

**Southern Nuclear**

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# *Plant Hatch NFPA 805 LAR Submittal Extension Request*

NRC/SNC Meeting  
June 21, 2016



# *Agenda*

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- Meeting Purpose and Schedule Request
- Reason for Schedule Extension
- NFPA-805 Transition Schedule
- Current Status of NFPA-805 Project
  - Fire PRA
  - Traditional FP Scope
- Summary / Questions / Actions

# *Summary & Purpose*

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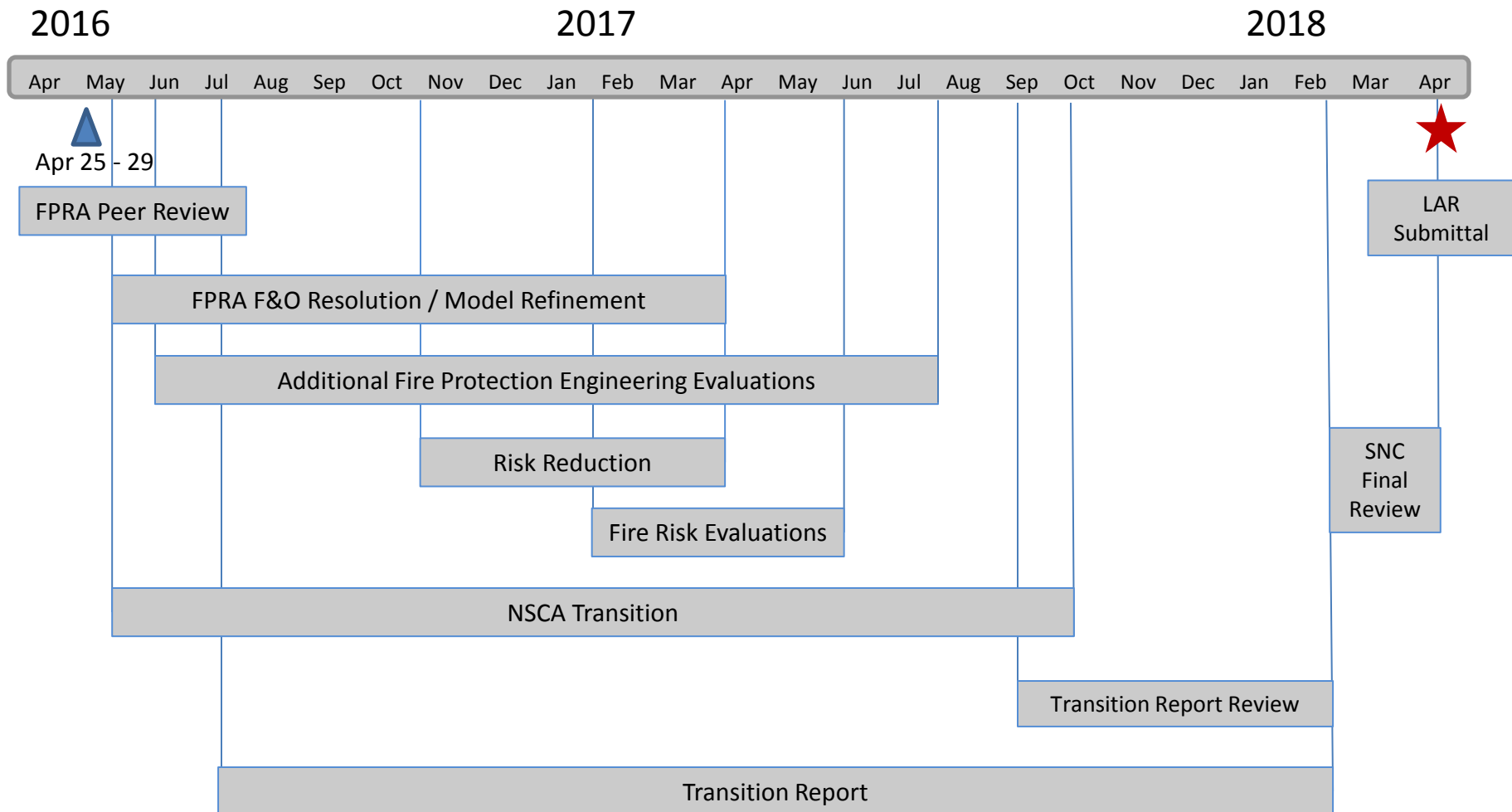
- NRC Granted Enforcement Discretion for 10 CFR 50.48(b) for Plant Hatch based on an NFPA-805 LAR submittal date of October 4, 2016
- Fire PRA development and plant modifications have delayed the fire protection transition project
- SNC intends to request an 18-month extension to the LAR submittal date
  - Demonstrate progress toward transition (SECY 12-0031)
  - Use NEI/Industry Template
- Purpose
  - Detail needed for extension request
  - Describe content and schedule of formal submittal
  - Discuss Hatch NFPA-805 Status to Date

