

VoglecolRAIsPEm Resource

From: Kallan, Paul
Sent: Wednesday, April 27, 2016 10:04 AM
To: VoglecolRAIsPEm Resource
Subject: Vogle Walkthrough Exemption for JPMs RAI letter 10.docx
Attachments: Vogle Walkthrough Exemption for JPMs RAI letter 10.docx

Hearing Identifier: Vogtle_COL_eRAIs
Email Number: 129

Mail Envelope Properties (79e194bdc04142e187c49082810212bc)

Subject: Vogtle Walkthrough Exemption for JPMs RAI letter 10.docx
Sent Date: 4/27/2016 10:03:58 AM
Received Date: 4/27/2016 10:03:58 AM
From: Kallan, Paul

Created By: Paul.Kallan@nrc.gov

Recipients:
"VogtlecolRAIsPEm Resource" <VogtlecolRAIsPEm.Resource@nrc.gov>
Tracking Status: None

Post Office: HQPWMSMRS07.nrc.gov

Files	Size	Date & Time
MESSAGE	3	4/27/2016 10:03:58 AM
Vogtle Walkthrough Exemption for JPMs RAI letter 10.docx		23979

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

April 27, 2016

Mr. B.H. Whitley, Director
Regulatory Affairs
Southern Nuclear Operating Company, Inc.
42 Inverness Center Parkway, B022
Birmingham, AL 35242

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 10 RELATED TO A WALKTHROUGH EXEMPTION FOR THE JOB-PERFORMANCE MEASURES FOR VOGTLE ELECTRIC GENERATING PLANT UNITS 3 AND 4 COMBINED LICENSES (TAC NO. RP9515)

Dear Mr. Whitley:

By letter dated April 15, 2016 (ADAMS Accession No. ML16109A013), Southern Nuclear Operating Company (SNC) requested an exemption from the plant walkthrough requirement of 10 CFR 55.46(b) and requirements in NUREG 1021, "Operator Licensing Examination Standards for Power Reactors", which is incorporated by reference in 10 CFR 55.40(a) and 10 CFR 55.40 (b), related to the development and administration of job-performance measures in the plant. Southern stated an exemption from the plant walkthrough requirement of 10 CFR 55.45(b) is necessary in order for SNC to administer the plant walkthrough portion of the operating test as described in NUREG-1021.

In the course of reviewing your request the NRC staff has identified the need for additional information. The request for additional information (RAI) is enclosed. Please respond to this RAI by May 5, 2016 of receipt of this letter.

If you have any questions or comments concerning this matter, please contact me at 301-415-2809 or Paul.Kallan@nrc.gov.

Sincerely

/RA/

Paul Kallan, Senior Project Manager
Licensing Branch 4
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-025
52-026
eRAI Tracking No. 8594

Enclosure:
Request for Additional Information 10

CC: see next page

If you have any questions or comments concerning this matter, please contact me at 301-415-2809 or Paul.Kallan@nrc.gov.

Sincerely

/RA/

Paul Kallan, Senior Project Manager
Licensing Branch 4
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-025
52-026
eRAI Tracking No. 8594

Enclosure:
Request for Additional Information 10

CC: see next page

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DATE	04/26/16	04/26/16	04/27/16

*Approval captured electronically in the electronic RAI system.

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Request for Additional Information 10

Issue Date: 04/27/2016
Application Title: VEGP Units 3 and 4 - LARs
Operating Company: Southern Nuclear Operating Co.
Docket No. 52-025 and 52-026
Review Section: 13.02.01 - Reactor Operator Requalification Program; Reactor Operator
Training
Application Section:

QUESTIONS

13.02.01-2

Title 10 of the *Code of Federal Regulations* (10 CFR) 55.45(b) states that “The operating test will be administered in a plant walk-through and in either — (1) a simulation facility that the Commission has approved for use after application has been made by the facility licensee under 10 CFR 55.46(b); (2) A plant-referenced simulator (PRS) that meets the criteria in 10 CFR 55.46(c); or (3) The plant, if approved by the Commission under 10 CFR 55.46(b).”

The regulations in 10 CFR 55.40, “Implementation,” require, in part, that operating tests be prepared in accordance with the criteria in NUREG-1021, “Operator Licensing Examination Standards for Power Reactors,” in effect six months before the examination date. NUREG-1021, ES-301, “Preparing Initial Operating Tests,” and ES-603, “Requalification Walk-Through Examinations,” prescribe how job performance measures (JPM) are developed and administered to applicants and licensees for the walk-through portion of the operating test.
Questions:

1. When in-plant systems JPMs are performed in the plant, the applicant or licensee must demonstrate that he or she has knowledge of the equipment locations, and the plant equipment provides a prop that he or she uses to demonstrate, via discussion and simulation (plant equipment is not operated), whether he or she has knowledge of how the task identified in the JPM is performed.

Enclosure 1, Page 4/11, of the letter from Karen Fili, Site Vice President, VEGP 3 & 4, to the NRC dated April 15, 2016 (ADAMS Accession No. ML16109A013) (April 15 letter), quotes Section 13.2A.3, “Conduct of On-the-Job Training (OJT)” of the Vogtle Electric Generating Plant Units 3&4 (VEGP 3&4) UFSAR, which states, “Until plant construction is completed, acceptable methods for the conduct of on-the-job training include discussion, simulation, and use of mockup equipment and virtual reality technology.” Enclosure 1 proposes to use these methods in lieu of performing in-plant systems job performance measures (JPMs) in the plant, which is under construction.

Enclosure 2, Page 3/14, states that “SNC [Southern Nuclear Company] has determined that JPMs can be created from the tasks in Table E-2 and that adequate evaluations can be performed using the Cold Licensing alternative methods.”

The April 15 letter does not describe how the tasks listed in Table E-2, "In-Plant Task List," will allow an applicant to demonstrate whether he or she has knowledge of plant locations or whether a sufficient prop (e.g., a mockup of a panel and/or plant layout diagrams) exists to be used during the JPM to allow the applicant to demonstrate, using discussion and/or simulation, whether he or she has knowledge of how to perform the task.

Please describe whether a JPM can be developed from the tasks listed in Table E-2 that would (1) include mockup equipment and/or virtual reality technology to provide a sufficient prop for the applicant or licensee to use during the JPM, and (2) allow an applicant to demonstrate knowledge of plant locations (if so, please describe how this could be accomplished).

2. NUREG-1021, ES-301, Section D.4.b states that "In addition, at least one of the tasks conducted in the plant shall evaluate the applicant's ability to implement actions required during an emergency or abnormal condition, and another shall require the applicant to enter the RCA. This provides an excellent opportunity for the applicant to discuss or demonstrate the radiation control administrative subjects."
Please (1) describe whether applicants will be able to demonstrate or discuss the radiation control administrative subjects using alternative methods in lieu entering the actual RCA and (2) describe any alternative methods that are proposed.
3. Enclosure 3, page 2/3, of the April 15 letter states that "classes would need to start well before fuel load." Given the projected date of fuel load stated in the April 15 letter, please describe any resource constraints or additional considerations that SNC has considered in requesting the NRC begin to administer the exams at this point in time.