

VoglecolRAIsPEm Resource

From: Jaffe, David
Sent: Thursday, April 03, 2014 10:21 AM
To: VoglecolRAIsPEm Resource
Subject: FW: Draft RAI Concerning Training Aspects of NTTF 4.2---Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)
Attachments: COLP RAI.docx

From: Jaffe, David
Sent: Thursday, April 03, 2014 9:18 AM
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Cc: CMEADORS@SOUTHERNCO.COM; Joshi, Ravindra; McGovern, Denise; Burkhart, Lawrence; Junge, Michael; Pelton, Rick
Subject: Draft RAI Concerning Training Aspects of NTTF 4.2---Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

The NRC staff is in the process of reviewing your August 22, 2013 response to Order Number EA-12-049 concerning Requirements for Mitigation Strategies for Beyond-Design-Basis External Events. One of the elements of the review involves the training that SNC will provide for the Vogtle Units 3 and 4 plant staff to cope with these types of events. The attached draft RAI has been developed; please review the draft and inform the staff as to whether any clarification is needed prior to final issuance of the RAI.

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Request for Additional Information 02
FUKUSHIMA NEAR-TERM TASK FORCE RECOMMENDATION 4.2
MITIGATION STRATEGIES FOR BEYOND-DESIGN-BASIS EXTERNAL EVENTS
Southern Nuclear Operating Co. (SNC)
Dockets 52-0025 and 52-0026

QUESTIONS

Commission Order EA-12-049 was issued on March 12, 2012 and directed that the licensees develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. The Order further required that licensees respond to a number of aspects of strategy development including that, "Full compliance shall include procedures, guidance, training, and acquisition, staging, or installing of equipment needed for the strategies."

On August 22, 2013, the licensee for Vogtle Units 3 and 4 submitted its overall integrated plan in response to the March 12, 2012 Order. In Enclosure 1 to its letter dated August 22, 2013, the licensee provided Westinghouse proprietary report, APP-GW-GLR-170, "AP1000 FLEX Integrated Plan." The Westinghouse report references Nuclear Energy Institute (NEI) 12-06 (Revision 0, August 2012), "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," for the process to be used by combined operating license (COL) holders to define and deploy strategies that will enhance their capability to cope with conditions resulting from beyond-design-basis external events.

Several sections of APP-GW-GLR-170 addressed "...procedures, guidance, training, and acquisition, staging, or installing of equipment needed for the strategies" as follows:

- A. Section 6, "Provide a Milestone Schedule," requires submission of a milestone schedule for "Training completion of the strategies."
- B. Section 7, "Identify How the Programmatic Controls will be Met" states that the programmatic controls for implementation of FLEX include training.
- C. Section 7a, "Describe Training Plan" states:
"Training will primarily consist of the typical objective-based procedure training that operators receive on these procedures and guidelines accompanied by simulator scenario training that integrate these hypothetical events. The training for the FLEX aspects of the AP1000 design will build upon the training that is already required for the post 72-hour operational requirements."

Training material for classroom presentation and simulator scenarios need to be developed in accordance with the systems approach to training (SAT) as delineated in 10 CFR 55.4. This includes the development of the following:

- 1. Objective-based classroom training for the procedures
- 2. Objective-based classroom training on the integration of the AP1000 design and operator responses and operator tasks for these beyond design basis events
- 3. Simulator scenarios
- 4. Exam items for all of this training as appropriate"

NEI 12-06, "Diverse and Flexible Coping Strategies (Flex) Implementation Guide," section 11.6 "Training" describes the training to ensure personnel proficiency in the mitigation of beyond-design-basis external event and section 13.1, "Overall Integrated Plan Submittal," states that the Overall Integrated Plan should provide a milestone schedule of planned actions.

While Attachment 2 to the August 22, 2013 response provides a Milestone Schedule that includes training, the NRC staff requests that SNC provide a projected milestone schedule for the design, development, and implementation of training for beyond-design-basis external events as proposed, above.