

Southern Nuclear Operating Company

ND-20-0165

Enclosure

Vogtle Electric Generating Plant Units 3 and 4

**Thirteenth Six-Month Status Report of the Implementation of
the Requirements of the Commission Order with Regard to
Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049)**

(This enclosure consists of 5 pages including this cover page)

1 Introduction

Vogtle Electric Generating Plant - Units 3 and 4 developed an Overall Integrated Plan (Reference 1 in Section 8), documenting the diverse and flexible strategies (FLEX), in response to Nuclear Regulatory Commission Order EA-12-049 (Reference 2). This status report provides an update of milestone accomplishments since the last six-month update, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2 Milestone Accomplishments

In addition to the submittal of status reports, the following milestone(s) directly related to FLEX implementation have been completed since the last six-month update (Reference 3), and are current as of February 22, 2020:

- Unit 3 Staffing Analysis Complete

3 Milestone Schedule Status

The following table provides an update to the milestone schedule. The table provides the activity status of each item and indicates whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed.

During this six-month reporting period, modifications were made to the following line items:

- **Staffing Analysis Complete** - the existing line item was revised to Unit 3 only and a new Milestone added for the Units 3 and 4 analysis
- **Develop Response Plan with National SAFER Response Center (NSRC) (storage plan and procedural guidance for strategy/maintenance)** – the individual line items for Unit 3 and Unit 4 are combined into one Milestone since the Response Plan will apply to both Unit 3 and Unit 4. Note: Prior to the August 2019 six-month submittal there was one Milestone for Units 3 and 4.
- **Initiate Phase 3 Equipment Procurement** – the individual line items for Unit 3 and Unit 4 are combined into one Milestone since the equipment is procured concurrently for Units 3 and 4. Note: Prior to the August 2019 six-month submittal there was one Milestone for Units 3 and 4.
- **National SAFER Response Center (NSRC) Operational** - the individual line items for Unit 3 and Unit 4 are combined into one Milestone for Units 3 and 4. Note: Prior to the February 2019 six-month submittal there was one Milestone for Units 3 and 4.

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Milestone	Target Completion Date	Activity Status	Revised Target Completion Date (Feb 22, 2020 data date)
Submit 60 Day Status Report	Oct 2012	Complete	N/A
Submit Overall Integrated Plan (OIP)	Aug 2013	Complete	N/A
Submit 6 Month Status Report	Feb 2014	Complete	N/A
Submit 6 Month Status Report	Aug 2014	Complete	N/A
Submit 6 Month Status Report	Feb 2015	Complete	N/A
Submit 6 Month Status Report	Aug 2015	Complete	N/A
Submit 6 Month Status Report	Feb 2016	Complete	N/A
Submit 6 Month Status Report	Aug 2016	Complete	N/A
Submit 6 Month Status Report	Feb 2017	Complete	N/A
Submit 6 Month Status Report	Aug 2017	Complete	N/A
Submit 6 Month Status Report	Feb 2018	Complete	N/A
Submit 6 Month Status Report	Aug 2018	Complete	N/A
Submit 11 th 6-Month Status Report	Feb 2019	Complete	N/A
Submit 12 th 6-Month Status Report	Aug 2019	Complete	N/A
Staffing Analysis Complete Unit 3	Oct 2019	Complete	N/A
Submit 13 th 6-Month Status Report	Feb 2020	Complete	N/A
Develop FLEX training	Feb 2020	In Progress	May 2020
Initiate Phase 3 Equipment Procurement – Units 3 and 4	Feb 2020	Complete	N/A
Ensure remaining BDB Nuclear Management Procedure (NMP) revisions and program documents (e.g., EOF, TSC, and SEC responses, EP procedures) include necessary information	Mar 2020	In Progress	Apr 2020
Ensure Operations' BDB procedures (e.g., FSGs/SIGs) include necessary information	Jun 2020	In Progress	N/A
Develop Response Plan with National SAFER Response Center (NSRC) (storage plan and procedural guidance for strategy/maintenance) – Units 3 and 4	Dec 2019	In Progress	Aug 2020
Submit 14 th 6-Month Status Report	Aug 2020	Not Started	N/A
Training complete and documented for Phase 3 to include connection and use of redundant offsite equipment for Ancillary Equipment.	Aug 2020	In Progress	Oct 2020
NSRC Operational for Units 3 and 4	Jun 2020	Not Started	Aug 2020
Submit Order EA-12-049 Compliance Report for Unit 3	Sept 2020	Not Started	Nov 2020
Submit 15 th 6-Month Status Report	Feb 2021	Not Started	N/A
Submit 16 th 6-Month Status Report	Aug 2021	Not started	N/A
Staffing Analysis Complete Units 3 and 4	May 2021	Not Started	N/A

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Milestone	Target Completion Date	Activity Status	Revised Target Completion Date (Feb 22, 2020 data date)
Submit Order EA-12-049 Compliance Report for Unit 4 and Final Integrated Plan (FIP)	Sept 2021	Not started	N/A

4 Changes to Compliance Method

There are no changes to the compliance method as documented in Reference 1.

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

Vogtle Electric Generating Plant - Units 3 and 4 expects to comply with the order implementation date and no relief/relaxation is required at this time.

6 Open Items from Overall Integrated Plan and Draft Safety Evaluation

The following tables provide a summary of the open items documented in the Overall Integrated Plan or the Draft Safety Evaluation (SE) and the status of each item.

Overall Integrated Plan Open Item	Status
N/A	N/A

Draft Safety Evaluation Open Item	Status
Draft Safety Evaluation not received	N/A

7 Potential Draft Safety Evaluation Impacts

A Draft Safety Evaluation has not been received.

8 References

The following references support the updates to the Overall Integrated Plan described in this enclosure.

1. SNC Letter ND-13-1702, *Vogtle Electric Generating Plant Units 3 and 4 Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)*, dated August 22, 2013.
2. NRC Order Number EA-12-049, *Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events*, dated March 12, 2012.

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3. SNC letter ND-19-0880, *Vogtle Electric Generating Plant – Units 3 and 4 Twelfth Six-Month Status Report of the Implementation of the Requirements of the Commission Order with Regard to Mitigation Strategies for Beyond-Design-Basis External Events (EA-12-049)*, dated August 27, 2019.
4. 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* (Accession No. ML12053A340), dated March 12, 2012.