

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

March 1, 2023

- LICENSEE: Southern Nuclear Operating Company, Inc.
- FACILITY: Vogtle Electric Generating Plant, Units 1 and 2
- SUBJECT: SUMMARY OF FEBRUARY 13, 2023, 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-2023-LRM-0008)

On February 13, 2023, 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 to revise Technical Specifications (TS) 2.1.1, "Reactor Core Safety Limits;" TS 3.3.1, "Reactor Trip System (RTS) Instrumentation;" TS 3.4.1, "Reactor Coolant System (RCS) Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits;" and TS 5.6.5, "Core Operating Limits Report (COLR);" to adopt most of the TS and COLR changes described in Appendix A and Appendix B of Westinghouse topical report WCAP-14483-A, "Generic Methodology for Expanded Core Operating Limits Report," to relocate several cycle-specific parameter limits from the TS to the COLR.

SNC is proposing to follow the guidance of technical specification task force change traveler TSTF-339-A, Revision 2, "Relocate TS Parameters to COLR." In addition, SNC proposes to modify Vogtle, Units 1 and 2, TS 5.6.5, "Core Operating Limits Report (COLR)," to include WCAP-8745-P-A and WCAP-11397-P-A, and to revise the TS applicability for WCAP-9272-P-A, in the list of the NRC approved methodologies used to develop the cycle specific COLR.

The NRC-approved TSTF-339 is contained in (Agencywide Documents and Access Management System (ADAMS) Accession No. ML003723269). The NRC-approved safety evaluation for the topical report WCAP-14483-A was accepted for referencing in licensing applications on January 19, 1999 (ML020430092).

A list of attendees is provided as an Enclosure.

On February 1, 2023 (ML23032A045), 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 presented a draft TSTF-339 LAR contained in ML23037A921.

SNC representatives discussed the following topics: (1) summary description, (2) detailed description, (3) reason for the proposed change, (4) description of the proposed change, (5) basis for the changes, (6) variations, and (7) schedule.

The NRC staff questioned when SNC would need the proposed LAR. SNC stated that the proposed LAR would be needed one year from the date of the submittal and be implemented in fall 2024 for Vogtle, Unit 1, and in spring 2025 for Vogtle, Unit 2.

The NRC staff asked if SNC is requesting approval for adopting TSTF-339 consistent with WCAP-14483-A with variations or if SNC is proposing to adopt WCAP-14483-A with variations and a limited linkage to TSTF-339.

The NRC questioned if some of the proposed changes were outside the scope of cycle-specific parameter limits as discussed in NRC Generic Letter 88-16, "Removal of Cycle-Specific Limits from Technical Specifications," dated October 4, 1988 (ML031130447).

The NRC staff questioned if the total RCS flow would be retained in the TSs.

The NRC staff questioned the accuracy of variables in the proposed overpower delta temperature equation.

The NRC noted that the precedents alone are insufficient to support an approval and stated that a plant-specific basis is needed to justify the proposed changes.

The NRC questioned the basis for asserting need based on regulatory burden when core-specific reload amendments have not been submitted in many years. The licensee acknowledged the amendment is needed for future flexibility.

The NRC asked when SNC plans to submit the proposed LAR. SNC stated that the proposed LAR would be submitted no later than March 31, 2023.

There were no members of the public in attendance.

The NRC staff did not consult with the SNC personnel, and the NRC staff did not make any 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 11:59 am Eastern Time (ET).

Please direct any inquiries to me at <u>John.Lamb@nrc.gov</u> 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

FEBRUARY 13, 2023, PRE-SUBMITTAL MEETING WITH SOUTHERN NUCLEAR COMPANY

REGARDING A PROPOSED TSTF-339

LICENSE AMENDMENT REQUEST

VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2

ATTENDEE	REPRESENTING		
John G. Lamb	U.S. Nuclear Regulatory Commission (NRC)		
Mike Markley	NRC		
Clinton Ashley	NRC		
Fred Forsaty	NRC		
William Roggenbrodt	NRC		
DeLisa Pournaras	Southern Nuclear Operating Company (SNC)		
Ken Lowery	SNC		
Amy Chamberlain	SNC		
James Farr	SNC		
Matt Leonard	SNC		
Eddie Grant	Excel Services – SNC Contractor		

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				Meeting Summary ML23048A068 Meeting Slides-SNC Draft TSTF-339 LAR ML23037A921		
OFFICE	DORL/LPL2-1/PM	DORL/LPL2-1/LA	DSS/STSBB/BC	DORL/LPL2-1/BC	DORL/LPL2-1/PM	
NAME	JLamb	KGoldstein	VCusumano	MMarkley	JLamb	
DATE	2/13/2023	02/17/2023	02/17/2023	03/01/2023	03/01/2023	

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