



# Vogtle Fixed 8-Hour Emergency Light Deviation Pre-Submittal Meeting

February 2021





## Meeting Purpose and Agenda

- The purpose of this meeting is to discuss proposed amendment request to approve a deviation from Branch Technical Position (BTP) Chemical Engineering Branch (CMEB) 9.5-1 guidance section C.5.g(1) to not require 8-hour fixed emergency lighting in all areas of the plant required for safe shutdown
- This meeting will cover the following topics
  - Review of the emergency lighting requirements for post fire safe shutdown, SBO, and FLEX implementation
  - Proposed License Amendment Request



# Review of Emergency Light Guidance for Post-Fire Safe Shutdown, Station Blackout, and FLEX Implementation



## Background

- VEGP credits 8 hour fixed emergency lights to provide illumination for performing safe shutdown operator actions within the plant
- Currently VEGP complies with the guidance in BTP CMEB 9.5-1 with an approved deviation for control room lighting and outdoor lighting
- VEGP also complies with BTP CMEB 9.5-1 Section C.5.g(2) that requires sealed beam portable lights are provided for use by the fire brigade and other operations personnel
- VEGP did credit the emergency lights installed per the BTP guidance for responding to a station blackout.
- The VEGP FLEX plan mentions but does not rely exclusively on the lighting installed per the BTP



## Guidance

- BTP CMEB 9.5-1 guidance has a requirement for 8-hour fixed emergency lights in all areas required for operator actions for safe shutdown as well as ingress/egress routes and areas required for safe shutdown when the control room has been abandoned.
- While VEGP credited the 8-hour fixed emergency lights for SBO response, There are no explicit requirements in 10 CFR 50.63, RG 1.155, or NUMARC 87-00 for 8-hour fixed emergency lights.
- The VEGP FLEX plan is in accordance with NEI 12-06. This guidance explicitly states that portable lighting is acceptable for use and there is no requirement for 8-hour fixed emergency lights



# **Proposed License Amendment Request**



## Proposed License Amendment Request

- SNC proposes to deviate from the guidance in BTP CMEB 9.5-1 Section C.5.g(1) to allow the use of portable lighting for operator safe shutdown actions
- Existing emergency (safe shutdown) lights would be re-classified as life safety lights with a 1-½ hour requirement
- Based on the guidance for SBO and FLEX, changes to those programs resulting from this change will be addressed within existing processes
- Basis for change: Use of portable lights in conjunction with the existing (life safety) lights with a 1-½ hour requirement is not adverse to the ability to achieve and maintain safe shutdown in the event of a fire



## **BTP CMEB 9.5-1 Section C.5.g (1)**

- (1) Fixed self-contained lighting consisting of fluorescent or sealed-beam units with individual 8-hour minimum battery power supplies should be provided in areas that must be manned for safe shutdown and for access and egress routes to and from all fire areas. Safe shutdown areas include those required to be manned if the control room must be evacuated
- LAR will discuss VEGP ability to achieve and maintain safe shutdown with portable lights supplemented by existing emergency (life safety) lights rated at 1-½ hours
  - LAR will discuss the required safe shutdown action times versus the time required to perform such actions to demonstrate adequate margin exists with portable lighting supplemented by 1-½ hour lighting
  - LAR will discuss lighting at the remote shutdown panels used when the control room must be evacuated





**Questions?**