



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 16, 2017

LICENSEE: Southern Nuclear Operating Company.

FACILITY: Vogtle Electric Generating Plant, Unit Nos. 1 and 2

SUBJECT: SUMMARY OF JANUARY 18, 2017, PRE-LICENSING PUBLIC MEETING WITH SOUTHERN NUCLEAR OPERATING COMPANY, INC. TO DISCUSS THE INCORPORATION OF A SEISMIC PRA INTO THE 10 CFR 50.69 PROGRAM (CAC NOS. MF8761 AND MF8762)

On January 18, 2017, a Category 1 pre-licensing public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of Southern Nuclear Operating Company, Inc. (SNC, the licensee) at NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville, Maryland. The purpose of the meeting was to discuss an upcoming license amendment request to amend their Title 10 of the *Code of Federal Regulations* (10 CFR) 50.69 program to replace its seismic margins approach with a seismic Probabilistic Risk Assessment (PRA) for assessing the safety significance of structures, systems, and components at the Vogtle Electric Generating Plant (VEGP), Unit Nos. 1 and 2.

The meeting notice and agenda, dated June 3, 2016, are located at Agencywide Documents Access and Management System (ADAMS) Accession No. ML16172A039. The licensee provided two handouts for the meeting: a high level slide presentation and a "proposed basis for change" document or draft license amendment request (LAR). The slide presentation is available in ADAMS at Accession No. ML17004A049. The proposed basis for change document can be found in ADAMS at Accession No. ML17004A058. A list of meeting attendees is provided in the enclosure to this meeting summary.

Meeting Summary

After introductions, the licensee proceeded to the slide presentation, first providing an overview of the amendment request. The licensee stated that the current 10 CFR 50.69 program uses a seismic equipment list to determine the appropriate the Risk-Informed Safety Class (RISC) category. The licensee would like to use a seismic PRA in place of the seismic equipment list.

The NRC staff asked about the 10 CFR 50.69 inspection performed from June 13-30, 2016, and whether the inspection was solely on the 10 CFR 50.69 program. The licensee stated that the two week NRC inspection was focused solely on the 10 CFR 50.69 program.

The NRC staff inquired about the seismic safe shutdown equipment list (SSEL). The licensee stated that the seismic PRA will be the same one as provided in the Near Term Task Force Recommendation 2.1 response. The licensee stated that seismic PRA provides the true risk vs. the SSEL, which only looks at two paths deterministically. The PRA uses more variables, such as human interaction and other hazards, and is not just a qualitative approach.

The NRC staff pointed out that the statements of consideration from the 10 CFR 50.69 rulemaking (69 FR 68008) contain specific language relating to seismic design requirements and recommended that the licensee ensure that their LAR is consistent with this language.

The NRC staff stated that they will be reviewing the application for (1) if the seismic PRA is of sufficient quality to correctly classify systems, structures and components (SSCs) according to their RISC and (2) to verify that the licensee's procedures for relaxing specific treatment requirements are consistent with 10 CFR 50.69.

The licensee stated that their Seismic PRA meets American Society of Mechanical Engineers (ASME) PRA Standard Addendum B. The NRC staff noted that Addendum B has not been endorsed by the NRC staff for risk-informed LARs and that Regulatory Guide (RG) 1.200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," (ADAMS Accession No. ML090410014) endorses only Addendum A. A letter explaining the NRC staff's rationale for not endorsing Addendum B can be found at ADAMS Accession No. ML111720067.

Next, the licensee discussed the basis for the change document. The NRC staff inquired about the seismic fragilities of the seismic PRA. The licensee stated that the seismic fragilities were built into the model and reviewed during the peer review. The licensee stated they also incorporated the updated seismic hazard curves. The NRC staff stated that they would like to see a description of the changes being considered in the model within the application.

The NRC staff stated that a description of the peer review process the licensee used for the seismic PRA should be added to the application and that this description should explain what implementation level guidance (e.g., NEI-12-13) was used by the licensee to conduct the peer review.

The licensee stated that they do not intend to model FLEX for the application. The NRC staff stated that the LAR should include an explicit statement on how/whether FLEX equipment is modeled.

Finally, the licensee stated that they planned on submitting the amendment application at the end of February 2017.

One member of the public was in attendance. No Public Meeting Feedback Forms were received.

Please direct any inquiries to me at 301-415-3229 or Michael.Orenak@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael D. Orenak". The signature is fluid and cursive, with the first name "Michael" being more prominent than the last name "Orenak".

Michael D Orenak, Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-424 and 50-425

Enclosure:
List of Attendees

LIST OF ATTENDEES
JANUARY 18, 2017, PUBLIC MEETING WITH
SOUTHERN NUCLEAR OPERATING COMPANY, INC.
REGARDING SEISMIC PRA ADDITION TO THE 50.69 PROGRAM
VOGTLE ELECTRIC GENERATING PLANT, UNIT NOS. 1 AND 2

NAME	ORGANIZATION
Michael Orenak	U.S. Nuclear Regulatory Commission (NRC)
Michael Markley	NRC
CJ Fong	NRC
Shilp Vasavada	NRC
Gary Wang	NRC
David Heeszal	NRC
Nilesh Chokshi	NRC
Steven Dinsmore	NRC
Mihaela Biro	NRC
Michael Dudek	NRC (telephone)
Farhad Farzam	NRC (telephone)
Ken McElroy	Southern Nuclear Operating Company (SNC)
Pamela Burns	SNC
Faramarz Pournia	SNC
Owen Scott	SNC
Nicole Jackson	SNC
Jana Bergman	Curtis Wright

Enclosure

SUBJECT: SUMMARY OF JANUARY 18, 2017, PRE-LICENSING PUBLIC MEETING WITH SOUTHERN NUCLEAR OPERATING COMPANY, INC. TO DISCUSS THE INCORPORATION OF A SEISMIC PRA INTO THE 10 CFR 50.69 PROGRAM (CAC NOS. MF8761 AND MF8762) DATED FEBRUARY 16, 2017

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ADAMS Accession No.: ML17030A094

*via email

OFFICE	NRR/DORL/LPL2-1/PM	NRR/DORL/LPL2-1/LA	NRR/DRA/APLA/BC
NAME	MOrenak	KGGoldstein*	SRosenberg
DATE	02/13/2017	02/07/2017	02/15/2017
OFFICE	NRR/DORL/LPL2-1/BC	NRR/DORL/LPL2-1/PM	
NAME	MMarkley	MOrenak	
DATE	02/16/2017	02/16/2017	

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