



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

January 30, 2024

LICENSEE: Southern Nuclear Operating Company, Inc.

FACILITY: Vogtle Electric Generating Plant, Units 1, 2, 3, and 4, Hatch, Units 1 and 2, and Farley, Units 1 and 2

SUBJECT: SUMMARY OF OBSERVATION PRE-SUBMITTAL MEETING HELD WITH SOUTHERN NUCLEAR OPERATING COMPANY, INC. ON JANUARY 8, 2024, REGARDING A PROPOSED LICENSING ACTION REQUEST FOR VOGTLE ELECTRIC GENERATING PLANT, UNITS 1, 2, 3, AND 4; EDWIN I. HATCH NUCLEAR PLANTS, UNITS 1 AND 2; AND JOSEPH M. FARLEY NUCLEAR PLANTS, UNITS 1 AND 2 (EPID L-2023-LRM-0106)

On January 8, 2024, 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 discuss its plan to submit a licensing action request for Vogtle Electric Generating Plant (Vogtle), Units 1, 2, 3, and 4, Edwin I. Hatch Nuclear Plant (Hatch), Units 1 and 2, and Joseph M. Farley Nuclear Plant (Farley), Units 1 and 2.

SNC is proposing to transition the Vogtle, Units 3 and 4, Nuclear Development Quality Assurance Manual (NDQAM) to the SNC Fleet Quality Assurance Topical Report (QATR) while also making changes to the SNC Fleet QATR to adopt aspects of the Nuclear Development Quality Assurance Manual (NDQAM) which may reduce commitments in the QATR.

A list of attendees is provided as an Enclosure.

The meeting agenda was the following:

TIME	TOPIC	SPEAKER
10:00 am	Introductions	NRC/SNC
10:05 am	Licensee Slide Presentation	NRC/SNC
10:35 am	Discussion	NRC/SNC
10:45 am	Public Comments/Questions	Public
10:55 am	Concluding Remarks	NRC
11:00 am	Adjourn	

On December 11, 2023, the meeting was noticed on the NRC public webpage and in the Agencywide Documents and Access Management System (ADAMS) as Accession No. ML23345A125.

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

SNC presented slides contained in ML23361A081 and discussed the following topics: (1) the reasons for proposed change, (2) an overview of the licensing action request, specifically, the non-editorial changes to the QATR, (3) precedent, and (4) the schedule.

SNC Proposed Changes

SNC is proposing to transition the requirements contained in the Vogtle, Units 3 and 4, NDQAM to the SNC Fleet QATR. The changes would include several non-editorial sections of the Fleet QATR. SNC stated that the purpose is to align all SNC plants to a common quality assurance program description (QAPD), because the SNC operating plants (except Vogtle, Units 3 and 4) use a common QAPD in its QATR. Currently, Vogtle, Units 3 and 4, has separate QAPD – NDQAM. SNC stated that this proposed change would integrate Vogtle, Units 3 and 4, NDQAM to the QATR, as well as update the QATR to incorporate improvements in formatting and content.

Discussion

The NRC staff noted an inconsistency between the Vogtle, Units 3 and 4, Technical Specifications (TSs) and current TSs for Vogtle, Units 1 and 2, Hatch, Units 1 and 2, and Farley, Units 1 and 2, regarding a statement in TS 5.2.1, “*Onsite and Offsite Organizations.*” Vogtle, Units 3 and 4, TS 5.2.1.a (last sentence) states: “These requirements including the generic titles of those personnel fulfilling the responsibilities of the positions delineated in these TS shall be documented in the FSAR, whereas Vogtle, Hatch and Farley TSs state that TS 5.2.1 requirements shall be documented in the FSAR or the SNC Quality Assurance Topical Report.” SNC representative stated that it will evaluate the discrepancy.

The NRC staff requested clarification regarding which regulatory provision SNC expects the proposed amendments. SNC stated they are analyzing it under 10 CFR 50.54. SNC stated that it would be submitted under their normal process for a Quality Assurance (QA) Plan change using the Vogtle, Units 3 and 4, NDQAM as a template and would not submit a license amendment request under 10 CFR 50.90.

The NRC staff noted that the NDQAM for Vogtle, Units 3 and 4, was based on the template provided in Nuclear Energy Institute (NEI) 06-14, “*Quality Assurance Program Description,*” that was developed to assist the operating fleet with early site permit (ESP) and combined license (COL) applications. The NRC staff suggested SNC to examine the background and intent of NEI 06-14 and to consider how much they rely on the document if SNC does not plan on keeping its construction QA items.

The NRC staff questioned if the reference to American Concrete Institute (ACI) 549 will remain in the QATR. SNC stated there may be a related commitment, and, if so, it would expect to remain applicable only to Vogtle, Units 3 and 4, in the SNC Fleet QATR.

