



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

August 13, 2020

LICENSEE: Southern Nuclear Operating Company, Inc.

FACILITY: Joseph M. Farley Nuclear Plant, Units 1 and 2; Edwin I. Hatch Nuclear Plant, Units 1 and 2; Vogtle Electric Generating Plant, Units 1, 2, 3, and 4

SUBJECT: SUMMARY OF JULY 30, 2020, PUBLIC MEETING WITH SOUTHERN NUCLEAR OPERATING COMPANY, INC., REGARDING A LICENSE AMENDMENT REQUEST FOR THE EMERGENCY PLAN FOR JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2; EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2; AND VOGTLE ELECTRIC GENERATING PLANT, UNITS 1, 2, 3, AND 4 (EPID NOS. L-2020-LLA-0150 AND L-2020-LLA-0151)

On July 30, 2020, a Category 1 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Southern Nuclear Operating Company, Inc. (SNC, the licensee) via Skype. The purpose of the meeting was to clarify the NRC letter to SNC, dated July 23, 2020 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML20202A017).

By letter dated June 30, 2020 (ADAMS Accession No. ML20192A140), SNC submitted an emergency plan (EP) license amendment request (LAR) for Joseph M. Farley Nuclear Plant, Units 1 and 2; Edwin I. Hatch Nuclear Plant, Units 1 and 2; and Vogtle Electric Generating Plant, Units 1, 2, 3, and 4 (SNC Fleet).

The proposed LAR would revise the SNC Standard Emergency Plan, including the Site Annexes, to change the emergency response organization (ERO) staffing composition, and extend staff augmentation times from 75 to 90 minutes.

By letter dated July 23, 2020, and supporting conference call held on July 23, 2020, the NRC staff determined that the LAR did not provide technical information in sufficient detail for the NRC staff to complete its review and make an independent assessment regarding acceptability. The subject letter and clarification call informed the licensee was needed for the submittal to be acceptable and, the licensee an opportunity to supplement its docketed submittal. Specifically, the NRC staff identified that the NRC staff needs an analysis that can be used by the NRC staff to assess the impact of the proposed changes on the relief and support functions offered by the augmenting ERO staff to implement the EP effectively. The NRC staff stated that the supplemental information needs to be sufficiently detailed to provide justification for extension of ERO response times and proposed changes to ERO on-shift and augmentation staffing.

A list of attendees is provided as an Enclosure.

On July 27, 2020 (ADAMS Accession No. ML20209A004), the meeting was noticed on the NRC public webpage.

The SNC slide presentation can be found in ADAMS Accession No. ML20217L431.

Discussion

SNC presented its slide/talking points. SNC explained the formatting they plan to use in the supplement: (1) SNC response – general, (2) supplemental information on the advantages of the SNC staffing scheme, (3) supplemental information on the staffing analysis process, (4) supplemental information on enhancements, and (5) supplemental information on relief and support functions offered by augmenting staff. SNC also showed a table format that SNC plans to use.

The NRC staff explained that the NRC staff would not be consulting during the meeting and would not be making any regulatory decisions.

The SNC identified the following precedents in its LAR:

- Diablo Canyon (ADAMS Accession No. ML19196A309),
- Sequoyah (ADAMS Accession No. ML18159A461),
- South Texas (ADAMS Accession No. ML18159A212),
- Prairie Island (ADAMS Accession No. ML17362A202),
- Monticello (ADAMS Accession No. ML17349A916),
- Duane Arnold (ADAMS Accession No. ML17220A026),
- Point Beach (ADAMS Accession No. ML16118A154),
- Watts Bar (ADAMS Accession No. ML041810056),
- River Bend (ADAMS Accession No. ML012710218),
- Fermi (ADAMS Accession No. ML102700478), and
- Susquehanna (ADAMS Accession No. ML030830543).

In addition, the SNC LAR cited Regulatory Issue Summary (RIS) 2016-10, "License Amendment Requests for Changes to Emergency Response Organization Staffing and Augmentation" (ADAMS Accession No. ML16124A002), which informed licensees of the application of guidance documents to support LARs that change augmenting ERO arrival times. It stated, in part, that:

The NRC staff has recently received multiple LARs that seek to change ERO staffing commitments by extending the augmentation time for certain positions or eliminating the staffing for positions entirely. In each case, the change has been justified primarily by referencing the on-shift staffing analysis developed in accordance with NEI [Nuclear Energy Institute] 10-05, ["Assessment of On-Shift Emergency Response Organization Staffing and Capabilities,"] or a similar analysis using different accident scenarios.

RIS 2016-10 further stated:

NEI 10-05 does not consider the capabilities offered by the augmenting ERO staff to relieve and support on-shift staffing for the purposes of providing justification for extension of ERO response times.

However, an evaluation performed using only the guidance of NEI 10-05 does not satisfy the requirement to identify and evaluate changes to ERO

augmentation timing or ERO augmentation staffing that reduces the capability to perform an emergency planning function. Following the guidance from RG 1.219 ["Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors"], LARs that seek approval for changes to on-shift staffing and the augmenting ERO (e.g., staffing levels, response timing) should identify each change and evaluate them individually.

