From: John Lamb
Sent: Thursday, May 22, 2025 1:59 PM
To: Quarles, Adam Graham
Cc: Joyce, Ryan M.
Subject: For Your Action - RAI and RCI - SNC Fleet - 50.54(a) Request

Adam,

By letter dated January 23, 2025 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML25023A218), Southern Nuclear Operating Company (SNC, the licensee) submitted a request in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(a)(4), to change to the SNC Quality Assurance Topical Report (QATR) for Edwin I. Hatch Nuclear Plant, Units 1 and 2, Joseph M. Farley Nuclear Plant, Units 1 and 2, and Vogtle Electric Generating Plan (Vogtle), Units 1 and 2, and Nuclear Development Quality Assurance Manual (NDQAM) for Vogtle, Units 3 and 4. The proposed change would (1) adopt Regulatory Guide 1.8, Revision 4, "Qualification and Training of Personnel for Nuclear Power Plants" (ML19101A395), and (2) change the experience substitution for education from a rate of 6 semester credit hours for each year of related experience up to a maximum of 60 credit hours to a rate of 8 semester credit hours for each year of related experience up to a maximum of 80 credit hours in certain management positions, including Plant Manager, Operations Director (Operations Senior Manager), Maintenance Director (Maintenance Senior Manager), Training Director (Training Senior Manager), Chemistry Manager, and Radiation Protection Manager.

The NRC staff has determined that additional information is required for the staff to complete its review. The questions were discussed during a public meeting held on April 28, 2024 (ML25120A134). Please respond to the below request for additional information and request for confirmatory information by June 23, 2025.

If you have any questions, please contact me.

John G. Lamb, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

REQUEST FOR ADDITIONAL INFORMATION

By letter dated January 23, 2025 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML25023A218), Southern Nuclear Operating Company (SNC, the licensee) submitted a request in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(a)(4), to change to the SNC Quality Assurance Topical Report (QATR) for Edwin I. Hatch Nuclear Plant, Units 1 and 2, Joseph M. Farley Nuclear Plant, Units 1 and 2, and Vogtle Electric Generating Plan (Vogtle), Units 1 and 2, and Nuclear Development Quality Assurance Manual (NDQAM) for Vogtle, Units 3 and 4. The proposed change would (1) adopt Regulatory Guide 1.8, Revision 4, "Qualification and Training of Personnel for Nuclear Power Plants" (ML19101A395), and (2) change the experience substitution for education from a rate of 6 semester credit hours for each year of related experience up to a maximum of 60 credit hours to a rate of 8 semester credit hours for each year of related experience up to a maximum of 80 credit hours in certain management positions, including Plant Manager, Operations Director

(Operations Senior Manager), Maintenance Director (Maintenance Senior Manager), Training Director (Training Senior Manager), Chemistry Manager, and Radiation Protection Manager.

The NRC staff has determined that additional information is required for the staff to complete its review.

Regulatory Basis

The regulatory requirements for nuclear power plant QA programs are set forth in Appendix B, "*Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants*," to Title 10 of the *Code of Federal* Regulations (10 CFR) Part 50, "*Domestic Licensing of Production and Utilization Facilities*," and 10 CFR 50.54(a). In addition, the regulations in 10 CFR 50.120 provide regulatory requirements for training and qualification of nuclear power plant personnel.

Appendix B to 10 CFR Part 50 establishes the requirements for the design, fabrication, construction, and testing of nuclear power plant structures, systems, and components. Criterion II, "*Quality Assurance Program*," of Appendix B to 10 CFR Part 50, establishes requirements for indoctrination and training of personnel. Criterion II states, in part, that "*The program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained.*"

The regulation in 10 CFR 50.54(a), requires each nuclear power plant licensee subject to the requirements of Appendix B shall implement a quality assurance (QA) program. The regulation in 10 CFR 50.54(a)(4), sets forth the NRC's regulatory requirements regarding changes to a QA program description that are considered to be a reduction in commitment. Changes to a QA program description that do reduce commitments must be submitted to the NRC and receive approval prior to implementation.

The regulation in 10 CFR 50.120, requires each nuclear power plant licensee to establish, implement, and maintain a training and qualification program that is derived from a systems approach to training as defined in 10 CFR 55.4, and must provide for the training and qualification of various categories of nuclear power plant personnel.

The NRC staff used the following guidance:

- NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: [Light-Water Reactor] LWR Edition," Section 13.2.2, "Non-Licensed Plant Staff Training" (ML15006A129), provides guidance for the review of training programs for non-licensed plant staff.

- NRC RG 1.8, Revision 4, "Qualification and Training of Personnel for Nuclear Power Plants," June 2019 (ML19101A395), endorsed American National Standards Institute/American Nuclear Society (ANSI/ANS)-3.1-2014, "Selection, Qualification, and Training of Personnel for Nuclear Power Plants" with certain exceptions and clarifications that are listed in the Staff Regulatory Guidance section of RG 1.8, Revision 4. The ANSI/ANS-3.1-2014 standard was reaffirmed on February 4, 2020.

- NRC Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," dated December 12, 1995 (ML031110271), provides guidance for relocating requirements from the administrative

controls section of TSs in cases where adequate controls are provided by other methods.

Request for Additional Information

What is the basis and justification for the proposal to substitute experience for education at a rate of 8 semester credit hours for each year of related experience up to a maximum of 80 credit hours instead of a rate of 6 semester credit hours for each year of related experience up to a maximum of 60 credit hours?

Request for Confirmatory Information

Has SNC discussed with ANSI/ANS the proposed deviation from the standard or discussed the rationale why the proposed change was not adopted in prior standards development efforts?

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