



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

March 30, 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 MARCH 19, 2020

The U.S. Nuclear Regulatory Commission (NRC) staff held a Category 1 public meeting with Southern Nuclear Operating Company (SNC) on March 19, 2020. The purpose of the meeting was to discuss a draft exemption request to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52, Appendix D for Tier 1 plant-specific design control document (DCD) requirements.

The meeting notice can be found in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML20076B782. 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 draft exemption request and presentation slides associated with the meeting can be found at ADAMS Accession Nos. ML20069A003 and ML20076A558, respectively.

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Summary of Meeting:

On March 19, 2020, staff from the NRC conducted a public meeting with representatives from SNC to discuss a draft exemption request to 10 CFR Part 52, Appendix D, regarding requirements to maintain a Tier 1 plant-specific DCD during the operating phase of the Combined License. The draft exemption would permit SNC to designate the Tier 1 plant-specific DCD as historical information, no longer update the Tier 1 plant-specific DCD, nor evaluate future changes to Tier 2 plant-specific DCD information for impact to Tier 1 information. SNC stepped through the basis for the exemption. Notable discussion topics are highlighted below:

- SNC noted the reason for the change was to align the license change control process with the fleet following construction. As Vogtle Electric Generating Plant, Units 3 and 4 would likely be the only AP1000 nuclear plants in the United States, SNC indicated a potential for unnecessary burden as a result of standardization.
- SNC noted that this draft exemption would not affect any of the licensing actions currently under review and would only apply following the completion of construction.
- SNC noted that Tier 1 is derived from Tier 2. The exemption request does not negate Tier 2 being screened through the change control process in 10 CFR Part 52, Appendix D, Section VIII.B.5.b for prior NRC approval.
- The NRC staff noted that there are concerns with the proposed exemption because of the premise of Tier 1 and the role it has in 10 CFR Part 52. Historically, the existence of Tier 1 has been relied upon in NRC decision-making because of the control of Tier 1 information required by the regulations.
- The NRC staff noted that SNC should determine if there are any consequences on other approvals or processes such as Tier 2* or Inspections, Tests, Analyses, and Acceptance Criteria.
- The NRC staff noted that the change control process in 10 CFR Part 52, Appendix D, Section VIII.B.5.b does not explicitly consider Chapter 19 risk results or insights, unless the proposed departure from Tier 2 affects an ex-vessel severe accident design feature identified in the plant-specific DCD. The staff acknowledges that probabilistic risk assessment (PRA) information may be used to quantitatively address the increase in the frequency of occurrence of an accident previously evaluated or the likelihood of a malfunction of a structure, system, or component (SSC) important to safety. However, the exemption would limit the staff's ability to review changes to the risk profile, since Tier 1 SSCs are often risk significant. In addition, the exemption request should have additional detail supporting the statement that the PRA is not impacted.
- The NRC staff noted that SECY 19-0034, "Improving Design Certification Content" (ADAMS Accession No. ML19080A032) may be helpful in the modifying Tier 1 instead of designating Tier 1 as historical information.

At the conclusion of the discussion, 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

Enclosures:
As stated

cc w/encls: See next page

SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR OPERATING COMPANY
ON MARCH 19, 2020 DATED: March 30, 2020

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ADAMS Accession No.: ML20085G031***via e-mail****NRC-001**

OFFICE	PM: NRR/VPO	LA: NRR/VPO	PM: NRR/VPO	BC: NRR/VPO:BC
NAME	JRankin* (c)	RButler*	CSantos*	VHall*
DATE	3/26/2020	3/26/2020	3/26/2020	3/27/2020
OFFICE	PM: NRR/VPO			
NAME	JRankin (s)			
DATE	3/30/2020			

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**AGENDA FOR PUBLIC MEETING
U.S. NUCLEAR REGULATORY COMMISSION (NRC)
Thursday, March 19, 2020
Teleconference
10:00 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>
10:00 a.m.	Opening Remarks	NRC
10:10 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, March 19, 2020
Teleconference
10:00 a.m. – 12:00 p.m.

List of Attendees

Name	Organization
Representing the Nuclear Regulatory Commission	
Jennie Rankin Tanny Santos Vic Hall Mike King Chandu Patel Don Habib Chris Welch	NRR/VPO
Alissa Neuhausen Marie Pohida Stacey Rosenberg Ed Stutzcage Ann Marie Grady	NRR/DRA
Greg Makar Mike Dudek John Honcharik Steve Bloom	NRR/DNRL
Sheila Ray Dinesh Taneja Alexander Tsirigotis Pravin Patel Josh Wilson Joe Colaccino	NRR/DEX
Chang Li Clint Ashley Rebecca Patton Angelo Stubbs Brian Wittick	NRR/DSS
Kerri Kavanagh Paul Prescott	NRR/DRO
Bruce Musico Niry Simonian David Diec	NSIR

Enclosure 2

Representing Industry	
Stephanie Agee* Ted Amundson* Neil Haggerty* Amy Chamberlain* Nick Kellenberger* Mark Humphrey* Kelli Anne Roberts*	Southern Nuclear Operating Company
Public	
Steve Franzone	Florida Power and Light
Zachary Harper	Westinghouse

* = participated via teleconference

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(Revised 3/17/2020)

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