



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

January 27, 2020

MEMORANDUM TO: Victor E. Hall, Chief
Vogtle Project Office
Office of Nuclear Reactor Regulation

FROM: Jennivine Rankin, Project Manager **/RA/**
Vogtle Project Office
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR
OPERATING COMPANY ON JANUARY 16, 2020

The U.S. Nuclear Regulatory Commission (NRC) staff held a Category 1 public meeting with Southern Nuclear Operating Company (SNC) on January 16, 2020. The purpose of the meeting was to discuss SNC's submittal of the Vogtle Electric Generating Plant (VEGP) Unit 3 and 4 plant-specific emergency action levels (EALs) and the license amendment request (LAR) regarding reconciliation of environmental conditions inputs to civil structural design licensing basis.

The meeting notice can be found in Agencywide Documents Access and Management System (ADAMS) Accession No. ML19322C790. 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:

• Submittal of Plant-Specific Emergency Action Levels in Accordance with License Condition 2.D(12)(d)	ML19284C114
• LAR-19-019: Reconciliation of Environmental Conditions Inputs to Civil Structural Design Licensing Basis	ML19347C046
• LAR-19-019 Discussion Topics	ML20014D563 ML20015A510

CONTACT: Jennivine Rankin, NRR/VPO
(301) 415-1530

Summary of Meeting:Technical Discussion of Submittal of Plant-Specific Emergency Action Levels in Accordance with License Condition 2.D(12)(d)

On January 16, 2020, staff from the NRC conducted a public meeting with representatives from SNC to discuss the submittal of the VEGP EAL Scheme. The VEGP COL License Condition 2.D.(12)(d) states, "No later than 180 days before initial fuel load, SNC shall submit to the Director of NRO, or designee, in writing, a fully developed set of plant-specific emergency action levels (EALs) for Vogtle Unit 3 [and Unit 4] in accordance with the criteria defined in Amendment No. 77 [76 for Unit 4]. The EALs shall have been discussed and agreed upon with State and local officials." The license condition is in place in part, to confirm specific actions, found in Attachment 5 within Enclosure 8 of SNC's January 31, 2017 (ADAMS Accession No. ML17031A445), submittal, were completed in accordance with the criteria defined in Amendment Nos. 77 and 76. The specific items are referred to as LC1 through LC8 below. In a letter dated October 11, 2019, SNC submitted an EAL scheme in response to the license condition (ADAMS Accession No. ML19284C118).

Since the October 11, 2019, submittal is not a licensing action, NRC's review was cursory to obtain an assessment of whether specific actions found in Attachment 5 within Enclosure 8 of SNC's January 31, 2017, submittal were addressed in accordance with the criteria defined in Amendment Nos. 77 and 76. The NRC staff identified that the EAL scheme does contain changes made by SNC under 10 CFR 50.54(q)(3) without prior NRC approval, which have not yet been inspected. The NRC may elect to review these changes made under 50.54(q)(3) against the previous NRC-approved EAL scheme as an inspection action in the future to determine whether the changes made by SNC in its October 11, 2019, submittal constituted a reduction in effectiveness by significantly altering the EAL scheme criteria defined in Amendment Nos. 77 and 76.

The NRC staff noted the following potential questions if the inspection was conducted today:

- The note contained in Section 1.1 of SNC's October 11, 2019 submittal states the "EAL radiation monitor setpoint calculations document SV0-GSEP-N0C-90000 is 'Approved Pending' due to future potential design change updates as Vogtle 3&4 is being constructed." The NRC staff would need to review the final calculations to confirm completion of LC2-LC8.
- For LC3, SNC did not provide the calculation for the effluent radiation monitor threshold values in RA1. Also, SNC removed an instrument used in the approved EAL scheme (VFS-RY-103).
- For LC6, SNC did not provide the calculation for the containment radiation monitor supporting the fuel clad loss threshold value in Fission Product Barrier Criteria "Fuel Clad-Loss 3.A." In addition, SNC changed the engineering units from "R/hr" to "rad/hr." These are separately defined terms in 10 CFR Part 20, and depending on the type of radiation, and the associated energy level, the numbers can be quite different. The NRC staff noted SNC did this in other areas of its package and appears to assume a 1:1 ratio, which depending of the type of radiation, may not be true.

- Documentation (available for inspection) that EALs, including changes made under 50.54(q) as part of the license condition submittal, have been discussed and agreed upon with State and local officials.

NRC staff notes that based on an estimated fuel load date of November 23, 2020, the 180 day milestone for completion of COL License Condition 2.D.(12)(d) would be May 26, 2020, which provides time to facilitate any additional changes SNC might elect to make prior to 180 days before initial fuel load.

