

June 19, 2025

Docket Nos.:	50-321	50-348	50-424	52-025	NL-25-0235
	50-366	50-364	50-425	52-026	

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555-0001

Edwin I. Hatch Nuclear Plant Units 1&2  
Joseph M. Farley Nuclear Plant Units 1&2  
Vogtle Electric Generating Plant Units 1&2  
Vogtle Electric Generating Plant Units 3&4  
Response to Request for Additional Information Regarding  
Change to Quality Assurance Program to Adopt Regulatory Guide 1.8 Revision 4

Ladies and Gentlemen:

By letter dated January 23, 2025 [Agencywide Documents Access and Management System (ADAMS) Accession No. ML25023A218], Southern Nuclear Operating Company (SNC) requested U.S. Nuclear Regulatory Commission (NRC) approval of a proposed change to the SNC Quality Assurance Topical Report (QATR) and Nuclear Development Quality Assurance Manual (NDQAM). The proposed change would adopt Regulatory Guide 1.8 Revision 4 and extend a provision of the endorsed standard for crediting experience towards a baccalaureate.

By email dated May 22, 2025 [ADAMS Accession No. ML25142A347], NRC staff notified SNC that additional information is needed for the staff to perform their review.

The Enclosure to this letter provides the SNC response to the NRC staff's request for additional information (RAI).

Attachments 1 and 2 to this letter provide revised markups of the affected QATR page and NDQAM page, respectively.

Attachments 3 and 4 to this letter provide the revised clean-typed affected QATR page and NDQAM page, respectively.

The additional information provided in the Enclosure to this letter does not impact the regulatory evaluation (including the No Significant Hazards Consideration Determination) or environmental considerations for the associated proposed changes to the Technical Specifications provided in Enclosure 2 of the January 23, 2025 submittal.

This letter contains no regulatory commitments. If you have any questions, please contact Ryan Joyce at 205.992.6468.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 18<sup>th</sup> day of June 2025.

Respectfully submitted,



Ryan M. Joyce  
Licensing Manager  
Southern Nuclear Operating Company

RMJ/agq/cbg

Enclosure:    Response to Request for Additional Information

- Attachments:
1. Revised Markup of the Quality Assurance Topical Report Page that Previously Included the Exception to Regulatory Guide 1.8
  2. Revised Markup of the Nuclear Development Quality Assurance Manual Page that Previously Included the Exception to Regulatory Guide 1.8
  3. Revised Clean-typed Quality Assurance Topical Report Page that Previously Included the Exception to Regulatory Guide 1.8
  4. Revised Clean-typed Nuclear Development Quality Assurance Manual Page that Previously Included the Exception to Regulatory Guide 1.8

cc:    Regional Administrator, Region II  
      NRR Project Manager – Hatch 1&2, Farley 1&2, Vogtle 1&2, and Vogtle 3&4  
      Senior Resident Inspector – Hatch 1&2, Farley 1&2, Vogtle 1&2, and Vogtle 3&4  
      Director, Alabama Office of Radiation Control  
      State of Georgia Environmental Protection Division  
      R-Type: CGA02.001

**Enclosure to NL-25-0235**

**Edwin I. Hatch Nuclear Plant Units 1&2  
Joseph M. Farley Nuclear Plant Units 1&2  
Vogtle Electric Generating Plant Units 1&2  
Vogtle Electric Generating Plant Units 3&4**

**Response to Request for Additional Information Regarding  
Change to Quality Assurance Program to Adopt Regulatory Guide 1.8 Revision 4**

**Response to Request for Additional Information**

### **REQUEST FOR ADDITIONAL INFORMATION (RAI)**

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 Plant (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?

### **SNC Response to Request for Additional Information**

With this response to request for additional information, SNC removes the proposed change 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 semester credit hours. Accordingly, all discussion of this proposed exception to Regulatory Guide 1.8 Revision 4 (Reference 1), as well as discussions regarding Sections 4.1.1.1 and 4.1.1.2 of ANSI/ANS-3.1-2014 (Reference 2), included in Enclosures 1 and 2 to SNC letter dated January 23, 2025 (Reference 3) should be disregarded.

Revised markups of the affected Quality Assurance Topical Report (QATR) page and Nuclear Development Quality Assurance Manual (NDQAM) page that previously included the exception are provided in Attachments 1 and 2. These markup pages replace the corresponding markup pages that were provided in Attachments 1 and 2 to Enclosure 1 of Reference 3.

