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Regulatory Affairs Director

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December 13, 2013

Docket Nos.: 50-424
50-425

NL-13-2544

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

Vogtle Electric Generating Plant, Units 1 and 2
Response to Request for Additional Information Regarding
Closure of Option 2 to Address In-Vessel Mitigative Measures
For Potential In-Vessel Blockage

Ladies and Gentlemen:

The Nuclear Regulatory Commission (NRC) Staff Requirements Memoranda dated December 14, 2012, "Closure Options for Generic Safety Issue (GSI)-191, Assessment of Debris Accumulation On Pressurized-Water Reactor Sump Performance," describes three closure options that licensees can follow to resolve GSI-191. By letter dated May 16, 2013 (ADAMS Accession No. ML13137A130), Southern Nuclear Operating Company (SNC), provided the NRC with its intended path forward for the resolution of GSI-191. SNC stated that we would be following the Option 2 risk-informed approach, partially due to high fiber levels in containment. SNC also referenced a Nuclear Energy Institute (NEI) letter dated May 4, 2012 (ADAMS Accession No. ML12142A316) as one of the documents providing guidance on the contents of SNC's submittals as a path forward. The NEI letter stated that licensees that do not meet very low in-vessel debris limits would provide, as part of the intended path forward, mitigative measures to reduce risk while taking actions to finalize resolution of Generic Letter 2004-02, "Potential Impact of Debris Blockage On Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors," (ADAMS Accession No. ML042360586).

By letter dated November 14, 2013, the NRC sent SNC a Request for Additional Information (RAI). The Enclosure contains the SNC response to the NRC RAI.

The NRC commitments contained in this letter are provided as a table in Enclosure 2. If you have any questions, please contact Ken McElroy at (205) 992-7369.

Mr. C. R. Pierce states he is Regulatory Affairs Director of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and, to the best of his knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,

C. R. Pierce

C. R. Pierce
Regulatory Affairs Director

CRP/RMJ/lac

Sworn to and subscribed before me this 13th day of December, 2013.

Dana Marie Williams
Notary Public

My commission expires: 12/1/2014

NOTARY PUBLIC STATE OF ALABAMA AT LARGE
MY COMMISSION EXPIRES: Dec 1, 2014
BONDED THRU NOTARY PUBLIC UNDERWRITERS



- Enclosures: 1. Response to NRC RAI
2. List of Regulatory Commitments

cc: Southern Nuclear Operating Company
Mr. S. E. Kuczynski, Chairman, President & CEO
Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer
Mr. T. E. Tynan, Vice President – Vogtle
Mr. B. L. Ivey, Vice President – Regulatory Affairs
Mr. B. J. Adams, Vice President – Fleet Operations
RType: CVC7000

U. S. Nuclear Regulatory Commission
Mr. V. M. McCree, Regional Administrator
Mr. R. E. Martin, NRR Senior Project Manager - Vogtle
Mr. L. M. Cain, Senior Resident Inspector – Vogtle

State of Georgia
Mr. J. H. Turner, Environmental Director Protection Division

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Enclosure 1

Response to NRC RAI

NRC RAI

SNC's May 16, 2013, letter did not identify that SNC had implemented, or identified for future implementation, any mitigative measures to deal with the potential for in-vessel blockage. SNC stated that it was evaluating Westinghouse recommendations for mitigative measures for in-vessel blockage and that appropriate procedure changes and operator training would be completed, as deemed necessary, following the evaluation. Please provide the mitigative measures chosen for the VEGP to deal with in-vessel blockage, should it occur.

SNC Response to NRC RAI

SNC will make changes to the Vogtle Units 1 and 2 Emergency Response Guidelines (ERGs). Specifically, after transferring to cold leg recirculation, Vogtle will monitor core exit temperatures, injection flow, and reactor vessel level indicating system (RVLIS) indications to identify any abnormal indications. Should abnormal indications exist, realignment to hot leg recirculation and back flowing through the reactor vessel will be necessary.

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Enclosure 2

List of Regulatory Commitments

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The following table identifies the regulatory commitments in this document. Any other statements in this submittal represent intended or planned actions. Such statements are provided for information purposes and are not considered to be regulatory commitments.

Commitment	Expected Completion Date
Make necessary changes to Vogtle Units 1 and 2 Emergency Response Guidelines in response to in-vessel blockage per Nuclear Licensing letter NL-13-2544.	December 31, 2015