

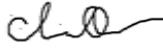



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001


January 3, 2023

MEMORANDUM TO: Laura A. Dudes, Regional Administrator
Region II

Andrea D. Veil, Director
Office of Nuclear Reactor Regulation

FROM: Christopher G. Miller, Director  Signed by Miller, Christopher
Division of Reactor Oversight on 12/23/22
Office of Nuclear Reactor Regulation

Victor Hall, Director  Signed by Hall, Victor
Vogtle Project Office on 12/21/22
Office of Nuclear Reactor Regulation

Omar R. Lopez-Santiago, Director  Signed by Lopez-Santiago, Omar
Division of Construction Oversight on 01/03/23
Region II

SUBJECT: REVISED CHARTER FOR THE VOGTLE READINESS GROUP
TO OVERSEE THE TRANSITION TO OPERATIONS FOR
VOGTLE UNITS 3 AND 4

This memorandum introduces a second revision of the charter for the Vogtle Readiness Group (VRG). The VRG provides the necessary oversight and coordination of U.S. Nuclear Regulatory Commission (NRC) activities up to and including the transition to operations at Vogtle Electric Generating Plant (Vogtle), Units 3 and 4. This update reflects the current state of the Vogtle project, following the NRC's successful completion of the first finding under 10 CFR 52.103(g), which authorized fuel load at Unit 3.

The NRC instituted the VRG, consistent with "Watts Bar Nuclear Plant Unit 2 Construction Lessons Learned," dated October 31, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17356A269), and Recommendation 10 of "ITAAC Closure and Verification Demonstration Final Report," dated June 1, 2017 (ML17135A415). The original VRG charter was revised in a memorandum, "Revised Charter for the Vogtle Readiness Group to Over the Transition to Operations for Vogtle Units 3 and 4," dated May 24, 2019. Members of the VRG include the Office of Nuclear Reactor Regulation (NRR), Region II, the Office of Nuclear Security and Incident Response (NSIR), and the Office of the General Counsel (OGC).

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The VRG is responsible and accountable for ensuring that NRC's activities on Vogtle Units 3 and 4 are implemented in accordance with the NRC's Principles of Good Regulation and in accordance with its reasonable assurance safety and security mission. The VRG's responsibilities include NRC inter-office coordination, and communications during construction; preoperational, hot functional, and startup testing; and transition to the Reactor Oversight Process after fuel load of Vogtle Units 3 and 4. The latest revision of the VRG Charter expands the VRG's responsibilities in overseeing a successful transition of both Units 3 and 4 from construction to operations; which includes the addition of tracking late-filed allegations for any emergent safety issues, retirement of the former Integrated Project Plan, and initiation of the formal lessons learned effort, which the NRC expects to complete once Unit 4 starts commercial operations.

The VRG serves as the focal point to ensure the effective communication of status and issues across NRC offices and to NRC management, the Commission, the licensee, and other external stakeholders. The VRG will be in effect until Vogtle Units 3 and 4 achieve commercial operation or until a point mutually agreed upon by the Director of NRR and the Regional Administrator, Region II.

Enclosure: Vogtle Readiness Group
Charter

CHARTER

VOGTLE READINESS GROUP Revision 2

PURPOSE

The U.S. Nuclear Regulatory Commission (NRC) formed the Vogtle Readiness Group (VRG) to proactively identify and promptly resolve licensing, inspection, and regulatory challenges that could impact the Vogtle construction project.

OBJECTIVES

The VRG provides coordination, oversight, high-level assessments, and management direction of NRC activities associated with the licensing, inspection, testing, and operation of the Vogtle, Units 3 and 4. The VRG serves as the hub for communications with the Commission, the Executive Director for Operations, across NRC offices, the licensee (i.e., Southern Nuclear Operating Company (SNC)), and external stakeholders, including the public.

FRAMEWORK

The VRG is an assessment and oversight group co-chaired by the Directors of:

- The Office of Nuclear Reactor Regulation's (NRR's) Vogtle Project Office (VPO)
- NRR's Division of Reactor Oversight (DRO)
- Region II's Division of Construction Oversight (DCO)

The VRG reports to the Director of NRR and Region II's Regional Administrator. Other NRC organizations participate in the VRG as members and supporters. These partners play critical regulatory roles for the project. They are invited to the VRG to actively participate to stay up to-date on the project status, report on their areas of responsibility, and coordinate in finding solutions to regulatory challenges. These partners include:

Members:

- Office of Nuclear Security and Incident Response (NSIR):
 - Division of Physical and Cyber Security Policy
 - Division of Preparedness and Response
- Office of the General Counsel (OGC)

Support:

- Region II:
 - Division of Reactor Safety (DRS)
 - Division of Reactor Projects (DRP)
- NRR:
 - Division of Operating Reactor Licensing (DORL)
 - Division of Risk Assessment (DRA)

VRG co-chairs and participants may delegate authority and participation at VRG meetings. Designees should be empowered to act and to allocate resources. The VRG may make decisions when a quorum exists. A quorum consists of two co-chairs and two other members (or their alternates) present at a meeting. Staff from other offices and regions may assist the VRG in its activities.

