



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

February 14, 2019

MEMORANDUM TO: Jennifer Dixon-Herrity, Chief
Licensing Branch 2
Division of Licensing, Siting, and
Environmental Analysis
Office of New Reactors

FROM: Jordan Hoellman, Project Manager /RA/
Licensing Branch 2
Division of Licensing, Siting, and
Environmental Analysis
Office of New Reactors

SUBJECT: SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR
OPERATING COMPANY ON DECEMBER 13, 2018

The U.S. Nuclear Regulatory Commission (NRC) staff held a Category 1 public meeting with Southern Nuclear Operating Company (SNC) on December 13, 2018. The purpose of the meeting was to discuss issues associated with the safety review of licensing actions for SNC's Vogtle Electric Generating Plant (VEGP) Units 3 and 4.

The meeting notice can be found in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML18323A088. The meeting notice is also posted on the NRC public website. Enclosures 1 and 2 are the meeting agenda and attendance list for the meeting, respectively. The other documents referenced during the discussion can be found at the ADAMS Accession Nos. given below:

- Inspections, Tests, Analyses, and Acceptance
Criteria (ITAAC) Optimization Presentation – ML18337A009

CONTACT: Jordan Hoellman, NRO/DLSE
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Summary of Meeting:

On December 13, 2018, staff from the NRC conducted a public meeting with representatives from SNC to discuss issues associated with the safety review of licensing actions for SNC's VEGP Units 3 and 4. Specifically, the meeting discussed technical details regarding SNC's ITAAC selection criteria to potentially remove duplicative ITAAC from VEGP Units 3 and 4 combined licenses.

SNC discussed their proposal for the screening and deposition of ITAAC for VEGP Units 3 and 4 using four proposed screening criteria:

1. Does the Tier 1 design description of the structure, system, or component (SSC) meet one or more of the selection criteria for certified design material in Updated Final Safety Analysis Report (UFSAR) 14.3.2.1?
2. Is there another ITAAC that shows reasonable assurance the Tier 1 design description has been constructed and will be operated?
3. Is there another regulatory process that provides reasonable assurance that the Tier 1 design description has been constructed and will be operated?
4. Does the ITAAC for the design description provide additional reasonable assurance that the Tier 1 design description has been constructed and will be operated?

SNC discussed the proposed screening criteria and provided examples of ITAAC that screen into each criteria that they are considering including in future license amendment requests to request removal of those ITAAC. Under Criterion 3, SNC proposes to take credit for a regulatory requirement in lieu of ITAAC, and plans to use emergency planning (EP) ITAAC as a pilot. As an example, SNC discussed that there is potentially no need for EP exercise-specific ITAAC since Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Appendix E requires an exercise for each subsequent reactor constructed on an existing site, and that the areas to be demonstrated are identified in EP regulations. SNC discussed that the conduct of the 10 CFR Part 50, Appendix E exercise would require the demonstration of these elements and no specific ITAAC would be required.

SNC encouraged staff feedback on the proposed screening criteria. Regarding Criteria 1 and 2, the staff noted that the criteria seem appropriate for consideration and that SNC will need to demonstrate how other ITAAC satisfy what the ITAAC proposed for deletion satisfies, or that the ITAAC does not meet the criteria for being an ITAAC. Regarding Criterion 3, the staff noted that the Atomic Energy Act of 1954, as amended (AEA), requires the NRC to, in part, identify within the combined license the ITAAC, including those applicable to EP, that, if met, are necessary and sufficient to provide reasonable assurance that the facility has been constructed and will be operated in conformity with the license, the AEA, and the Commission's rules and regulations. The staff discussed that because ITAAC are intended to provide reasonable assurance that the Commission's regulations are met, they would have to have more internal discussions to determine if Criterion 3 is appropriate.

SNC stated that they understood the staff's comments. The staff and SNC each agreed to discuss this proposal and the proposed screening criteria further internally before scheduling to discuss the topic again at a future public meeting.

At the end of the meeting, there was an opportunity for the public to provide comments and ask questions. There were no questions or comments from members of the public.

Docket Nos.: 052-025
052-026

Enclosure:
As stated

cc w/encls: See next page

SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR OPERATING COMPANY
ON DECEMBER 13, 2018 DATED: FEBRUARY 14, 2019

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ADAMS Accession No.: ML19016A372

*via e-mail

NRC-001

OFFICE	PM: DLSE/LB2	LA: DLSE/LB2	BC: DLSE/LB2	PM: DLSE/LB2
NAME	JHoellman (c)	RButler (c)	JDixon-Herrity (c)	JHoellman (s)
DATE	2/13/19	1/17/19	2/14/19	2/13/19

OFFICIAL RECORD COPY

**AGENDA FOR PUBLIC MEETING
U.S. NUCLEAR REGULATORY COMMISSION (NRC)
Thursday, December 13, 2018
9:00 a.m. – 11:00 a.m.**

PURPOSE: To discuss issues associated with the safety review of licensing actions for Southern Nuclear Operating Company's (SNC) Vogtle Electric Generating Plant (VEGP) Units 3 and 4.

OPEN

<u>Time</u>	<u>Topic</u>	<u>Led By</u>
9:00 a.m.	Opening Remarks	NRC
9:05 a.m.	Discussion of technical details regarding SNC's Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) selection criteria to potentially remove duplicative ITAAC from VEGP Units 3 and 4 combined licenses	NRC/SNC
11:00 a.m.	Opportunity for Public Comment	PUBLIC/NRC
11:00 a.m.	Adjourn	

Enclosure 1

PUBLIC MEETING
U.S. NUCLEAR REGULATORY COMMISSION
Thursday, December 13, 2018
9:00 a.m. – 11:00 a.m.

List of Attendees

Name	Organization
Representing the Nuclear Regulatory Commission	
Jordan Hoellman	NRO/DLSE/LB2
Jennifer Dixon-Herrity	NRO/DLSE/LB2
Robert Taylor	NRO/DLSE
Tim McGinty	NRO/DCIP
William Jones	NRO/DCIP
Michael Scott	NSIR/DPR
Bruce Musico	NSIR/DPR/RLB
Joseph Anderson	NSIR/DPR/RLB
Angelo Stubbs	NRO/DSRA/SCPB
Tim Lupold	NRO/DEI/MEB
Antonio Barrett	NRO/DSRA/SRSB
Tania Martinez Navedo	NRR/DE/EENB
Surinder Arora	NRO/DCIP/CIPB
Sujit Samaddar	NRO/DEI/SEB
Tom Scarbrough *	NRO/DEI/MEB
Michael Spencer *	OGC
Thomas Steinfeldt	OGC
Jack Frost *	NSIR/DPCP/RSB
Judy Petrucelli *	NSIR/DPCP/RSB
Eugene Guthrie *	RII/DRS/OB2
Jack Zhao	NRR/DE/EICA
Representing Industry	
Mike Yox	Southern Nuclear Operating Company (SNC)
Kelli Roberts	SNC
Tom Petrak	SNC
Steven Leighty	SNC
Amy Aughtman *	SNC
Catherine Prat *	SNC
Bob Beilke *	SNC
Gregg Larson *	SNC

Eric Fisher *	SNC
Russel Stroud *	SNC
Calvin Morrow *	SNC
John Hall *	SNC
Steve Erick *	SNC
Ted Amundson *	SNC
Representing Public	
Steve Franzone *	Florida Power & Light

* = participated via teleconference

Vogtle Units 3 & 4 Mailing List

(Revised 08/16/2018)

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Mr. Wayne Guilfoyle
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Gwendolyn Jackson
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