

Public Meeting regarding the SNC Fleet License Amendment Request for Changes to Emergency Action Level Schemes to Adopt NEI 99-01 Rev. 7 (L-2025-LLA-0157)

January 7, 2026



NRC Bullet 1

NRC Request

The LAR does not conspicuously identify variances from NEI 99-01, Revision 7 or provide sufficient technical justification for each difference/deviation. In particular, the proposed license amendment does not provide:

- a complete and accurate mapping to the EAL revision 7 scheme
- justifications for the changes to the as built/as modified plant, changes to instruments and values
- substantial additions or deletions of text in the EAL bases.

SNC Proposed Action

- SNC will provide an EAL Comparison Matrix which identifies differences and deviations (per RIS 2003-18) in a line-by-line comparison to the Rev 7 wording with basis for each.
- Justifications for changes made to the Rev 6 EALs since NRC approval are documented in 50.54(q) evaluations and described in the version summaries of each site EAL procedure. SNC can provide the current EAL procedures for each plant during an Audit or, if required, can submit the current EALs on the docket.
- SNC will provide an explanation of substantial additions or deletions of text in the EAL bases in the EAL Comparison Matrix.

NRC Bullet 2

NRC Request

The LAR appears to lack sufficient documentation to confirm that all the applicable calculations supporting adoption of NEI 99-01, Revision 7, are the same as those approved for Revision 6, or to provide the applicable revised calculations.

SNC Proposed Action

- SNC can provide the modified Rev 7 calculations for each plant during an Audit or, if required, can submit the calculations on the docket.

NRC Bullet 3

NRC Request

The LAR provides a mark-up of proposed changes but does not include a clean and complete proposed version of the EAL schemes including the front matter for each of the sites.

SNC Proposed Action

- SNC will provide clean and complete proposed versions of the EAL schemes including the front matter for each of the sites.

Proposed EAL Comparison Matrix

EAL	R7 EAL wording	SNC wording	Basis
RG1 Notes	The Shift Manager/Emergency Director should declare the Alert promptly upon determining that the applicable time has been exceeded or will likely be exceeded.	The Shift Manager/Emergency Director should declare the Alert General Emergency promptly upon determining that the applicable time has been exceeded or will likely be exceeded.	September 2024 Final Change Summary and Development of Emergency Action Levels for Non-Passive Reactors incorrectly listed Alert in the notes section for General Emergency.

Site Specific Inputs

Calculation based values

	FNP Calculation Sheet 3	SNC R7																
RG1	<p>Initiating Condition RG1</p> <p>Greater than any of the following monitor readings for 15 minutes or longer serves as the threshold for EAL 1.</p> <table><tr><th>Radiation Monitor</th><th>Vent Path</th><th colspan="2">Monitor Reading</th></tr><tr><td>RE0015B</td><td>SJAE</td><td>90 $\mu\text{Ci/cc}$</td><td>2.7 R/hr</td></tr><tr><td>RE0029B</td><td>Plant Vent Stack</td><td colspan="2">0.6 $\mu\text{Ci/cc}$</td></tr></table>	Radiation Monitor	Vent Path	Monitor Reading		RE0015B	SJAE	90 $\mu\text{Ci/cc}$	2.7 R/hr	RE0029B	Plant Vent Stack	0.6 $\mu\text{Ci/cc}$		<p>(1) Readings on ANY of the following radiation monitors greater than the reading shown below for 15 minutes or longer:</p> <table><tr><td>RE-15B - Steam Jet Air Ejector</td><td>90 $\mu\text{Ci/cc}$ (2.7 R/hr)</td></tr><tr><td>RE-29B - Plant Vent Stack</td><td>0.6 $\mu\text{Ci/cc}$</td></tr></table>	RE-15B - Steam Jet Air Ejector	90 $\mu\text{Ci/cc}$ (2.7 R/hr)	RE-29B - Plant Vent Stack	0.6 $\mu\text{Ci/cc}$
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Site Specific Inputs

Plant Specific Criteria (e.g., rooms, plant equipment, etc)

	R7 states "UNPLANNED increase in (site-specific sump and/or tank) levels due to a loss of (reactor vessel/RCS [PWR] or RPV [BWR]) inventory."	SNC R7 Submittal
CA1	Plant design provides indications of water values via Containment <u>Sump</u> , Reactor Coolant Drain Tank (RCDT) OR Waste Holdup Tank (WHT) level changes. This is an example where plant design provides the input to an EAL. Additionally, example of changing increase to rise for Human Performance purposes.	<p>Reactor vessel/RCS level cannot be monitored for 30 minutes or longer.</p> <p>AND</p> <p>b. EITHER of the following:</p> <ol style="list-style-type: none"> 1. UNPLANNED increase rise in Containment sump, Reactor Coolant Drain Tank (RCDT) OR Waste Holdup Tank (WHT) levels due to a loss of reactor vessel/RCS inventory.



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