The VRG aims to keep the various organizations working together to solve regulatory challenges. NRC organizations and staff retain their responsibility for the activities related to licensing, inspection, allegations, and assessment of Vogtle.

This charter defines the responsibilities for the VRG. In March 2018, the NRC established the VRG through the original charter (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18059A273). The VRG revised the charter in May 2019 (ML19108A228).

The VRG will be in effect until Unit 4 starts commercial operation or until a point agreed upon by the NRR's Director and Region II's Regional Administrator.

ACTIVITIES

The VRG meets its objectives by prioritizing resource management, project planning and coordination, communications, and oversight.

Resource Management

The VRG facilitates resource prioritization across organizational boundaries to meet inspection and licensing objectives as needed, including resources for the following:

- Inspection
- Licensing
- ITAAC review, inspection, and verification
- Staff training
- Allegations
- Transition to Operation oversight

Project Planning and Coordination

The VRG oversees overall project planning and coordination among the NRC offices participating in licensing, oversight, and ITAAC closure verification. Oversight includes inspection of construction, operational programs, preoperational testing, and startup testing oversight. To maintain accountability, VRG activities include:

- Ensuring that the NRC conducts licensing activities and inspections in a timely manner, integrated with the licensee's schedule to support construction and operational activities, the transition to operations, and the implementation of the Construction Reactor Oversight Process (cROP) and the Reactor Oversight Process.
- Ensuring that responsible offices establish project leads and commit resources to meet due dates.

- Facilitating expedited changes to inspection support documents to support timely inspections (e.g., procedures, inspection planning documents.)
- Identifying any inspection, licensing, allegations, and startup challenges for resolution by the appropriate office before they unnecessarily impact project schedules.
- Identifying regulatory gaps and develop regulatory solutions, coordinated across responsible organizations.
- Supporting potential hearings on ITAAC and licensing actions.
- Supporting the petition process under 10 CFR 52.103(f).
- Supporting agency efforts to make 10 CFR 52.103(g) findings.
- Ensuring safety remains a priority in NRC decisions and that decisions are made in accordance with the Principles of Good Regulation.

Communications

The VRG serves as the focal point for communications on the Vogtle project. The VRG's stakeholders include: the Commission, the Executive Director for Operations, NRC partner offices, the licensee (i.e., Southern Nuclear Operating Company (SNC)), and external stakeholders including the public.

Communications include periodic status briefings to the Director of NRR and the Regional Administrator, Region II. The VRG has typically held these briefings before quarterly site executive meetings at the Vogtle site.

The VRG is committed to communicating with the public and stakeholders and has held several public meetings. The VRG has hosted these meetings near Vogtle, at NRC Headquarters, and virtually. During the past two years, standalone public VRG meetings were lightly attended. As a result, the VRG plans to continue leveraging other planned meetings, such as the End of Cycle plant assessments.

The VRG maintains a public web page and relies on NRC's extensive public outreach regarding Vogtle on a regular basis. This includes updates to its NRC's website (other than to the VRG-specific page), use of social media, and many public meetings for specific topics (e.g., weekly planned public meetings on licensing actions)

The scope of VRG communications include:

- Maintain a communication plan with input from each of the Headquarters' offices and Region II. Oversee plan implementation to inform key stakeholders of the regulatory status. Coordinate with the Office of Public Affairs and the Office of Congressional Affairs.
- Maintain talking points on the status of the Vogtle project for use in senior NRC management briefings, bringing attention to issues of high interest.
- Communicate status of NRC activities, including licensing and technical issues that could impact the project timeline.
- Meet periodically with the licensee to discuss progress of construction oversight, pre-operation and startup oversight, licensing, and ITAAC closure verification.

- Promptly elevate high interest issues with NRC and licensee management, including late-filed allegations, as appropriate.
- Ensure effective coordination among NRR, Region II, NSIR, and OGC.
- Conduct periodic public meetings with external stakeholders, as appropriate, for effectiveness, openness, and transparency.
- Document meetings in summaries, including tracking action items and working together to drive toward results.