In response to NRC staff questions, SNC stated that Vogtle, Units 3 and 4, have a Corrective Action Program (CAP) for addressing conditions adverse to quality and plan to continue to use the CAP program to document any trending conditions adverse to quality and associated dispositions. The NRC staff asked, and the SNC representative clarified, that the new fleet QATR will be more based on Section 17.5, “*Quality Assurance Program Description - Design Certification, Early Site Permit and New License Applicants*” rather than Section 17.1, “*Quality Assurance During the Design and Construction Phases*” of NUREG-0800, “*Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition — Quality Assurance*” (Chapter 17).

SNC representative also clarified that SNC is considering upgrading to the Nuclear Information and Records Management Association standards described in Regulatory Guide (RG) 1.28 Rev. 6, “*Quality*

Assurance Program Criteria (Design and Construction).” Additionally, licensee stated that SNC is planning to adopt the SNC Fleet’s audit intervals and will reference the Safety Evaluation, dated June 17, 2005 (ML051570349) for justification to use across the SNC Fleet.

The NRC staff questioned the statement that SNC’s plans to delete references to RG 1.33 Rev. 2, “*Quality Assurance Program Requirements (Operation)*,” and noted that it is in the administrative controls section of the TS for the SNC fleet, including Vogtle, Units 3 and 4. SNC acknowledged the requirement and stated that SNC needs to check the Updated Final Safety Analysis Report (UFSAR) to verify, and that this particular change is specific to Vogtle, Units 3 and 4, which is described differently in the QATR. SNC stated that it will evaluate this concern prior to submitting the proposed licensing action request.

SNC representative expects to submit the proposed licensing action in the third quarter of calendar year 2024.

Finally, NRC staff asked if SNC plans to delete many construction requirements, and, if so, suggested SNC to consider any potential future construction plans.

There was no further discussion and the business portion of the meeting concluded. The NRC staff asked the public if there were any comments. There were none. There were two members of the public in attendance: one person on the bridge line (unidentified) and one person on Teams from General Electric Verona.

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 licensing action request. 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 10:55 a.m. Eastern Standard Time.

Please direct any inquiries to me at Andrea.Johnson@nrc.gov or at 301-415-2890.

/RA/

Andrea Johnson, Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-321, 50-348, 50-364, 50-366,
50-424, 50-425, 52-025, 52-026

Enclosure:
List of Attendees

cc: Listserv

LIST OF ATTENDEES

JANUARY 8, 2024, PRE-SUBMITTAL MEETING WITH SOUTHERN NUCLEAR COMPANY
REGARDING A PROPOSED LICENSE AMENDMENT REQUEST FOR VOGTLE ELECTRIC
GENERATING PLANT, UNITS 1,2, 3, AND 4; HATCH, UNITS 1 AND 2; AND FARLEY,
UNITS 1 AND 2 (EPID L-2023-LRM-0106

<u>ATTENDEE</u>		<u>REPRESENTING</u>
Andrea Johnson		U.S. Nuclear Regulatory Commission (NRC)
Mike Markley		NRC
John Lamb		NRC
Andrea Russell		NRC
Bobby Alekos		NRC
Ed Miller		NRC
Frankie Vega		NRC
Kerri Kavanagh		NRC
Ravi Grover		NRC
Theresa Buchanan		NRC
Keith Dorsey		Southern Nuclear Operating Company (SNC)
Amy Chamberlain		SNC
Matthew (Scott) Connelly		SNC
Robert Adams		SNC
William Garrett		SNC
Tracy Honeycutt		SNC
Adam Quarles		SNC
Ryan Joyce		SNC
Anthony (Tony) Parton		SNC
Kara Stacy		SNC
Ken Lowery		SNC
Nina Kasner		SNC
Gabrielle Schreier		GE Vernova

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RidsNrrPMFarley Resource		
RidsNrrPMHatch Resource		

ADAMS Accession Nos.:

PKG ML23361A086

Meeting Notice ML23345A125

SNC Slides ML23361A081

Meeting Summary ML24019A193

OFFICE	NRR/DORL/LPL2-1/PM	NRR/DORL/LPL2-1/PM	NRR/DORL/LPL2-1/LA	NRR/DSS/STSB/BC
NAME	AJohnson	JLamb	KGoldstein	SMehta
DATE	01/18/2024	01/19/2024	01/22/2024	01/19/2024
OFFICE	NRR/DRO/IQVB/BC	NRR/DORL/LPL2-1/BC	NRR/DORL/LPL2-1/PM	
NAME	KKavanagh	MMarkley	AJohnson	
DATE	01/19/2024	01/30/2024	01/30/2024	

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