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10 CFR 52.99(c)(1)U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555-0001Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Unit 3  
ITAAC Closure Notification on Completion of ITAAC E.3.9.08.01.03 [Index Number 872]

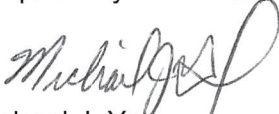
Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item E.3.9.08.01.03 [Index Number 872]. This ITAAC confirmed that an exercise which evaluated offsite exercise objectives for the Vogtle site was completed within the specified time periods of Appendix E to 10 CFR Part 50 (within two biennial calendar years), offsite exercise objectives were met, and there are no uncorrected offsite deficiencies. The closure process for this ITAAC is based on the guidance described in Nuclear Energy Institute (NEI) 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52," which was endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Tom Petrak at 706-848-1575.

Respectfully submitted,

Michael J. Yox  
Regulatory Affairs Director Vogtle 3 & 4Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion of ITAAC E.3.9.08.01.03 [Index Number 872]

MJY/RLB/sfr

**To:**

**Southern Nuclear Operating Company/ Georgia Power Company**

Mr. Peter P. Sena III (w/o enclosures)

Mr. D. L. McKinney (w/o enclosures)

Mr. M. D. Meier (w/o enclosures)

Mr. D. H. Jones (w/o enclosures)

Mr. G. Chick

Mr. M. Page

Mr. P. Martino

Mr. M. J. Yox

Mr. A. S. Parton

Ms. K. A. Roberts

Mr. T. G. Petrak

Mr. C. T. Defnall

Mr. C. E. Morrow

Mr. R. L. Beilke

Mr. S. Leighty

Ms. A. C. Chamberlain

Mr. J. C. Haswell

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**cc:**

**Nuclear Regulatory Commission**

Mr. W. Jones (w/o enclosures)

Mr. C. P. Patel

Mr. G. J. Khouri

Ms. S. E. Temple

Mr. N. D. Karlovich

Mr. A. Lerch

Mr. C. J. Even

Mr. B. J. Kemker

Ms. N. C. Covert

Mr. C. Welch

Mr. J. Gaslevic

Mr. V. Hall

Mr. G. Armstrong

Ms. T. Lamb

Mr. M. Webb

Mr. T. Fredette

Mr. C. Weber

Mr. S. Smith

Mr. C. Santos

Mrs. M. Bailey

Mr. S. Rose

Mr. B. Davis

Mr. J. Vasquez

Mr. J. Eargle

Ms. K. Carrington  
Mr. P. Heher  
Mr. M. King  
Mr. E. Davidson

**Oglethorpe Power Corporation**

Mr. R. B. Brinkman  
Mr. E. Rasmussen

**Municipal Electric Authority of Georgia**

Mr. J. E. Fuller  
Mr. S. M. Jackson

**Dalton Utilities**

Mr. T. Bundros

**Westinghouse Electric Company, LLC**

Dr. L. Oriani (w/o enclosures)  
Mr. D. C. Durham (w/o enclosures)  
Mr. M. M. Corletti  
Mr. Z. S. Harper  
Mr. J. L. Coward

**Other**

Mr. J. E. Hesler, *Bechtel Power Corporation*  
Ms. L. 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*

**Southern Nuclear Operating Company  
ND-20-0488  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion of ITAAC E.3.9.08.01.03 [Index Number 872]**

## **ITAAC Statement**

### **Program Commitment**

8.1 The licensee conducts a partial participation exercise to evaluate portions of emergency response capabilities, which includes participation by each State and local agency within the plume exposure EPZ that have not been tested in a previous exercise. [N.1]

### **Inspections/Tests/Analyses**

8.1 A partial participation exercise (test) will be conducted within the specified time periods of 10 CFR Part 50, Appendix E.

### **Acceptance Criteria**

8.1.3 The exercise is completed within the specified time periods of Appendix E to 10 CFR Part 50, offsite exercise objectives have been met, and there are either no uncorrected offsite deficiencies, or a license condition requires offsite deficiencies to be corrected prior to operation above 5% of rated power.

