



Vogtle Electric Generating Plant, Units 1 and 2

Meeting Participants:

**NRC; Southern Nuclear Operating Company; &
Interested Members of Public**

September 5, 2019

Time: 10 am EDT

**John Lamb, DORL Project Manager
Office of Nuclear Reactor Regulation**

Topic of Discussion

License Amendment Request To Revise Endstate From Hot Shutdown To Cold Shutdown For Technical Specifications:

- **TS 3.7.7 Component Cooling Water (CCW)
System**
- **TS 3.7.8 Nuclear Service Cooling Water (NSCW)
System**

ADAMS Accession Number ML19190A309

Proposed LCO 3.7.7 (**3.7.8**)

APPLICABILITY: MODES 1, 2, 3, and 4.

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. -----NOTES----- 1. Not applicable when second CCW (NSCW) train intentionally made inoperable. 2. The following Section 5.5.22 constraints are applicable: parts b, c.2, c.3, d, e, f, g, and h. ----- Two CCW (NSCW) trains inoperable.	C.1 Restore CCW (NSCW) trains to OPERABLE status.	1 hour <u>OR</u> In accordance with the Risk Informed Completion Time Program
D. Required Action and associated Completion Time of Condition C not met.	D.1 Be in MODE 3. <u>AND</u> D.2 Be in MODE 5.	6 hours 36 hours

Issue

Proposed Condition D would be entered into:

- Within one hour after both CCW **(NSCW)** trains are TS inoperable & PRA non-functional; or
- Within the RICT if at least one train is PRA functional while both trains are TS inoperable.

Staff Concern

The means of achieving and maintaining end state is unclear, given that no trains might be PRA Functional.

Staff Observations

Alternative means of cool down to Mode 5:

- Mode 5 shutdown cooling requirements could be achieved with the two fully flooded steam generators (TS B 3.4.7 RCS Loops—MODE 5, Loops Filled)
- One RHR pump, with attendant seal cooler CCW needs, required to circulate the water through the RCS at a sufficient rate to prevent boric acid stratification. (FSAR Section 9.2.2.1.1B)

Staff Observations

- WCAP-16294-NP, Revision 0 was intended to apply when only one train of a system is inoperable.
- NUREG-1431 TS 3.7.7 and TS 3.7.8 do not address a Condition of both trains inoperable.
- Bases of VEGP TS 3.0.3 state that exceptions are provided to the LCO 3.0.3 actions where requiring a unit shutdown/cooldown would not provide appropriate remedial measures.

Discussion

Since the CCW and NCSW systems must be at least PRA functional to put the plant in Mode 5, the staff **seeks clarity on** why Mode 5 rather than some alternate remedial measure is the appropriate end-state for Condition D?