Revised clean-typed QATR and NDQAM pages that previously included the exception are provided in Attachments 3 and 4. These clean-typed pages replace the corresponding clean-typed pages that were provided in Attachments 3 and 4 to Enclosure 1 of Reference 3.

Note that the footer of the NDQAM in the attached markup page indicates Version 25.2 whereas the footer of the same markup page provided in Reference 3 indicates Version 25.1. As explained in SNC's letter dated March 24, 2025 (Reference 4), Version 25.2 only incorporated a change in footer formatting and did not affect any of the substance of the NDQAM. Thus,



although the footers indicate different versions, there are no differences in the content of the affected page other than the changes to markups described in this response to request for additional information.

### **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?

### **SNC Response to Request for Confirmatory Information**

SNC has not discussed with ANSI/ANS the deviation from ANSI/ANS-3.1-2014 previously proposed in Reference 3. SNC has not discussed with ANSI/ANS their rationale for the as-written provisions of Sections 4.1.1.1, "Alternatives to degree requirements," and 4.1.1.2, "Experience substitution for education," of ANSI/ANS-3.1-2014.

### **References**

1. Regulatory Guide 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," Revision 4, U.S. Nuclear Regulatory Commission, June 2019 [ADAMS Accession No. ML19101A395].
2. ANSI/ANS-3.1-2014, "Selection, Qualification, and Training of Personnel for Nuclear Power Plants," American Nuclear Society, November 2014, La Grange Park, IL.
3. SNC letter NL-24-0117 to NRC, "Change to Quality Assurance Program to Adopt Regulatory Guide 1.8 Revision 4 and License Amendment Request to Relocate Control of the Unit/Facility/Plant Staff Qualification Requirements from the Technical Specifications to the Quality Assurance Program," dated January 23, 2025 [ADAMS Accession No. ML25023A218].
4. SNC letter NL-25-0046 to NRC, "Submittal of Quality Assurance Topical Report and Nuclear Development Quality Assurance Manual," dated March 24, 2025 [ADAMS Accession No. ML25083A242].

**Enclosure 1 to NL-25-0235, Attachment 1**

**Edwin I. Hatch Nuclear Plant Units 1&2  
Joseph M. Farley Nuclear Plant Units 1&2  
Vogtle Electric Generating Plant Units 1&2  
Vogtle Electric Generating Plant Units 3&4**

**Response to Request for Additional Information Regarding  
Change to Quality Assurance Program to Adopt Regulatory Guide 1.8 Revision 4**

**Revised Markup of the Quality Assurance Topical Report Page that Previously Included  
the Exception to Regulatory Guide 1.8**

**Markup Legend:**

- Text that was previously proposed to be deleted and still proposed to be deleted are indicated in red strikethrough (~~example~~).
- Text previously proposed to be added and still proposed to be added is indicated in blue underline (example).
- Text previously proposed to be added but are no longer proposed to be added are indicated in blue underline and double strikethrough (~~example~~).
- Text not previously proposed to be added but is now proposed to be added is indicated by blue double underline (example). Note this type of change is limited to a punctuation change that was necessary following the material changes to the markups.

SOUTHERN NUCLEAR OPERATING COMPANY, INC.  
QUALITY ASSURANCE TOPICAL REPORT

## PART III REGULATORY COMMITMENTS

### NRC Regulatory Guides and Quality Assurance Standards.

This section identifies the NRC Regulatory Guides and the other quality assurance standards which have been selected to supplement and support the SNC QA Program. Southern Nuclear commits to compliance with these standards to the extent described herein. Commitment to a particular Regulatory Guide or other QA standard does not constitute a commitment to the Regulatory Guides or QA standards that may be referenced therein.