The NRC staff clarified the use of procedure and informational technology advancements for justifying the extension in augmentation times, as well as the use of recent precedence of approvals for similar emergency plan changes.

In LIC-109, Revision 3, "Acceptance Review Procedures for Licensing Basis Changes" (ADAMS Accession No. ML20036C829), it states:

During the conference call, the NRC staff will identify the omitted or insufficient information to the licensee, discuss the appropriate course of action, and establish the specific date the information will be submitted. It is important that the conference call result in a clear communication to the licensee of the information needed and that the NRC staff gain an understanding of whether the licensee plans to submit the information within the NRC staff's deadline established during the call (no more than 13 working days). However, the licensee does not need to agree with the need for the information or the deadline.

SNC requested to provide the supplemental information within 13 working days from July 23, 2020. This would be August 11, 2020. The NRC staff agreed that SNC can provide the supplemental information on August 11, 2020.

Public Questions to NRC

There were 14 members of the public in attendance. One member of the public asked about the functional analysis. The NRC staff responded that the functional analysis provided by SNC is also referred to as a procedure-based performance analysis (PBPA). The NRC staff further provided that the PBPA addressed procedural tasks that would be performed by the on-shift staff and did not identify any tasks that would be provided by the augmenting ERO. As such, the NRC staff could not use this PBPA, and does not justify changes to the augmenting ERO organization.

Closing

SNC plans to submit the proposed supplemental information by August 11, 2020. Once received, the NRC staff will perform a thorough review of the proposed supplement and make any regulatory decisions in writing in a timely manner.

The NRC staff made no regulatory decisions during the meeting.

Public Meeting Feedback forms were available, but no comments were received.

The meeting adjourned at 11:42 am (Eastern Daylight time).

Please direct any inquiries to me at 301-415-3100.

/RA

John G. Lamb, Senior Project Manager
Plant Licensing Branch, II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-321, 50-366, 50-348, 50-364,
50-424, 50-425, 52-025, and 50-026

Enclosure: List of Attendees

cc
Listserv

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DISTRIBUTION:

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RidsAcrcAcnw_MailCTR Resource	RidsRgn2MailCenter Resource	RHoffman, NSIR
RidsNrrDorLPl2-1 Resource	SAnderson, NRR	CSantos, VPO
RidsNrrPMHatch Resource	MMarkley, NRR	EDavidson, VPO
RidsNrrPMRegion 2 Resource		CSafouri, Region 2
RidsNrrPMVogtle Resource	JHickman, Region	

ADAMS Accession No. PKG ML20217L458

Meeting Notice ML20209A004

Meeting Summary ML20217L369

Meeting SlidesML2020217L431

OFFICE	DORL/LPL2-1/PM	DORL/LPL2-1/LA	DORL/LPL2-1/BC	DORL/LPL2-1/PM
NAME	JLamb	KGoldstein	MMarkley	JLamb
DATE	7/30/2020	08/11/2020	8/13/2020	8/13/2020

OFFICIAL RECORD COPY

LIST OF ATTENDEES

JULY 30, 2020, PUBLIC MEETING WITH SOUTHERN NUCLEAR COMPANY
REGARDING EMERGENCY PLAN LICENSE AMENDMENT REQUEST FOR
JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2;
EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2;
VOGTLE EECTRIC GENERATING PLANT, UNITS 1 AND 2; AND
VOGTLE EECTRIC GENERATING PLANT, UNITS 3 AND 4

<u>ATTENDEE</u>	<u>REPRESENTING</u>
John G. Lamb	NRC
Mike Markley	NRC
Joe Anderson	NRC
Mike Norris	NRC
Ray Hoffman	NRC
Edward Robinson	NRC
Don Johnson	NRC
John Pelchat	NRC
Edwin Lea	NRC
Joel Munday	NRC
Roger Hannah	NRC
Ryan Joyce	SNC
Ken Lowery	SNC
Cheryl Gayheart	SNC
Jamie Coleman	SNC
Ernest Bates	SNC
Ricky Collings	SNC
Shannon Smelley	SNC
Justin Wheat	SNC
Amy Chamberlain	SNC
Stephanie Agee	SNC
Jason Weathersby	SNC
Barty Simonton	State of Georgia
Sean Hayes	State of Georgia
Anuradha Nair	State of South Carolina
David Thachik	State of South Carolina
Danilyn Bock	State of South Carolina
Michael Spradlin	State of South Carolina
Kevin Hicks	State of Alabama
Brian Hastings	State of Alabama
Quinton Dailey	State of Alabama
Monica Ray	Energy Compliance Consultants
John Tyndall	Energy Compliance Consultants
R. Brown	Energy Compliance Consultants
Eric White	Duke Energy
Neil Turner	Dominion Energy

Enclosure