



# **SNC Pre-Submittal Meeting**

**Fleet Quality Assurance Topical Report Revision  
to Incorporate Vogtle 3&4**

**February 10, 2025**

## Agenda

- Introductions & Meeting Purpose
- Background
- Proposed Changes
- Reason for the Proposed Changes
- Regulatory Basis
- Submittal Contents
- Schedule
- Discussion / Feedback

## INTRODUCTIONS

- Southern Nuclear Operating Company (SNC)
- Nuclear Regulatory Commission (NRC)

## MEETING PURPOSE

SNC is proposing changes to its Quality Assurance Program (QAP). Some of the changes represent reductions in commitment and must be submitted to the NRC in accordance with § 50.54(a)(4). The purpose of the meeting is to discuss the primary changes to the QAP as well as SNC's plan for submitting information to the NRC.

## BACKGROUND

SNC participated in a previous public meeting on this topic (ML23361A086):

- Meeting Notice – ML23345A125
- Pre-submittal Meeting Slides – ML23361A081
- Meeting summary – ML24019A193

## DESCRIPTION OF THE PROPOSED CHANGES

- The primary intent of the proposed change is to transition the Vogtle Electric Generating Plant (VEGP) 3&4 QAP from the Nuclear Development Quality Assurance Manual (NDQAM) to the fleet Quality Assurance Topical Report (QATR).
- The proposed QATR will become applicable for VEGP 3&4 and the associated docket numbers will be added to the cover page.
- Some of the revisions represent reductions in commitment for one or more of the SNC plants.

# Revise SNC QATR

## DESCRIPTION OF THE PROPOSED CHANGES

Example changes that represent a RIC at Farley, Hatch, and/or Vogtle 1&2:

- The Plant Review Board (PRB) meeting schedule is changing from “once per calendar month” to “on a periodic basis.”
- The quorum requirements of the Plant Review Board (PRB) are removed from the QATR in the proposed change.
- Removal of Appendix C (Surveillances)

## DESCRIPTION OF THE PROPOSED CHANGES

Example changes that represent a RIC at Vogtle 3&4:

- Remove the review of the internal audit program, conducted every 24 months, from the independent review function.
- Fire Protection program audit frequency

## DESCRIPTION OF THE PROPOSED CHANGES

### Example changes that represent a RIC for QATR and NDQAM:

- Removal of 'Nonconformance dispositions are reviewed for adequacy, analysis of quality trends, and reports provided to the vice president - site.
- Removal of 'Review of proposed changes to the ISFSI Technical Specifications or license.



## REASON FOR THE PROPOSED CHANGES

- Farley, Hatch, and VEGP 1&2 currently use a common QAP (the QATR); the proposed change will integrate VEGP 3&4's QAP commitments (from the NDQAM into the fleet's QATR).
- Aligns all SNC plants to a common QAP and allows maintaining one plan versus two.
- Updates the fleet QAP (QATR) to incorporate improvements in formatting and content.

## SUBMITTAL CONTENTS

- Cover letter
- Enclosure
  - Description of the Change
  - Reason for the Proposed Change
  - Basis for Concluding that the Revised Program Continues to Satisfy the Criteria of 10 CFR 50 Appendix B and the Previously Accepted Quality Assurance Program
  - Conclusion
  - References
- Attachment – RIC Table (see example on next slide)
- Attachment – Marked-up changes (affected pages with RICs annotated)
- Attachment – Clean-typed copy of the proposed QATR
- Note that additional documents can be made available during an audit (current version of the NDQAM, additional mark-ups, etc.)

# Revised SNC QATR

**RIC TABLE & MARKUP**  
Example & subject to change

RIC No.	QATR Version 28.0 Section/Part Proposed Change	Current QATR or NDQAM Section/Part Current Requirement	Justification for Change
5	<p><u>Part II, Subsection 18.1.1</u></p> <p>In the proposed change, the last sentence in Subsection 18.1.1 is revised to state, "In addition to audits, SNC may also provide oversight with surveillances."</p>	<p><u>QATR V27.0, Section 18</u></p> <p>"SNC has established the necessary measures and governing procedures to implement audits to verify that activities covered by this QATR are performed in conformance with the requirements established. The audit programs are themselves reviewed for effectiveness as a part of the overall audit process. In addition to audits, SNC commits to perform surveillances as described in Appendix C to this QATR."</p>	<p>This is a RIC for Farley, Hatch, and Vogtle 1&amp;2.</p> <p>[Justification to be provided in the submittal.]</p>

The submittal will present information that provides a direct line-of-sight between the RIC and the affected portions of the QATR.

The table provides a description of the change that represents a RIC, a description of current requirements in the QAP, and the justification for the change as reflected in the proposed QATR.

**SECTION 18- \_\_\_\_\_ AUDITS**

18.1. General

18.1.1. SNC has established the necessary measures and governing procedures to implement audits to verify that activities covered by this QATR are performed in conformance with the requirements established. The audit programs are themselves reviewed for effectiveness as a part of the overall audit process. In addition to audits, SNC ~~commits to perform~~ may also provide oversight with surveillances ~~as described in Appendix C to this QATR.~~ [5]

## **SCHEDULE**

- NRC Pre-submittal Meeting – February 10, 2025
- Submit Reductions in Commitment to NRC – March 2025
- Based upon the extent of changes, SNC would support an NRC audit following the submittal
- Requesting NRC approval in accordance with 10 CFR 50.54(a)

## **DISCUSSION & FEEDBACK**