

August 16, 2019

Docket Nos.: 52-025
52-026ND-19-0753
10 CFR 50.90U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant - Units 3 and 4
Emergency Preparedness Communications Assessment Requested by NRC Letter,
Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f)
Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force
Review of Insights from the Fukushima Dai-ichi Accident dated March 12, 2012

References:

1. NRC Letter, *"Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident"* dated March 12, 2012, (Agencywide Documents Access and Management System (ADAMS) Accession Number 12053A340)
2. Southern Nuclear Operating Company letter to NRC, *"60-Day Response to NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Daiichi Accident"* dated May 9, 2012 (Letter ND-12-0987), (ADAMS Accession Number ML12131A540)
3. Southern Nuclear Operating Company letter to NRC, *"Supplement to 60-Day Response to NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Daiichi Accident"* dated June 28, 2012 (Letter ND-12-1364), (ADAMS Accession Number ML121850029)
4. NRC Letter, *"Vogtle Electric Generating Plant Units 3 and 4 - Review of 60-Day Response to a Request for Information Regarding Recommendation 9.3, of the Near-Term Task Force Related to the Fukushima Daiichi Nuclear Power Plant Accident"* dated July 31, 2012, (ADAMS Accession Number ML12201B409)
5. NRC Letter, *"Follow-up Letter on Technical Issues for Resolution Regarding Licensee Communication Submittals Associated with Near-Term Task Force Recommendation 9.3,"* dated January 23, 2013, (ADAMS Accession Number ML13010A162)

Ladies and Gentlemen:

The U.S. Nuclear Regulatory Commission (NRC) requested information from nuclear power plant licensees regarding the identification of enhancements that could provide a means to power equipment needed to communicate onsite and off-site during an extended loss of all alternating current (AC) power event. An assessment of communications systems capabilities is necessary to respond to specific information contained in NRC letter, *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendation 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insight from the Fukushima Dai-Ichi Accident*, dated March 12, 2012 (Reference 1). Enclosure 5 of the NRC letter requested that nuclear power plant licensees assess current communications systems and equipment used during an emergency event given a set of standard assumptions. The letter also requested licensees to consider enhancements that may be appropriate for the emergency plan with respect to communications requirements of 10 CFR 50.47, Appendix E to 10 CFR Part 50, and the guidance in NUREG-0696, *Functional Criteria for Emergency Response Facilities*, in light of the set of the standard assumptions discussed in the letter. Licensees were asked to consider the means necessary to power the new and existing communications equipment during a multi-unit event, with a loss of all AC power.

By letter dated May 9, 2012 (Reference 2) and supplemented by letter dated June 28, 2012 (Reference 3), Southern Nuclear Operating Company (SNC) submitted its 60-day response for Vogtle Electric Generating Plant (VEGP) Units 3 and 4 proposing an alternative course of action based upon the units currently being under construction. The alternative course of action included revised due dates to provide the requested information and the basis for those dates. By letter dated July 31, 2012 (Reference 4), the NRC concluded that the licensee provided an adequate basis for its proposed alternative to responding to the 50.54(f) request for information regarding communications and staffing for Near-Term Task Force (NTTF) Recommendation 9.3.

The enclosure to this letter provides the results of the communications assessment for VEGP Units 3 and 4 in response to the 50.54(f) request for information regarding communications. Please note that this response is based on the current design and installation planned for Vogtle Units 3 and 4. The estimated completion dates and implementation milestones supersede those contained in previous SNC letter dated May 9, 2012 (Reference 2) and are subject to change as construction schedules evolve.

On January 23, 2013, the NRC issued a letter (Reference 5) to all power reactor licensees and holders of construction permits in active or deferred status. The enclosure to that letter identified eight generic technical issues needing resolution to determine a licensee's communications capability regarding a station black-out (SBO) event. Section 5 of the enclosure to this letter addresses each of these eight generic issues.

This letter contains no regulatory commitments. Should you have questions regarding this submittal, please contact Mr. Steven Leighty at (706) 848-6790.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 16th day of August 2019.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

A handwritten signature in black ink that reads "Kella Roberts for MJY". The signature is written in a cursive, flowing style.

Michael J. Yox
Regulatory Affairs Director
Vogtle 3 & 4

MJY/DWM/sfr

Enclosure: Vogtle Electric Generating Plant (VEGP) Units 3 and 4 –
Emergency Preparedness Communications Assessment

cc:

Southern Nuclear Operating Company / Georgia Power Company

Mr. S. E. Kuczynski (w/o enclosures)
Mr. P. P. Sena III (w/o enclosures)
Mr. M. D. Meier (w/o enclosures)
Mr. D. H. Jones (w/o enclosures)
Mr. G. Chick
Mr. D. L. McKinney (w/o enclosures)
Mr. T. W. Yelverton (w/o enclosures)
Mr. B. H. Whitley
Ms. C. A. Gayheart
Mr. C. R. Pierce
Ms. M. Ronnlund
Mr. D. L. Fulton
Mr. M. J. Yox
Mr. C. T. Defnall
Mr. J. Tupik
Ms. S. Agee
Ms. A. Gibson
Ms. A. C. Chamberlain
Mr. S. Leighty
Mr. E. Riffle
Ms. K. Roberts
Mr. J. Haswell
Mr. D. T. Blythe
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Nuclear Regulatory Commission

Mr. W. Jones (w/o enclosures)
Ms. J. Dixon-Herrity
Mr. C. Patel
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Mr. G. Khouri
Ms. S. Temple
Mr. F. Brown
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Mr. P.J. Heher
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State of Georgia

Mr. R. Dunn

Oglethorpe Power Corporation

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Ms. A. Whaley

Municipal Electric Authority of Georgia

Mr. J. E. Fuller

Mr. S. M. Jackson

Dalton Utilities

Mr. T. Bundros

Westinghouse Electric Company, LLC

Mr. L. Oriani (w/o enclosures)

Mr. T. Rubenstein (w/o enclosures)

Mr. M. Corletti

Mr. M. L. Clyde

Mr. D. Hawkins

Mr. J. Coward

Other

Mr. S. W. Kline, Bechtel Power Corporation

Ms. L. A. Matis, Tetra Tech NUS, Inc.

Dr. W. R. Jacobs, Jr., Ph.D., GDS Associates, Inc.

Mr. S. Roetger, Georgia Public Service Commission

Ms. S. W. Kernizan, Georgia Public Service Commission

Mr. K. C. Greene, Troutman Sanders

Mr. S. Blanton, Balch Bingham

NDDocumentinBox@duke-energy.com, Duke Energy

Mr. S. Franzone, Florida Power & Light