



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

August 30, 2023

LICENSEE: Southern Nuclear Operating Company
FACILITY: Vogtle Electric Generating Plant, Units 3 and 4
SUBJECT: SUMMARY OF AUGUST 17, 2023, MEETING WITH SOUTHERN NUCLEAR OPERATING COMPANY

On August 17, 2023, at 9:00 a.m. Eastern Daylight Time (EDT), the U.S. Nuclear Regulatory Commission (NRC) held a virtual public meeting with representatives of Southern Nuclear Operating Company (SNC or the licensee). The purpose of the meeting was to discuss the SNC-proposed changes to the license including technical specifications (TS) for Vogtle Electric Generating Plant (VEGP) Units 3 and 4. This discussion centered on VEGP Units 3 and 4 License Amendment Request (LAR) 22-002, "Technical Specification 3.8.3, Inverters – Operating, Completion Time Extension," dated January 3, 2023 (Agencywide Documents Access and Management (ADAMS) Accession No. ML23003A797) and supplement dated June 13, 2023 (ML23164A270), specifically to a second-round request for additional information (RAI) sent to SNC on August 9, 2023 (ML23188A151).

On June 29, 2023, the NRC held a public meeting with SNC on this same LAR to discuss SNC's responses to the first-round RAI issued by the NRC on May 17, 2023 (ML23187A574). During the June 29, 2023, meeting SNC requested the NRC issue a second-round RAI to capture the additional information needed by staff to complete its review of LAR 22-002. The August 17, 2023, meeting was held at the request of SNC to seek clarification on the draft second-round RAI.

With regard to RAI #2 SNC wanted to ensure that their anticipated response was in alignment with the RAI question. Dan Williamson, SNC Licensing, reviewed RAI #2 which discusses the uncertainty analyses and sensitivity studies from the Probabilistic Risk Assessment (PRA). Alex Gilbreath, SNC, discussed the proposed SNC response regarding the key assumptions in the uncertainty notebooks for certain hazards and for those hazards potentially affecting the application, what sensitivities were done. The NRC staff confirmed that SNC understands the request.

With regard to RAI #4, SNC stated the request emphasized practical considerations for test and maintenance and SNC expressed a view that the maintenance timelines should not override other deterministic criteria and information provided in the first response to RAI #4. SNC referred to Staff Requirements Memo (SRM) for SECY-19-0036 on “Application of the Single Failure Criterion to NuScale Power LLC’s Inadvertent Actuation Block Valves” which states that “the staff should apply risk-informed principles when strict, prescriptive application of deterministic criteria ... is unnecessary to provide for reasonable assurance of adequate protection of public health and safety.” SNC also discussed Regulatory Guide 1.177, “Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications,” guidance regarding practical considerations to judge acceptability of the proposed change. SNC stated that the proposed completion time does not impact the practicality of returning the plant to a fully operable condition in a timely manner or offer an incentive to delay repair or restoration activities. SNC believes that practical considerations include allowing prudent scheduling and utilization of resources to prioritize more significant test and maintenance activities without being constrained by an artificially short completion time. SNC is aware that the requested change in LAR 22-002 does minimize the potential for regulatory interactions such as requesting notification for enforcement discretion or an emergency LAR, and those are practical considerations. SNC further discussed the requested maintenance timelines noting that the timelines include details regarding unexpected circumstances and pre-maintenance activities. SNCs clarification in part focused on the ‘justification’ for the 14-day completion time versus the 7-day completion time approved for other facilities. SNC stated the completion times don’t always align with the expected repair times so they are concerned with the RAI’s statement that the timeline “should not include pre-maintenance activities.” An example was given of the Palo Verde timeline with pre-maintenance activities like job planning and troubleshooting, preparing the work order, and pre-job briefs. NRC staff stated that the RAI response should include normal maintenance activities, such as recurring pre-maintenance activities but activities that occur only once should not be included in the response. The staff pointed out that an essential part of the RAI is in the last sentence of the paragraph which states the “estimated repair time should include those maintenance tasks and plant activities specific to the repair and restoration of the inverter which can also be based on plant operating experience or vendor recommendations.” The staff also framed the expected scope and level of detail of the expected response. SNC stated that the timeline may not be of a 14-day period however the overall application is intended to support that.

SNC stated that they are not requesting changes to the second-round RAI. They accept the August 9, 2023, version of the second-round RAI as a “final RAI” and plan to submit their response by the end of August 2023.

A member of the public asked questions of the staff regarding, first, the unique nature of this facility, second, given the increased electricity demand on the grid how does NRC ensure the reliability and safety of these facilities in situations in which the facilities need offset power, third, how long can the passive systems keep the reactor cool, and lastly, are the two units for Vogtle similar for the inverters and other equipment for Vogtle Units 3 and 4. In response to these questions the staff made the following statements:

- The specific model of the inverter used at VEGP Units 3 and 4 is unique but their function is similar to components typically used in other nuclear power plants.
- Vogtle 3 and 4 are AP1000 units which rely on passive systems to cool the reactors. In addition, these units are designed to operate in “island mode” which allows them to supply their own electrical power without the need for offsite power.

- By incorporating lessons learned from the Fukushima accident in Japan, the infrastructure in the US is now available to provide external supplies and equipment needed to indefinitely respond to an emergency at a nuclear facility.

The meeting notice and agenda are available in ADAMS (ML23223A065). A list of attendees is enclosed. There were approximately 24 participants on the call, including NRC staff, SNC staff, and public. The meeting ended at 10:05 a.m. EDT. The staff did not receive any Public Meeting Feedback forms.

Please direct any inquiries to me at 301-415-5848 or Bill.Gleaves@nrc.gov.

Sincerely,



Signed by Gleaves, William
on 08/30/23

William (Billy) Gleaves, Senior Project Manager
Vogtle Project Office
Office of Nuclear Reactor Regulation

Docket Nos. 52-025, 52-026

Enclosure:
List of Attendees

cc: Listserv

LIST OF ATTENDEES

August 17, 2023

NRC Meeting with SNC

Name	Organization
Billy Gleaves Tanny Santos Jim Gaslevic Lauren Nist Wendell Morton Sheila Ray Charles Moulton Thinh Dinh Ed Kleeh Jen Whitman Matt Hamm Andrea Johnson Mahmoud Jardaneh Harry Wagage	NRC
Keith Dorsey Dan Williamson Eddie Grant Tony DeSalvatore Alex Gilbreath Larry Dencker Jamie Coleman Ed Everett Amy Chamberlain	SNC and Contractors
Thomas Saporito	Members of the Public

Vogle Units 3 and 4 LAR-22-002 Technical Specification 3.8.3 Summary of 08-17-23 Public Meeting
DATE August 30, 2023

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ADAMS Accession No.: Ltr ML23230A021

OFFICE	NRR/VPO/VPOB	NRR/DEX/ELTB	NRR/DRA/APLB	NRR/VPO/VPOB
NAME	WGleaves WG	WMorton WM	JWhitman JW	CSantos CS
DATE	Aug 22, 2023	Aug 28, 2023	Aug 28, 2023	Aug 29, 2023
OFFICE	NRR/DANU/UAL2	NRR/VPO/VPOB		
NAME	MJardaneh MJ	WGleaves WG		
DATE	Aug 30, 2023	Aug 30, 2023		

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