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**Sent:** Friday, October 16, 2020 1:15 PM  
**To:** Vogtle PEmails  
**Subject:** FW: Presentation Material for 10/22 Public Call  
**Attachments:** Presentation for VEGP 3 and 4 Public Meeting on RG 1.219 Guidance for EP Change.pdf

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**From:** Leighty, Steven <sleighty@southernco.COM>  
**Sent:** Friday, October 16, 2020 12:23 PM  
**To:** Santos, Cayetano <Cayetano.Santos@nrc.gov>  
**Cc:** Roberts, Kelli Anne <KROBERTS@southernco.com>  
**Subject:** [External\_Sender] Presentation Material for 10/22 Public Call

Tanny,

Please find attached the presentation material for the discussion during the public call next week on RG 1.219 and a pending change for VEGP 3&4 non-licensed operator staffing.

If you have any questions, please let me know.

Thanks,

**Steve Leighty | Southern Nuclear**

Licensing Supervisor | Vogtle 3&4

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# Reg. Guide 1.219 Guidance on EP Staffing Changes & VEGP 3&4 System Operators

**October 22, 2020**

# Background

- **Feb 2012 – Originally Licensed with VEGP 3&4 Emergency Plan Rev. 0 requiring 5 SOs for single unit and 7 SOs for dual unit Operations.**
- **Aug 2015 – Application for SNC Standard Emergency Plan with respective plant-specific annexes (Amendments 74/73 – Mar 2017) requires 6 SOs for single unit and 8 SOs for dual unit Operations.**
- **May 2016 – NEI 10-05 Analysis submitted to NRC, satisfying License Condition 2.D(12)(d). Analysis lists 8 SOs as available, but never employs more than 6 SOs for dual unit operations.**
- **Current Eplan Annex (Rev. 3) requires 8 SOs for dual unit operation.**



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# VEGP 3&4 Annex Change

- **Reduce the number of SOs (non-licensed operators) listed in Table 2.2.A of SNC's Standard Emergency Plan Annex for VEGP 3&4 from 8 SOs to 6 SOs for dual unit operation**
- **Table 2.2.A was based on planned Operator Staffing, not EP functions. No consideration was given to the AP1000 passive design, which requires few operator actions and NO safe shutdown actions for SOs (i.e., conservative operating philosophy).**
- **Change planned to be done under 50.54(q) following the guidance found in RG 1.219**



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# RG 1.219 “Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors”

- **Section 1.6a. states the following:**

*The licensee cannot properly evaluate a proposed change to the emergency plan if it has not considered the basis for the staff’s approval of the original plan or the basis for any subsequent change, whether it has been approved by the staff or put into place by the licensee under 10 CFR 50.54(q). For example, why did the licensee specify more onshift ERO staff than what was called for in NUREG-0654? **Was it a matter of exceeding the regulatory minimum as an operating philosophy**, or was it done to compensate for special circumstances that existed when the decision was made (e.g., lengthy ERO augmentation times because of the remoteness of the site)? A decrease in staffing in the first case might not reduce effectiveness; a decrease in staffing in the second case would reduce effectiveness if the special circumstances still existed.*



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## RG 1.219 (Continued)

And

- Section 1.8b.(1) states the following:

*If the licensee's original commitment resulted from a **conservative operating philosophy**, the licensee may be able to show that the reduction in commitment would not reduce the effectiveness of its emergency plan.*

- Therefore, RG 1.219 provides for changes to onshift ERO staffing via 10 CFR 50.54(q) without prior NRC approval.



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# RG 1.219 and 10 CFR 50.47(b)(2)

- **Section 4.2 of RG 1.219 covers the applicable planning standard 10 CFR 50.47(b)(2) Onsite Emergency Organization**
- **There are 6 examples listed that could require prior NRC approval (4.2c.), and this change doesn't cross any of these thresholds**
  - 1) **The change results in no major functional areas or major tasks identified in the E-Plan being unassigned.**
  - 2) **The change doesn't increase ERO augmentation time.**
  - 3) **The change does not eliminate any key positions. SOs are not key positions per Section 2 of RG 1.219.**





## Section 4.2 of RG 1.219 (Continued)

- 4) The change doesn't omit accident sequences included in the NEI 10-05 Analysis.
- 5) The change doesn't have an impact on corporate support resources.
- 6) The change doesn't result in a reduction in personnel relied upon in the E-Plan.
- The reduction in SO Staffing does not rise to the level of the examples that could require NRC approval.



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# SNC LAR NL-19-0226 Impact

- **Fleet LAR, submitted 06-30-2020, requesting changes to ERO staffing and augmentation times.**
- **LAR may require Repair and Corrective Action function from SOs**
- **The Performance-Based Procedure Analysis (PBPA) performed for this LAR never employs more than 6 SOs for dual unit operation.**



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## SNC LAR NL-19-0226 Impact (Continued)

- **VEGP 3 & 4 is positioned to accept Repair and Corrective Action for SOs, since the passive design requires little action from SOs**
- **VEGP 3&4 NEI 10-05 Staffing Analysis, DRAFT Rev. 4, demonstrates that 5 SOs can perform all actions for the analyzed scenarios in dual unit operation.**
- **Therefore, if needed, VEGP 3 & 4 could potentially dedicate an SO for the Repair and Corrective Action function.**



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# Conclusion

- **This change is not considered a reduction in effectiveness, and can be completed without prior NRC approval, under 10 CFR 50.54(q) for the following reasons:**
  - The inclusion of 8 SOs in the VEGP 3&4 E-Plan staffing table was based on a conservative operating philosophy. The AP1000 passive design requires little operator action, including no safe shutdown actions for SOs.
  - The reduction to 6 SOs does not meet the type of examples in RG 1.219 that could require prior NRC approval, and is consistent with the guidance in Sections 1.6 and 1.8.
  - The change is also supported by VEGP 3&4 staffing analyses.
- **No impact to fleet LAR NL-19-0226, as the SOs being removed do not have any EP function, nor are they relied upon in the LAR.**



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