- Regulatory Guide 1.8 [Revision 4](#) – Qualification and Training of Personnel for Nuclear Power Plants
  - Southern Nuclear meets the requirement of ~~the applicable Technical Specifications~~ [Regulatory Guide 1.8 Revision 4](#) for each plant for the selection and training of nuclear power plant personnel, ~~with the following exceptions:~~
    - ~~For the following positions, the ANSI/ANS 3.1-2014 Section 4.1.1.2, “Experience substitution for education” is expanded to allow related experience to be substituted at a rate of 8 semester credit hours for each year of related experience up to a maximum of 80 credit hours:~~
      - ~~Plant Manager~~
      - ~~Operations Director (Operations Senior Manager)~~
      - ~~Maintenance Director (Maintenance Senior Manager)~~
      - ~~Training Director (Training Senior Manager)~~
      - ~~Chemistry Manager~~
      - ~~Radiation Protection Manager~~
  - [Individuals filling positions who met the previous commitment at the time of implementation of this commitment can be considered to meet any more restrictive aspects of the requirements of this commitment for that position without further review and documentation.](#)
  - The SNC nuclear plant qualification and training program is described in Sections 13.1 and 13.2 of the FSARs.
- Regulatory Guide 1.28, Revision 3, August, 1985 – Quality Assurance Program Requirements (Design and Construction)

Southern Nuclear meets the requirements of this regulatory guide for Construction Activities conducted by Southern Nuclear, except that ASME NQA-1-1994 edition (as modified by the exceptions to NQA-1-1994 as shown in this QATR) will be used in place of ANSI/ASME NQA-1-1983 and the ANSI/ASME NQA-1a-1983 Addenda.



**Enclosure 1 to NL-25-0235, Attachment 2**

**Edwin I. Hatch Nuclear Plant Units 1&2  
Joseph M. Farley Nuclear Plant Units 1&2  
Vogtle Electric Generating Plant Units 1&2  
Vogtle Electric Generating Plant Units 3&4**

**Response to Request for Additional Information Regarding  
Change to Quality Assurance Program to Adopt Regulatory Guide 1.8 Revision 4**

**Revised Markup of the Nuclear Development Quality Assurance Manual Page that  
Previously Included the Exception to Regulatory Guide 1.8**

**Markup Legend:**

- Text that was previously proposed to be deleted and still proposed to be deleted are indicated in red strikethrough (~~example~~).
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- Text not previously proposed to be added but is now proposed to be added is indicated by blue double underline (example). Note this type of change is limited to a punctuation change that was necessary following the material changes to the markups.

## PART IV REGULATORY COMMITMENTS

### NRC REGULATORY GUIDES AND QUALITY ASSURANCE STANDARDS

This section identifies the NRC Regulatory Guides and the other quality assurance standards which have been selected to supplement and support the SNC NDQAM. SNC complies with these standards to the extent described or referenced. Commitment to a particular Regulatory Guide or standard does not constitute a commitment to Regulatory Guides or standards that may be referenced therein.

#### 1.0 Regulatory Guides

##### 1.1 Regulatory Guide 1.8, Rev. ~~43~~, ~~June 2019~~May 2000, Qualification and Training of Personnel for Nuclear Power Plants

1.1.1 Regulatory Guide 1.8 provides guidance that is acceptable to the NRC staff regarding qualifications and training for nuclear power plant personnel.

1.1.2 SNC ~~identifies~~ conforms ~~ance~~ with this regulatory guide, except for the following positions, the ANSI/ANS-3.1-2014 Section 4.1.1.2, "Experience substitution for education" is expanded to allow related experience to be substituted at a rate of 8 semester credit hours for each year of related experience up to a maximum of 80 credit hours; and exceptions for the applicable regulatory position guidance provided in this regulatory guide in FSAR Chapter 1, Appendix 1A.

- ~~Plant Manager~~
- ~~Operations Director (Operations Senior Manager)~~
- ~~Maintenance Director (Maintenance Senior Manager)~~
- ~~Training Director (Training Senior Manager)~~
- ~~Chemistry Manager~~
- Radiation Protection Manager

1.1.3 Individuals filling positions who met the previous commitment at the time of implementation of this commitment can be considered to meet any more restrictive aspects of the requirements of this commitment for that position without further review and documentation.

##### 1.2 Regulatory Guide 1.26, Revision 4, March 2007 – Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants

1.2.1 Regulatory Guide 1.26 defines classification of systems and components.

1.2.2 SNC identifies conformance and exceptions for the applicable regulatory position guidance provided in this regulatory guide in FSAR Chapter 1, Appendix 1A.

