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June 3, 2014

Mr. C. R. Pierce  
Regulatory Affairs Director  
Southern Nuclear Operating Company, Inc.  
Post Office Box 1295, Bin- 038  
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SUBJECT: EDWIN I. HATCH, UNIT 2 - STAFF ASSESSMENT OF THE SEISMIC WALKDOWN REPORT SUPPORTING IMPLEMENTATION OF NEAR-TERM TASK FORCE RECOMMENDATION 2.3 RELATED TO THE FUKUSHIMA DAI-ICHI NUCLEAR POWER PLANT ACCIDENT (TAC NO. MF0131)

Dear Mr. Pierce:

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued a request for information letter per Title 10 of the *Code of Federal Regulations*, Subpart 50.54(f) (50.54(f) letter). The 50.54(f) letter was issued to power reactor licensees and holders of construction permits requesting addressees to provide further information to support the NRC staff's evaluation of regulatory actions to be taken in response to lessons learned from Japan's March 11, 2011, Great Tōhoku Earthquake and subsequent tsunami. The request addressed the methods and procedures for nuclear power plant licensees to conduct seismic and flooding hazard walkdowns to identify and address degraded, nonconforming, or unanalyzed conditions through the corrective action program, and to verify the adequacy of the monitoring and maintenance procedures.

By letter dated November 27, 2012, Southern Nuclear Operating Company (SNC) submitted its Seismic Walkdown Report as requested in Enclosure 3 of the 50.54(f) letter for the Edwin I. Hatch Power Station, Unit 2. By letter dated November 25, 2013, SNC provided a response to the NRC request for additional information for the NRC staff to complete its assessments. By letter dated April 9, 2014, SNC provided Version 2 of the Hatch, Unit 2, walkdown report documenting the results of additional seismic walkdowns performed for items that were inaccessible during the initial walkdowns.

C. R. Pierce

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The NRC staff reviewed the information provided and, as documented in the enclosed staff assessment, determined that sufficient information was provided to be responsive to Enclosure 3 of the 50.54(f) letter.

Sincerely,



Robert Martin, Senior Project Manager  
Plant Licensing Branch II-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-366

Enclosure:  
Staff Assessment of Seismic Walkdown Report

cc w/encl: Distribution via Listserv

STAFF ASSESSMENT OF SEISMIC WALKDOWN REPORT  
NEAR-TERM TASK FORCE RECOMMENDATION 2.3 RELATED TO  
THE FUKUSHIMA DAI-ICHI NUCLEAR POWER PLANT ACCIDENT  
SOUTHERN NUCLEAR OPERATING COMPANY  
EDWIN I. HATCH POWER STATION, UNIT 2  
DOCKET NO. 50-366

1.0 INTRODUCTION

On March 12, 2012,<sup>1</sup> the U.S. Nuclear Regulatory Commission (NRC) issued a request for information per Title 10 of the *Code of Federal Regulations*, Subpart 50.54(f) (50.54(f) letter) to all power reactor licensees and holders of construction permits in active or deferred status. The request was part of the implementation of lessons learned from the accident at the Fukushima Dai-ichi nuclear power plant. Enclosure 3, "Recommendation 2.3: Seismic,"<sup>2</sup> to the 50.54(f) letter requested licensees to conduct seismic walkdowns to identify and address degraded, nonconforming, or unanalyzed conditions using the corrective action program (CAP), verify the adequacy of monitoring and maintenance procedures, and report the results to the NRC.

Enclosure 3 of the 50.54(f) letter requested licensees to provide the following:

- a. Information concerning the plant-specific hazard licensing bases and a description of the protection and mitigation features considered in the licensing basis evaluation.
- b. Information related to the implementation of the walkdown process.
- c. A list of plant-specific vulnerabilities identified by the Individual Plant Examination of External Events (IPEEE) program and a description of the actions taken to eliminate or reduce them.
- d. Results of the walkdown including key findings and identified degraded, nonconforming, or unanalyzed conditions.
- e. Any planned or newly installed protection and mitigation features.
- f. Results and any subsequent actions taken in response to the peer review.

In accordance with the 50.54(f) letter, Enclosure 3, Required Response Item 2, licensees were required to submit a response within 180 days of the NRC's endorsement of the seismic walkdown process. By letter dated May 29, 2012,<sup>3</sup> the Nuclear Energy Institute (NEI) staff

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<sup>1</sup> Agencywide Documents Access and Management System (ADAMS) Accession No. ML12053A340

<sup>2</sup> ADAMS Accession No. ML12056A049

<sup>3</sup> ADAMS Package Accession No. ML121640872

submitted Electric Power Research Institute (EPRI) document 1025286, "Seismic Walkdown Guidance for Resolution of Fukushima Near-Term Task Force Recommendation 2.3: Seismic," (walkdown guidance) to the NRC staff to consider for endorsement. By letter dated May 31, 2012,<sup>4</sup> the NRC staff endorsed the walkdown guidance.