## **ITAAC Determination Basis**

Multiple ITAAC are performed to ensure that a partial participation exercise is conducted to evaluate portions of emergency response capabilities, which includes participation by each State and local agency within the plume exposure Emergency Planning Zone (EPZ) that have not been tested in a previous exercise. This ITAAC documents the performance of a partial participation exercise (test) to evaluate the offsite portions of emergency response capabilities for the Vogtle site plume exposure EPZ. The partial participation exercise was conducted within the specified time periods of 10 CFR Part 50, Appendix E and confirmed that offsite exercise objectives were met and there were no uncorrected offsite (State and local agency) deficiencies. Offsite deficiencies as used in this ITAAC are considered to be Level 1 Findings, as defined in the Federal Emergency Management Agency's (FEMA's) January 2016 Program Manual – Radiological Emergency Preparedness (FEMA P-1028) (Reference 1), and as addressed in FEMA's May 15, 2015, Memorandum, entitled "New Terms to Classify REPP Exercise-Related Observations and Issues" (Reference 2). Additionally, NRC Regulatory Issue Summary 2006-03 (Reference 3) provides a basis for using biennial calendar years when determining the exercise requirement time periods specified in 10 CFR Part 50, Appendix E.

A Radiological Emergency Preparedness (REP) exercise was performed at Vogtle Units 1&2 on May 15, 2018. The exercise date falls within the exercise requirement time period specified in 10 CFR Part 50, Appendix E for Vogtle Unit 3. The exercise involved a simulated plume exposure pathway release in the EPZ for Vogtle Units 1&2. The Vogtle site plume exposure EPZ is identical for Vogtle Units 1 through 4.

The offsite core capabilities demonstrated during the exercise included:

- Operational Coordination
- Operational Communication
- Situational Assessment
- Public Information and Warning
- Environmental Response/Health and Safety

- On-Scene Security, Protection, and Law Enforcement
- Mass Care Services

Demonstration of these offsite capabilities by the Offsite Response Organizations (OROs) is consistent with recent FEMA evaluated exercises held at Vogtle Units 1&2, and are representative of FEMA's Response Mission Area core capabilities associated with radiological emergencies.

Successful demonstration of the above core capabilities met the ORO objectives for the exercise which were to:

- Demonstrate the ability to provide direction and control and make protective action decisions through the state emergency operations centers, county emergency operations centers, and field activities by exercise play and discussion of plans and procedures.
- Demonstrate the ability to provide protective action decisions affecting state and county emergency workers and public through exercise play and discussions of plans and procedures.
- Demonstrate the ability to provide protective actions for state and county emergency workers and public through exercise demonstration.
- Demonstrate the ability to activate the prompt alert and notification system utilizing the primary notification system and the emergency alert system through exercise play.
- Demonstrate the effectiveness of plans, policies, and procedures in the joint information center for public and private sector emergency information communications.
- Demonstrate the ability to monitor, decontaminate, register, and shelter evacuees.
- Demonstrate the ability to provide dose projection and protective action decision making for the plume phase.

The offsite exercise objectives and core capabilities demonstrated during the Vogtle Unit 1&2 May 2018 exercise are documented in section 2.2 of the Federal Emergency Management Agency's (FEMA's) Final After Action Report for the Vogtle Unit 1&2 2018 REP Exercise (Reference 4). Reference 4 confirmed that offsite objectives were met and that no Level 1 or Level 2 findings were identified during the Vogtle Unit 1&2 exercise.

The above objectives meet REP Program requirements and encompass the required offsite emergency preparedness evaluation areas for the Vogtle Unit 3 ITAAC E.3.9.08.01.03, namely, appropriate offsite authorities actively took part in the exercise sufficient to test direction and control functions; i.e., (a) protective action decision making related to emergency action levels, and (b) communication capabilities among affected State and local authorities and the licensee.