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

Technical Discussion of LAR-19-019: Reconciliation of Environmental Conditions Inputs to Civil Structural Design Licensing Basis

On January 16, 2020, staff from the NRC conducted a public meeting with representatives from SNC to discuss LAR-19-019. The discussion is summarized below:

- The NRC staff noted that in Enclosure 2 of the LAR, the final column in UFSAR Table 3H.5-9 (Sheet 1 of 3 and 2b of 3) includes required/provided ratio values of 1.0 and 0.99 respectively; however, the footnote states that a 2 percent value that may be added to the design limit as an allowance for minor variances. The NRC staff notes that this would increase the ratios above 1.0. SNC agreed that a revision to the tables would be needed. In addition, the NRC staff noted a typographical error regarding the spelling of the acronym for spent fuel pool (SFP).
- The NRC staff noted that the LAR describes temperature changes that will be evaluated for several structures at VEGP Units 3 and 4; however, the LAR does not address the impact of those temperature changes on the capability of pumps or valves to perform their design functions. SNC clarified that there are not any changes to the design specifications for pumps, valves, or piping at VEGP Units 3 and 4 as a result of the LAR.
- SNC intends to submit a supplement to the LAR to clarify both issues.

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

Docket Nos.: 52-025
52-026

Enclosure:
As stated

cc w/encls: See next page

SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR OPERATING COMPANY
ON JANUARY 16, 2020 DATED:

DISTRIBUTION:

PUBLIC	VHall, NRR
RidsOpaMail	RidsAcraAcnwMailCenter
RidsOgcMailCenter	PPatel, NRR
RidsRgn2MailCenter	CJohnson, NSIR
NRR_VPO Distribution	JAnderson, NSIR
TScarborough, NRR	BLehman, NRR

ADAMS Accession No.: ML20017A074

***via e-mail**

NRC-001

OFFICE	PM: NRR/VPO	LA: NRR/VPO	PM: NRR/VPO	BC: NRR/VPO
NAME	JRankin* (c)	RButler*	CSantos*	VHall*
DATE	1/17/2020	1/17/2020	1/21/2020	1/24/2020
OFFICE	PM: NRR/VPO			
NAME	JRankin (s)			
DATE	1/27/2020			

OFFICIAL RECORD COPY

**AGENDA FOR PUBLIC MEETING
U.S. NUCLEAR REGULATORY COMMISSION (NRC)
Thursday, January 16, 2020
Teleconference
9:00 a.m. – 12:00 p.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
9:10 a.m.	Discussion of Identified Topics	NRC/SNC
	Opportunity for Public Comment	NRC/Public
	Open Portion Concludes	

<u>CLOSED</u>	(If needed)	NRC/SNC
12:00 p.m.	Adjourn	

PUBLIC MEETING
U.S. NUCLEAR REGULATORY COMMISSION
Thursday, January 16, 2020
One White Flint North, Room O-11B4
9:00 a.m. – 12:00 p.m.

List of Attendees

Name	Organization
Representing the Nuclear Regulatory Commission	
Jennivine Rankin Olivier Lareynie Jukka Kallionpaa Don Habib Chandu Patel	NRR/VPO
Clay Johnson Don Johnson Joe Anderson Dan Barss* Kathy Brock*	NSIR
Jody Martin	OGC
Eugene Guthrie*	RII
Tom Scarbrough Bryce Lehman Pravin Patel	NRR/DEX
Representing Industry	
Kelli Roberts* Shannon Ramey* John Hall* Ted Amundson* Jonathan Hartman* Ricky Collings* Amy Chamberlain* Nick Kellenberger* Eddie Grant* Adam Quarles* Jason Weathersby* John Varnadore* Yasmeem Arafeh* Stephanie Agee* Mark Humphrey*	Southern Nuclear Operating Company
Si Wu* Zach Harper* Michael Patterson* Jessica Phillips* Edward Drake*	Westinghouse Electric Company
Public Participants	
Gregory Richardson*	Engineering Planning and Management

* = participated via teleconference

Vogtle Mailing List

(Revised 11/12/2019)

cc:

Resident Manager
Oglethorpe Power Corporation
Alvin W. Vogtle Nuclear Plant
7821 River Road
Waynesboro, GA 30830

Resident Inspector
Vogtle Plant Units 3 & 4
8805 River Road
Waynesboro, GA 30830

Office of the Attorney General
40 Capitol Square, SW
Atlanta, GA 30334

Mr. Barty Simonton
Team Leader
Environmental Radiation Program
Air Protection Branch
Environmental Protection Division
4244 International Parkway, Suite 120
Atlanta, GA 30354-3906