**Enclosure 1 to NL-25-0235, Attachment 3**

**Edwin I. Hatch Nuclear Plant Units 1&2  
Joseph M. Farley Nuclear Plant Units 1&2  
Vogtle Electric Generating Plant Units 1&2  
Vogtle Electric Generating Plant Units 3&4**

**Response to Request for Additional Information Regarding  
Change to Quality Assurance Program to Adopt Regulatory Guide 1.8 Revision 4**

**Revised Clean-typed Quality Assurance Topical Report Page that Previously Included the  
Exception to Regulatory Guide 1.8**

**SOUTHERN NUCLEAR OPERATING COMPANY, INC.**  
**QUALITY ASSURANCE TOPICAL REPORT**

## **PART III REGULATORY COMMITMENTS**

### **NRC Regulatory Guides and Quality Assurance Standards.**

This section identifies the NRC Regulatory Guides and the other quality assurance standards which have been selected to supplement and support the SNC QA Program. Southern Nuclear commits to compliance with these standards to the extent described herein. Commitment to a particular Regulatory Guide or other QA standard does not constitute a commitment to the Regulatory Guides or QA standards that may be referenced therein.

- Regulatory Guide 1.8 Revision 4 – Qualification and Training of Personnel for Nuclear Power Plants
  - Southern Nuclear meets the requirement of Regulatory Guide 1.8 Revision 4 for each plant for the selection and training of nuclear power plant personnel.
  - Individuals filling positions who met the previous commitment at the time of implementation of this commitment can be considered to meet any more restrictive aspects of the requirements of this commitment for that position without further review and documentation.
  - The SNC nuclear plant qualification and training program is described in Sections 13.1 and 13.2 of the FSARs.
- Regulatory Guide 1.28, Revision 3, August, 1985 – Quality Assurance Program Requirements (Design and Construction)
  - Southern Nuclear meets the requirements of this regulatory guide for Construction Activities conducted by Southern Nuclear, except that ASME NQA-1-1994 edition (as modified by the exceptions to NQA-1-1994 as shown in this QATR) will be used in place of ANSI/ASME NQA-1-1983 and the ANSI/ASME NQA-1a-1983 Addenda. Within Regulatory Guide 1.28, the terms “direct evaluation” and “audit” may be satisfied using remote assessment techniques in pandemic or exigent conditions.
- Regulatory Guide 1.33, Revision 2, February 1978 – Quality Assurance Program Requirements (Operation)
  - Southern Nuclear considers that the collective quality assurance requirements of this QATR and the QA requirements of ASME NQA-1-1994 are equivalent to ANSI N18.7-1976/ANS-3.2 and Regulatory Guide 1.33, Revision 2. Consequently,

**Enclosure 1 to NL-25-0235, Attachment 4**

**Edwin I. Hatch Nuclear Plant Units 1&2  
Joseph M. Farley Nuclear Plant Units 1&2  
Vogtle Electric Generating Plant Units 1&2  
Vogtle Electric Generating Plant Units 3&4**

**Response to Request for Additional Information Regarding  
Change to Quality Assurance Program to Adopt Regulatory Guide 1.8 Revision 4**

**Revised Clean-typed Nuclear Development Quality Assurance Manual Page that  
Previously Included the Exception to Regulatory Guide 1.8**



## PART IV REGULATORY COMMITMENTS

### NRC REGULATORY GUIDES AND QUALITY ASSURANCE STANDARDS

This section identifies the NRC Regulatory Guides and the other quality assurance standards which have been selected to supplement and support the SNC NDQAM. SNC complies with these standards to the extent described or referenced. Commitment to a particular Regulatory Guide or standard does not constitute a commitment to Regulatory Guides or standards that may be referenced therein.

#### 2.0 Regulatory Guides

- 1.1 **Regulatory Guide 1.8**, Rev. 4, June 2019, Qualification and Training of Personnel for Nuclear Power Plants
  - 1.1.1 Regulatory Guide 1.8 provides guidance that is acceptable to the NRC staff regarding qualifications and training for nuclear power plant personnel.
  - 1.1.2 SNC conforms with this regulatory guide.
  - 1.1.3 Individuals filling positions who met the previous commitment at the time of implementation of this commitment can be considered to meet any more restrictive aspects of the requirements of this commitment for that position without further review and documentation.
- 1.2 **Regulatory Guide 1.26**, Revision 4, March 2007 – Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants
  - 1.2.1 Regulatory Guide 1.26 defines classification of systems and components.
  - 1.2.2 SNC identifies conformance and exceptions for the applicable regulatory position guidance provided in this regulatory guide in FSAR Chapter 1, Appendix 1A.