By letter dated November 27, 2012,<sup>5</sup> Southern Nuclear Operating Company (the licensee) provided a response to Enclosure 3 of the 50.54(f) letter Required Response Item 2, for Edwin I. Hatch Power Station, Unit 2 (HNP-2). The NRC staff reviewed the walkdown report and determined that additional supplemental information would assist the NRC staff in completing its review. In a letter dated November 1, 2013,<sup>6</sup> the NRC staff requested additional information to gain a better understanding of the processes and procedures used by the licensee in conducting the walkdowns and walk-bys. The licensee responded to the NRC staff request by letter dated November 25, 2013.<sup>7</sup> By letter dated April 9, 2014,<sup>8</sup> the licensee submitted Version 2 of the walkdown report. The purpose of the updated version was to provide the results of the completed walkdowns of inaccessible items and internal inspection of cabinets that were not opened and inspected during the initial walkdowns.

The NRC staff evaluated the licensee's submittals to determine if the information provided in the walkdown report met the intent of the walkdown guidance and if the licensee responded appropriately to Enclosure 3 of the 50.54(f) letter.

## 2.0 REGULATORY EVALUATION

The structures, systems, and components (SSCs) important to safety in operating nuclear power plants are designed either in accordance with, or meet the intent of Appendix A to 10 CFR Part 50, General Design Criteria (GDC) 2: "Design Bases for Protection Against Natural Phenomena;" and Appendix A to 10 CFR Part 100, "Reactor Site Criteria." GDC 2 states that SSCs important to safety at nuclear power plants shall be designed to withstand the effects of natural phenomena such as earthquakes, tornadoes, hurricanes, floods, tsunami, and seiches without loss of capability to perform their safety functions.

For initial licensing, each licensee was required to develop and maintain design bases that, as defined by 10 CFR 50.2, identify the specific functions that an SSC of a facility must perform, and the specific values or ranges of values chosen for controlling parameters as reference bounds for the design.

The design bases for the SSCs reflect appropriate consideration of the most severe natural phenomena that have been historically reported for the site and surrounding area. The design bases also reflect sufficient margin to account for the limited accuracy, quantity, and period of time in which the historical data have been accumulated.

The current licensing basis is the set of NRC requirements applicable to a specific plant, including the licensee's docketed commitments for ensuring compliance with, and operation

<sup>4</sup> ADAMS Accession No. ML12145A529

<sup>5</sup> ADAMS Accession No. ML123550839

<sup>6</sup> ADAMS Accession No. ML13304B418

<sup>7</sup> ADAMS Accession No. ML13330A556

<sup>8</sup> ADAMS.Package Accession No. ML14101A073.

within, applicable NRC requirements and the plant-specific design basis, including all modifications and additions to such commitments over the life of the facility operating license.

### 3.0 TECHNICAL EVALUATION

#### 3.1 Seismic Licensing Basis Information

The licensee provided information on the plant-specific licensing basis for the Seismic Category I SSCs for HNP-2 in Section 3 of the walkdown report. Consistent with the walkdown guidance, the NRC staff noted that the report includes a summary of the Safe Shutdown Earthquake (SSE) and a description of the codes, standards, and methods that were used in the design of the Seismic Category I SSCs for meeting the plant-specific seismic licensing basis requirements. The NRC staff reviewed Section 3 of the walkdown report, focusing on the summary of the SSE and the design codes used in the design.

Based on its review, the NRC staff concludes that the licensee has provided information on the plant-specific seismic licensing basis and a description of the protection and mitigation features considered in the licensing bases evaluation consistent with Section 8, Submittal Report, of the walkdown guidance.

#### 3.2 Seismic Walkdown Methodology Implementation

Section 2, Personnel Qualifications; Section 3, Selection of SSCs; Section 4, Seismic Walkdowns and Area Walk-Bys; and Section 5, Seismic Licensing Basis Evaluations, of the walkdown guidance provide information to licensees regarding the implementation of an appropriate seismic walkdown methodology. By letter dated July 18, 2012,<sup>9</sup> the licensee confirmed that it would utilize the walkdown guidance in the performance of the seismic walkdowns at Hatch 2.

The walkdown report dated November 27, 2012, did not identify deviations from the walkdown guidance.

