

SUNI Review Complete
Template=ADM-013
E-RIDS=ADM-03

ADD: Billy Gleaves, Anne
Fream, Mary Neely
Comment (2)
Publication Date: 2/2/2023
Citation:88 FR 7112

As of: 3/8/23, 6:06 AM
Received: March 06, 2023
Status: Pending_Post
Tracking No. lex-8jzy-mz41
Comments Due: March 06, 2023
Submission Type: Web

PUBLIC SUBMISSION

Docket: NRC-2008-0252

Receipt and Availability of Application for a Combined License; Southern Nuclear Operating Company

Comment On: NRC-2008-0252-0206

Southern Nuclear Operating Company, Inc.; Vogtle Electric Generating Plant, Unit 3

Document: NRC-2008-0252-DRAFT-0018

Comment on FR Doc # 2023-02204

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General Comment

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Subject: Comment on Amendment 189 to Combined License (COL) NPF-91, for Plant Vogtle Unit 3
(Document ID: NRC-2008-0252-0206)

I appreciate this opportunity to comment on the license amendment for Plant Vogtle Unit 3 that, according to the Nuclear Regulatory Commission (NRC) Federal Register Notice, was issued on February 13th, 2023.

The amendment is briefly described there as follows:

"The COL amendment involved changes to Vogtle Electric Generating Plant (VEGP), Unit 3, COL appendix A, Technical Specifications. Specifically, the amendment involved changes necessary to facilitate rework of two piping supports to address elevated piping line vibration located on the "B" and "D" Automatic Depressurization System (ADS) stage 4 lines that discharge to the No. 2 steam generator compartment."

Although I am a lay commenter, I feel qualified to make two points about this decision, both of which affect me as a Georgia Power ratepayer and someone who lives only one hour away from Plant Vogtle.

A. The first point is a matter of common sense. In the related document "SAFETY EVALUATION BY

THE OFFICE OF NUCLEAR REACTOR REGULATION RELATED TO AMENDMENT NO. 189", it is explained that "Recently, during precritical testing, elevated vibrations were found in the "B" and "D" paths of the ADS stage 4 line which discharge to the No. 2 steam generator compartment. Subsequent investigation of the vibrations revealed that certain piping supports were missing their U-bolt interface plates that make up part of a dynamic pipe clamp assembly. The missing interface plates were identified as a non-conforming condition."

Certainly, installing the missing items is the right thing to do here. However, it seems clear that it is also necessary to find out how it could be that the missing interface plates were not installed in the first place - - and, even more importantly -- what else might be missing or amiss as a consequence of the same root cause of that 'non-conforming condition.' The last thing we should be doing at this point is trying to avoid shutdown and cooldown of the plant before we understand how this occurred.

In addition to the actions being taken regarding the missing items, an investigation ought to be performed to (i) determine exactly how it came about that the item was missed; and (ii) determine what other nonconformances could have resulted from the cause, omission, neglect, or situation determined to be the cause of the plates not being installed as the design documents required them to be. The results of this investigation should be reported to the public. It is unacceptable that important issues like this are unknown to the public who are both paying for and deeply impacted by this project, especially if anything goes wrong upon startup or shortly thereafter.

B. My second point is also a matter of common sense. The approach of revising the Technical Specifications by relaxing the Limiting Conditions of Operation (LCOs) on the plant to avoid taking the shutdown and cooldown actions the existing TSs require certainly adds risk. Regardless of the reasoning used to argue that there are no significant hazards, this is necessarily the case when there is reason to doubt that the plant is in conformance with the approved design, as the missing interface plates that gave rise to pipe vibrations indicate.

Finally, I note that on March 2nd I learned of another amendment, a further relaxing of LCOs and TSs. And why? For just this reason: things are not in conformance with the design and need to be fixed. This also indicates it is unwise to push against the limits of prudence.

Plant Vogtle units 3 and 4 are seven years late and \$14 billion over budget. There have been dozens of management failures as well as safety and testing violations documented in filings at the Georgia Public Service commission by PSC staff and by independent construction monitors Don Grace and William Jacobs. Reading their reports shocks the conscience with how poorly managed this project is and the extensive failures documented in every report. These are the reasons I do not want the U.S. Nuclear Regulatory Commission to further relax LCOs and TSs.

Given the harsh realities of Southern Company's influence in Georgia, Georgians only have you, the Nuclear Regulatory Commission, to rely on for safety. Please stop this foolish trajectory to criticality and do what common sense indicates is prudent: Please perform an investigation as to the cause of these nonconformities and address that issue first. Once the plant has achieved criticality things will be much more complicated -- and much riskier. It is better and safer to sort out the problems now and fix everything that can still be found at this point.