Oversight

The scope of VRG activities, in the area of oversight, include the following:

- Maintain awareness of construction status.
- Assess ongoing NRC inspections and promptly and safely resolve related technical and regulatory issues.
- Oversee coordination of safety, physical and cyber security, and emergency planning interfaces between the units under construction and the operating units on the same site and ensure that issues in these areas are communicated to affected NRC staff.
- Review dashboards for timeliness and effectiveness. Review agency metrics to monitor consistency and effectiveness of inspections, ITAAC Closure Notification (ICN) actions, and other activities, using the following tools:
 - License amendment request tracking database
 - Inspection of submitted and upcoming ICNs
 - ICN closure tracking (Verification of ITAAC Closure, Evaluation, and Status (VOICES))
 - Inspection issues resolution metrics (technical assistance requests, violations, allegations)
- Identify issues that affect any of these oversight functions and facilitate their timely resolution.
- Provide support to the ITAAC hearing process.

VRG MEETING FREQUENCY

The VRG holds monthly internal meetings and had been holding monthly combined meetings with SNC. Since the start of the pandemic, the VRG has successfully held its internal meetings virtually, most recently using Microsoft Teams. The VRG co-chairs typically travel to the Vogtle site for the combined meetings. The monthly periodicity of the internal meetings has helped ensure that the VRG can identify and track new challenges. The monthly pace of combined meetings was also well suited for critical communication during the final stretch leading to the 52.103(g) finding for Unit 3. Following the successful completion of the first finding, the NRC will face less first-of-a-kind regulatory challenges and expects a more predictable pace for the completion of Unit 4. As a result, the VRG will move to quarterly combined meetings starting in 2023, while continuing with monthly internal meetings. This pace will ensure adequate communications without compromising the success of this important project, while realizing

some efficiencies in time and travel. If the need arises, the VRG co-chairs will adjust the frequency of the meetings to ensure that emergent issues are promptly resolved.

RETIREMENT OF THE INTEGRATED PROJECT PLAN

The VRG designed an Integrated Project Plan (IPP) to link all regulatory activities and milestones to SNC's construction schedule. The first version of the IPP used SNC's proprietary schedule information managed in Oracle Primavera. The use of this detailed schedule information allowed the NRC to see changes to its upcoming work in near real-time. This was critical when the construction schedule remained dynamic, and the NRC was still building confidence in being able to make a successful 52.103(g) finding. The IPP allowed the NRC to forecast work and make potential program changes. Briefings on the IPP were regular fixtures at VRG meetings and allowed managers to quickly focus on the most critical areas. The IPP was successful for the NRC to validate and demonstrate its regulatory readiness. Maintaining the IPP did require specialized expertise in Oracle Primavera and dedicated resources. Therefore, in 2020, the VRG retired "version 1.0" of the IPP, linked to Oracle Primavera, choosing to track milestones using tools in the MS Office suite. These tools have been successful in predicting NRC actions needed for upcoming regulatory milestones. The VRG plans to continue to track new project milestones to effectively manage the NRC's work using the greater flexibility of the MS Office tools.

LATE-FILED ALLEGATIONS PROCESS

The NRC successfully implemented its late-filed allegations process for Unit 3. The NRC expects to repeat that success on Unit 4 and will leverage the VRG's ability to inter-connect affected offices. The VRG helps ensure that additional resources and tactical strategies are implemented, if needed, to determine if ITAAC are impacted by allegations during this specific time period; and consistent with "Implementation Guidance for Late-Filed Allegations Related to the Title 10 of the *Code of Federal Regulations* (10 CFR) 52.103(g) Finding for Vogtle Electric Generating Plants Units 3 and 4" (ML20202A439).

LESSONS LEARNED WORKING GROUP

The VRG actively participates in the Part 52 lessons learned working group. Launched in July 2021, the initiative aims to assess NRC's performance and identify best practices and lessons learned to enhance future construction regulatory activities. The groups charter is available at ML21160A031.

REVISIONS TO THE CHARTER

The co-chairs are jointly authorized to make changes to this charter that do not reduce its overall effectiveness in meeting the objectives delineated in the project priorities, such as changes in membership, with notification of all changes being communicated to the undersigned Office Directors, the General Counsel, and the Regional Administrator, Region II. The communication will occur prior to the change being implemented.

Revised Charter for the Vogtle Readiness Group to Oversee the Transition to Operations for Vogtle Units 3 and 4 DATE January 3, 2023

DISTRIBUTION:

ADAMS Accession No.: Memo ML22355A032

OFFICE	NRR/VPO/VPOB	NRR/VPO/VPOB	NRR/DRO	R-II/DCO
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DATE	Dec 21, 2022	Dec 21, 2022	Dec 23, 2022	Jan 3, 2023

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