The NRC staff reviewed the following sections of the walkdown methodology implementation provided in the walkdown report:

- Personnel Qualifications
- Development of the Seismic Walkdown Equipment Lists (SWELs)
- Implementation of the Walkdown Process
- Licensing Basis Evaluations and Results

##### 3.2.1 Personnel Qualifications

Section 2, Personnel Qualifications, of the walkdown guidance provides licensees with qualification information for personnel involved in the conduct of the seismic walkdowns and area walk-bys.

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<sup>9</sup> ADAMS Accession No. ML12192A517

The NRC staff reviewed the information provided in Section 4 of the walkdown report, which includes information on the walkdown personnel and their qualifications. Specifically, the NRC staff reviewed the summary of the background, experience, and level of involvement for the following personnel involved in the seismic walkdown activities: equipment selection personnel, seismic walkdown engineers (SWEs), licensing basis reviewers, IPEEE reviewers, peer review team, and operations staff.

Based on the review of the licensee's submittals, the NRC staff concludes that those involved in the seismic walkdown activities have the appropriate seismic background, knowledge and experience, as specified in Section 2 of the walkdown guidance.

### 3.2.2 Development of the SWELs

Section 3, Selection of SSCs, of the walkdown guidance provides information to licensees for selecting the SSCs that should be placed on the SWELs, so that they can be walked down by qualified personnel.

The NRC staff reviewed the overall process used by the licensee to develop the Hatch 2 base list, SWEL 1 (sample list of designated safety functions equipment), and SWEL 2 (sample list of spent fuel pool related equipment). The overall equipment selection process followed the screening process shown in Figures 1-1 and 1-2 of the walkdown guidance. Based on Attachment 1 of the walkdown report, Hatch 2 SWELs 1 and 2 meet the inclusion requirements of the walkdown guidance. Specifically, the following attributes were considered in the sample selection:

- A variety of systems, equipment and environments
- IPEEE equipment
- Major new or replacement equipment
- Risk considerations

Due to individual plant configurations and the walkdown guidance screening process followed to select the final SWEL equipment, it is possible that some classes of equipment will not be represented on the SWEL. The walkdown guidance recognizes this is due to the equipment not being present in the plant (e.g., some plants generate DC power using inverters and therefore do not have motor generators) or the equipment being screened out during the screening process (the screening process is described in Section 3 of the walkdown guidance).

In the updated walkdown report, the licensee stated that it substituted one item on the SWEL in order to bring the walkdowns to a timely completion. This item was replaced with a similar component from the same equipment class that was accessible during the subsequent walkdowns. The staff also notes that the licensee removed two pieces of equipment from the SWEL but similar components in the same equipment class remained on the SWEL and were walked down. The staff reviewed the substituted and deleted items described in Sections 5.0 and 9.2.2 of the updated walkdown report and noted that the alternate component is acceptable because it represents the same equipment class and function. In addition, the NRC staff concludes that the changes to the SWEL maintained the diversity of the equipment classes represented in the original SWEL.

After reviewing SWELs 1 and 2, the NRC staff concludes that the sample of SSCs represents a diversity of component types and assures inclusion of components from critical systems and functions, thereby meeting the intent of the walkdown guidance. In addition, the NRC staff notes that the equipment selection personnel were appropriately supported by plant operations staff as described in the walkdown guidance.

### 3.2.3 Implementation of the Walkdown Process

Section 4, Seismic Walkdowns and Area Walk-Bys, of the walkdown guidance provides information to licensees regarding the conduct of the seismic walkdowns and area walk-bys for each site.

The NRC staff reviewed Sections 7 and 8 of the walkdown report, which summarize the implementation and results of the seismic walkdowns and area walk-bys, respectively, including an overview of the number of items walked down and the number of areas walked-by. The walkdown report states that teams which consisted of at least two qualified SWEs conducted the seismic walkdowns and area walk-bys. According to the signed seismic walkdown checklists (SWCs) and area walk-by checklists (AWCs), these activities were conducted from September 6, 2012 to September 27, 2012. In addition, a subsequent set of walkdowns were performed, as stated in the April 9, 2014 letter from the licensee. The purpose of the last activity was to complete a number of items that were inaccessible during the initial walkdowns. The walkdown report also states that the SWEs discussed their observations and judgments with each other during the walkdowns. Additionally, the SWEs agreed on the results of their seismic walkdowns and area walk-bys before reporting the results of their review. Attachments 3 and 4 of the walkdown report provide the completed SWCs and AWCs, documenting the results from the initial walkdowns for each item of equipment on SWEL 1 and 2 and each area containing SWEL equipment. Attachments 7 and 8 of the updated walkdown report contain the SWCs and AWCs for the subsequent walkdowns. The licensee used the checklists provided in Appendix C of the walkdown guidance report without modification.