# *Reasons for Schedule Change*

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- FPRA Peer Review completed April 2016
  - Additional tasks remain to resolve facts and observations
  - Refine FPRA model
- Add recent and future planned plant modifications
  - Requires additional time for development and implementation
    - FLEX modifications
    - Degraded Grid Voltage Protection modifications
- Safe Shutdown Analysis re-baseline compliance analysis completed December 2015
  - SSA subsequent evaluations still in progress [Potential risk for additional VFDRs]
    - Information Notice 92-18 mechanical evaluation – in progress
    - Control Building HVAC heat up analysis updates - in progress
- Additional Activities
  - FP Code Deviations
  - FP System Hydraulic Calculations
  - Engineering Equivalency Evaluations

## *Hatch NFPA 805 Transition Schedule 18 Month*



# *Project Status – Fire PRA*

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- Satisfactory FPRA Peer Review completed in April 2016
  - CDF is in the E-04 range
  - Additional tasks remaining
    - Facts and Observations resolution
    - Reduce CDF and LERF to meet RG 1.174 criteria for total risk via model refinement (e.g., take credit for installed FLEX, Degraded Grid Voltage Protection modifications) and planned plant modification identification
    - Perform Fire Risk Evaluations



# *Project Status – Traditional FP*

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- Fundamental FP Program and Design Elements
  - NFPA 805 Chapter 3 Requirements - review completed
  - NFPA Code Compliance Evaluation - review completed
  - Existing Engineering Equivalency Evaluations for adequacy - review completed
    - GL 86-10s
    - Licensing Actions – no exemptions will be retained



# NFPA-805 Status

LAR/TR Reference	Topic	% Complete
N/A	Safe shutdown Analysis Update (pre-requisite task)	90%
4.1, Attachment A	Fundamental FP Program Elements and Minimum Design Requirements (Table B-1)	75%
4.2.1, Attachment B	Nuclear Safety Capability Assessment - Methodology (Table B-2)	70%
Section 4.2.2, Attachment C	Nuclear Safety Capability Assessment - Fire Area – by - Fire Area Review (Table B-3)	50%
Section 4.3, Attachment D	Non Power Operational Modes (Table F-1)	60%
Section 4.4, Attachment E	Radioactive Release (Table G-1)	90%
Section 4.1.3, Attachment I	Definition of Power Block and Plant	100%
Section 4.2.2	Existing Engineering Equivalency Evaluation Transition	30%
Section 4.2.3, Attachment K	Licensing Action Transition	90%
Section 4.1.2.3, Attachment L	NFPA 805 Chapter 3 Requirements Not Met and Not Previously Approved by NRC	55%
N/A	Fire PRA Peer Review	100%
N/A	Fire PRA Peer Review F&O Closure	25%
Section 4.5.2.2	Fire Risk Evaluations	0%
Section 4.6	Monitoring Program	0%
Section 4.7	Program Documentation, Configuration Control, and Quality Assurance	0%
	Transition Report	5%



# *Non-conformances & Compensatory Measures*

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- Existing Non- conformances
  - NFPA code deviations
  - NSCA cable separation issues
- Compensatory Measures:
  - Fire watches for code deviations
  - Combination of fire watches and Alternative Compensatory Measures
  - NRC review of alternate comp measures during TFPI found program to be in conformance with RIS 2005-07

# *Summary / Questions*

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- Additional time is needed to submit the NFPA-805 LAR
  - incorporate scope of currently planned plant modifications
  - Refine FPRA model and conduct Fire Risk Evaluations
  - Perform conceptual design studies for any other necessary modifications
- Propose request for 18 month extension to submit the LAR
  - Use NFPA-805 template to document project status
  - Submit request to NRC by July 15, 2016