Successful demonstration of the Vogtle Units 1&2 ORO capabilities in 2018 remains valid for Vogtle Unit 3 as Vogtle Unit 3 shares the following with Vogtle Units 1&2:

- Owner Controlled Area
- Offsite Response Organizations and Agencies
- Offsite communication and notification procedures
- Dose assessment procedure and associated software
- Emergency Operations Center
- Joint Information Center
- Protective Action Recommendation (PAR) procedure

Although there are differences between the Vogtle Unit 3 and Vogtle Units 1&2 Emergency Action Level (EAL) initiating conditions, and resulting emergency classification assessments, the resulting PARs that would be made by Vogtle Unit 3 are based on the same initial and follow-up PAR flowcharts that Vogtle Units 1&2 utilize to make PARs (Reference 5). The initial PAR flowchart is based solely on the declaration of a General Emergency. The follow-up PAR flowchart utilizes offsite dose assessment comparisons to the Environmental Protection Agency Protective Action Guidelines, and containment barrier integrity challenges with a significant source term in containment, to make revisions to an initial PAR. Evacuation impediment criteria contained in the initial and follow-up PAR flowcharts is common to Vogtle Units 1, 2 and 3. Use of the same initial and follow-up PAR flowcharts by Vogtle Units 1, 2 and 3 result in consistent PARs being made to the OROs, using consistent PAR terminology, regardless of whether the event occurred at Vogtle Unit 3 or Vogtle Units 1&2.

Memorandums of Understanding (MOUs) are established between the Vogtle site and the OROs. The MOUs ensure a consistent understanding of ORO responsibilities between the Vogtle site and each ORO, as well as a consistent ORO response to a radiological emergency occurring at the Vogtle site. The MOUs are written to represent the entire Vogtle site and do not distinguish between Vogtle Units 1&2 and Vogtle Unit 3.

Lastly, the Vogtle site schedules quarterly meetings with the local and state OROs. Eight quarterly meetings have been held since the May 2018 FEMA evaluated exercise. The meetings exchange information associated with ORO radiological emergency response facility and equipment upgrades, changes in ORO personnel, ORO emergency plan revisions, drills and exercises, ORO training requests and Vogtle emergency preparedness changes associated with ORO response. During the February 2020 ORO meeting Vogtle Unit 3&4 EAL training was provided to emergency management personnel from the States Georgia and South Carolina; Barnwell, Allendale, Burke, and Aiken counties, Savannah River Site, and FEMA (Reference 6).

References 1, 2, and 4 through 6 are available for NRC inspection as part of the Unit 3 ITAAC E.3.9.08.01.03 Completion Package (Reference 7).

### **ITAAC Finding Review**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC E.3.9.08.01.03 (Reference 7) and is available for NRC review.

### **ITAAC Completion Statement**

Based on the above information, SNC hereby notifies the NRC that ITAAC E.3.9.08.01.03 was performed for VEGP Unit 3 based on the information provided in Reference 4 and that the prescribed acceptance criteria were met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

**References (available for NRC inspection)**

1. January 2016 Program Manual – Radiological Emergency Preparedness (FEMA P-1028), FEMA
2. May 15, 2015, Memorandum, New Terms to Classify REPP Exercise-Related Observations and Issues, Andrew Mitchell, Director, Technological Hazards Division, FEMA
3. NRC Regulatory Issue Summary 2006-03, Guidance on Requesting an Exemption from Biennial Emergency Preparedness Exercise Requirements, February 24, 2006
4. Final After Action Report, Vogtle Electric Generating Plant Radiological Emergency Preparedness Exercise, Exercise Date May 15, 2018, FEMA, August 2, 2018
5. NMP-EP-144, Protective Actions, Version 5.0
6. Vogtle 3&4 Emergency Preparedness Off-Site Training Attendance Sheet, 2/5/2020
7. E.3.9.08.01.03-U3-CP-Rev0, ITAAC Completion Package