The licensee documented cases of potentially adverse seismic conditions (PASCs) in the checklists for further evaluation. Table 8-1 of the updated walkdown report lists the PASCs identified during the seismic walkdowns and the area walk-bys. The table describes how each condition was addressed (e.g., placement in the CAP), its resolution and its current status. Based on the initial review of the checklists, the NRC staff was unable to confirm that all the PASCs identified during the walkdowns were included in this table.

By letter dated November 1, 2013, the NRC staff issued two questions in a request for additional information (RAI) in order to obtain additional clarification regarding the process followed by the licensee when evaluating conditions identified in the field during the walkdowns and walk-bys. Specifically, in RAI 1 the NRC staff requested the licensee to provide further explanation regarding how a field observation was determined to be PASC, and to ensure that the basis for determination was addressed using normal plant processes and documented in the walkdown report. In response to RAI 1, the licensee stated that in cases where the SWEs identified a potentially adverse condition, the SWEs performed a preliminary licensing basis evaluation to determine if the condition was acceptable or should be entered into the CAP. The conclusions from these preliminary evaluations were documented on the checklists and a basis provided if the condition was determined to be acceptable. The licensee referred to Table 8-1 of

the walkdown report which includes all the PASCs identified during the walkdowns and area walk-bys for HNP-2. Also, in response to RAI 1, the licensee stated that all potentially adverse conditions were conservatively entered into the site CAP per SNC expectations in a timely fashion.

After evaluating the licensee's response and reviewing Table 8-1, the NRC staff concludes that the licensee responded appropriately to RAI 1. In addition, the NRC staff concludes that PASCs were properly identified and documented and the summary table provided is considered complete.

In addition to the information provided above, the NRC staff notes that anchorage configurations were verified to be consistent with existing plant documentation for at least 50 percent of the SWEL items, in accordance with Section 4 of the walkdown guidance.

Section 2.0 of the walkdown report confirms that accessible cabinets were opened to perform internal inspections and to confirm the absence of any other adverse seismic conditions. Based on a detailed review of the SWCs and AWCs, the NRC staff confirmed that the licensee opened and inspected cabinet internals during the initial and subsequent walkdowns.

Based on the information provided in the licensee's submittals, the NRC staff concludes that the licensee's implementation of the walkdown process meets the intent of the walkdown guidance.

#### 3.2.4 Licensing Basis Evaluations and Results

Section 5, Seismic Licensing Basis Evaluations, of the walkdown guidance provides information to licensees regarding the conduct of licensing basis evaluations for items identified during the seismic walkdowns as degraded, nonconforming, or unanalyzed that might have potential seismic significance.

The NRC staff reviewed Section 8 of the HNP-2 Walkdown Report, which discusses the process for conducting the seismic licensing basis evaluations of the PASCs identified during the seismic walkdowns and area walk-bys. The licensee stated that it performed its licensing basis evaluations and resolved PASCs using the CAP. Table 8-1 of the updated walkdown report lists the key licensee findings, and provides a complete list of the potentially degraded, nonconforming, or unanalyzed conditions identified during the initial and subsequent walkdowns and walk-bys. This table also describes the actions taken or planned to address these conditions, including the current status of each of the items the licensee entered into the CAP. The licensee noted that the PASCs listed in Table 8-1 do not indicate that the SSCs are deficient or not in conformance with the licensing basis, merely that the threshold for inclusion in the CAP was conservatively low.

The NRC staff reviewed the CAP entries and the description of the actions taken or planned to address deficiencies. The NRC staff concludes that the licensee appropriately identified potentially degraded, nonconforming, or unanalyzed conditions and entered them into the CAP, which meets the intent of the walkdown guidance.

### 3.2.5 Conclusion

Based on the discussion above, the NRC staff concludes that the licensee's implementation of seismic walkdown methodology meets the intent of the walkdown guidance for personnel qualifications, development of SWELs, implementation of the walkdown process, and seismic licensing basis evaluations.