Southern Nuclear Operating Company
Document Control Coordinator
3535 Colonnade Parkway
Birmingham, AL 35243

Brian H. Whitley
Regulatory Affairs Director
Southern Nuclear Operating Company
3535 Colonnade Parkway, BIN N-226-EC
Birmingham, AL 35243

Anne F. Appleby
Oglethorpe Power Corporation
2100 East Exchange Place
Tucker, GA 30084

Mr. Michael Yox
Site Regulatory Affairs Director
Vogtle Units 3 & 4
7825 River Road, Building 302 (ESB)
Bin 6031
Waynesboro, GA 30830

County Commissioner
Office of the County Commissioner
Burke County Commission
Waynesboro, GA 30830

Mr. Wayne Guilfoyle
Commissioner District 8
Augusta-Richmond County Commission
4940 Windsor Spring Rd
Hephzibah, GA 30815

Gwendolyn Jackson
Burke County Library
130 Highway 24 South
Waynesboro, GA 30830

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
Atlanta, GA 30334

Vogtle Mailing List

Email

aagibson@southernco.com (Amanda Gibson)
acchambe@southernco.com (Amy Chamberlian)
awc@nei.org (Anne W. Cottingham)
becky@georgiawand.org (Becky Rafter)
bhwhitley@southernco.com (Brian Whitley)
Bill.Jacobs@gdsassociates.com (Bill Jacobs)
corletmm@westinghouse.com (Michael M. Corletti)
crpierce@southernco.com (C.R. Pierce)
dahjones@southernco.com (David Jones)
david.hinds@ge.com (David Hinds)
david.lewis@pillsburylaw.com (David Lewis)
dlfulton@southernco.com (Dale Fulton)
ed.burns@earthlink.net (Ed Burns)
edavis@pegasusgroup.us (Ed David)
G2NDRMDC@southernco.com (SNC Document Control)
George.Taylor@opc.com (George Taylor)
harperzs@westinghouse.com (Zachary S. Harper)
james1.beard@ge.com (James Beard)
JHaswell@southernco.com (Jeremiah Haswell)
jim@ncwarn.org (Jim Warren)
John.Bozga@nrc.gov (John Bozga)
Joseph_Hegner@dom.com (Joseph Hegner)
karlg@att.net (Karl Gross)
kmstacy@southernco.com (Kara Stacy)
kroberts@southernco.com (Kelli Roberts)
KSutton@morganlewis.com (Kathryn M. Sutton)
kwaugh@impact-net.org (Kenneth O. Waugh)
markus.popa@hq.doe.gov (Markus Popa)
mdmeier@southernco.com (Mike Meier)
media@nei.org (Scott Peterson)
Melissa.Smith@Hq.Doe.Gov (Melissa Smith)
mike.price@opc.com (M.W. Price)
MKWASHIN@southernco.com (MKWashington)
mphumphr@southernco.com (Mark Humphrey)
MSF@nei.org (Marvin Fertel)
nirsnet@nirs.org (Michael Mariotte)
Nuclaw@mindspring.com (Robert Temple)
Paul@beyondnuclear.org (Paul Gunter)
pbessette@morganlewis.com (Paul Bessette)
ppsena@southernco.com (Peter Sena, III)
r.joshi15@comcast.net (Ravi Joshi)
rwink@ameren.com (Roger Wink)
sabinski@suddenlink.net (Steve A. Bennett)
sara@cleanenergy.org (Sara Barczak)

Vogtle Mailing List

sblanton@balch.com (Stanford Blanton)
Shiva.Granmayeh@hq.doe.gov (Shiva Granmayeh)
sjackson@meagpower.org (Steven Jackson)
sjones@psc.state.ga.us (Shemetha Jones)
skauffman@mpr.com (Storm Kauffman)
slieghty@southernco.com (Steve Leighty)
sroetger@psc.state.ga.us (Steve Roetger)
syagee@southernco.com (Stephanie Agee)
TomClements329@cs.com (Tom Clements)
Vanessa.quinn@dhs.gov (Vanessa Quinn)
wayne.marquino@gmail.com (Wayne Marquino)
weave1dw@westinghouse.com (Doug Weaver)
William.Birge@hq.doe.gov (William Birge)
X2edgran@southernco.com (Eddie R. Grant)
x2gabeck@southernco.com (Gary Becker)
X2hagge@southern.com (Neil Haggerty)
X2wwill@southernco.com (Daniel Williamson)