### 3.3 Peer Review

Section 6, Peer Review, of the walkdown guidance provides licensees with information regarding the conduct of peer reviews for the activities performed during the seismic walkdowns. Page 6-1 of the walkdown guidance identifies the following activities to be conducted during the peer review process:

- Review the selection of the SSCs included on the SWELs
- Review a sample of the checklists prepared for the seismic walkdowns and area walk-bys
- Review the licensing basis evaluations
- Review the decisions for entering the potentially adverse conditions into the CAP
- Review the walkdown report
- Summarize the results of the peer review process in the walkdown report

The NRC staff reviewed the information provided in Section 9 of the HNP- 2 Walkdown Report which describes the conduct of the peer review for the initial and subsequent walkdowns. In addition, the NRC staff reviewed the response to RAI 2. In RAI 2, the NRC staff requested the licensee to provide additional information on the overall peer review process that was followed as part of the walkdown activities. Specifically, the NRC staff requested the licensee to confirm that the activities identified in page 6-1 of the walkdown guidance were assessed and documented in the report. The licensee was also requested to confirm that any individual involved in performing any given walkdown activity was not a peer reviewer for that same activity. In response to RAI 2, the licensee confirmed that all the activities identified on page 6-1 of the walkdown guidance were included as part of the peer review process and that no individual performing a specific walkdown activity was a Peer Review Team Member for that same activity.

The NRC staff reviewed the licensee's summary of each of these activities, which included the peer review team members' level of involvement, the peer review findings, and resolution of peer review comments. After reviewing the licensee's submittals, the NRC staff concludes that the licensee sufficiently documented the results of the peer review activities and how these reviews affected the work described in the walkdown report.

Based on the discussion above, the NRC staff concludes that the licensee's results of the peer review and subsequent actions taken in response to the peer review meets the intent of Section 6 of the walkdown guidance.

### 3.4 IPEEE Information

Section 7, IPEEE Vulnerabilities, of the walkdown guidance provides information to licensees regarding the reporting of the evaluations conducted and actions taken in response to seismic vulnerabilities identified during the IPEEE program. Through the IPEEE program and Generic Letter (GL) 88-20, "Individual Plant Examination of External Events for Severe Accident Vulnerabilities," licensees previously had performed a systematic examination to identify any plant-specific vulnerabilities to severe accidents.

The licensee explained that the IPEEE program used vulnerabilities to mean seismic anomalies, outliers, or other findings. Attachment 5 of the walkdown report provides a list of the vulnerabilities, including the action taken to eliminate or reduce the seismic vulnerability, resolution and modification status. The NRC staff verified the list of IPEEE identified vulnerabilities which also includes a description of the action taken to eliminate or reduce the seismic vulnerability.

Based on the NRC staff's review of Section 5 of the walkdown report, the NRC staff concludes that the licensee's identification of plant-specific vulnerabilities (including anomalies, outliers and other findings) identified by the IPEEE program, as well as actions taken to eliminate or reduce them, meets the intent of Section 7 of the walkdown guidance.

### 3.5 Planned Upgrades

The licensee did not identify any planned or newly installed protection and mitigation features in the walkdown report.

### 3.6 NRC Oversight

#### 3.6.1 Independent Verification by Resident Inspectors

On July 6, 2012,<sup>10</sup> the NRC issued Temporary Instruction (TI) 2515/188 "Inspection of Near-Term Task Force Recommendation 2.3 Seismic Walkdowns." In accordance with the TI, NRC inspectors independently verified that the Hatch licensee implemented the seismic walkdowns in accordance with the walkdown guidance. Additionally, the inspectors independently performed walkdowns of a sample of seismic protection features. The inspection report dated January 28, 2013,<sup>11</sup> documents the results of this inspection and states that no findings were identified.

## 4.0 CONCLUSION

The NRC staff concludes that the licensee's implementation of seismic walkdown methodology meets the intent of the walkdown guidance. The NRC staff concludes that the licensee, through the implementation of the walkdown guidance activities and, in accordance with plant processes and procedures, verified the plant configuration with the current seismic licensing basis; addressed degraded, nonconforming, or unanalyzed seismic conditions; and verified the

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<sup>10</sup> ADAMS Accession No. ML12156A052

<sup>11</sup> ADAMS Accession No. ML13028A342

adequacy of monitoring and maintenance programs for protective features. Furthermore, the NRC staff notes that no immediate safety concerns were identified. The NRC staff reviewed the information provided and determined that sufficient information was provided to be responsive to Enclosure 3 of the 50.54(f) letter.

C. R. Pierce

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The NRC staff reviewed the information provided and, as documented in the enclosed staff assessment, determined that sufficient information was provided to be responsive to Enclosure 3 of the 50.54(f) letter.

Sincerely,

**/RA/**

Robert Martin, Senior Project Manager  
Plant Licensing Branch II-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-366

Enclosure:  
Staff Assessment of Seismic Walkdown Report

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