



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

February 5, 2021

LICENSEE: Southern Nuclear Operating Company, Inc.

FACILITY: Vogtle Electric Generating Plant, Units 1 and 2

SUBJECT: SUMMARY OF FEBRUARY 1, 2021, PUBLIC MEETING WITH SOUTHERN NUCLEAR OPERATING COMPANY, INC., REGARDING A PROPOSED LICENSE AMENDMENT REQUEST TO CHANGE THE 8-HOUR FIXED EMERGENCY LIGHTING FOR SAFE SHUTDOWN FOR VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2 (EPID L-2021-LRM-0004)

On February 1, 2021, 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). The purpose of the meeting was for SNC to describe its plan to submit a license amendment request (LAR) to change the 8-hour fixed emergency lighting for safe shutdown for Vogtle Electric Generating Plant (Vogtle), Units 1 and 2.

A list of attendees is provided as an Enclosure.

On January 8, 2021 (Agencywide Document and Access Management System (ADAMS) Accession No. ML21008A020), the meeting was noticed on the NRC public webpage.

The SNC presented slides contained in ADAMS Accession No. ML21027A206.

Introduction

The NRC staff opened the meeting with introductory remarks and introduction of the attendees.

The SNC staff discussed the following topics: (1) background information on the emergency lighting function, and (2) the proposed LAR.

Background

The Vogtle, Unit 1, Renewed Facility Operating License (RFOL) NPF-68 (ADAMS Accession No. ML052840233), has License Condition 2.G that states:

Southern Nuclear shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility, and submittals dated July 2, August 4 and 13, October 10 and 24, November 5, and December 19, 1986, and January 2, 1987, as approved in the SER (NUREG-1137) through Supplement 5 subject to the following provision:

Southern Nuclear may make changes to the approved fire protection program without prior approval of the Commission, only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

The Vogtle, Unit 2, RFOL NPF-81 (ADAMS Accession No. ML052840236) has License Condition 2.G that states:

Southern Nuclear shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility, as approved in the SER (NUREG-1137) through Supplement 9 subject to the following provision:

Southern Nuclear may make changes to the approved fire protection program without prior approval of the Commission, only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

The NUREG-1137 is "Safety Evaluation Report related to the operation of Vogtle Electric Generating Plant, Units 1 and 2" (ADAMS Accession No. ML091330626). NUREG-1137, Supplements 1 through 5 are contained in ADAMS Accession Nos. ML091330550, ML091330549, ML091330548, ML091330547, and ML091330546, respectively.

The NUREG-1137 references Branch Technical Position (BTP) Chemical Engineering Branch (CMEB) 9.5.1, "Fire Protection Program," as part of NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR [Light-Water Reactor] Edition."

The BTP CMEB 9.5-1 C.5.g(1) states:

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.

SNC stated that Vogtle credits 8-hour fixed emergency lights to provide illumination for performing safe shutdown operator actions within the plant. SNC said that Vogtle did credit the emergency lights installed per the BTP guidance for responding to a station blackout (SBO). SNC also stated that the Vogtle FLEX plan mentions the 8-hour fixed emergency lights, but the Vogtle FLEX plan does not rely exclusively on the lighting installed per the BTP.

Proposed LAR

SNC stated that it 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. SNC said that the existing 8-hour emergency lights for safe shutdown would be re-classified as life-safety lights with a 1.5-hour requirement. SNC stated that the proposed LAR is to change to portable lighting and to re-classify the 8-hour fixed emergency lights to 1.5-hour life-safety lights, and this proposed change will be addressed for SBO and FLEX based on existing guidance within existing processes. SNC said that the reason for the proposed change is to use portable lights in conjunction with the 1.5-hour life-safety lights, and SNC believes the proposed change will not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire at Vogtle.

SNC said that the proposed 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 the 1.5-hour life-safety lights. SNC stated that the proposed LAR will discuss lighting at the remote shutdown panels used when the control room must be evacuated at Vogtle.

NRC Questions to SNC

The NRC staff questioned the reason SNC is proposing to change from the 8-hour fixed emergency lighting to portable lighting. SNC stated that there are reliability issues with the 8-hour fixed emergency lighting. The NRC asked what is considered portable lighting. SNC said that portable lighting are flashlights or head lamps attached to a hard hat. The NRC staff asked about a program for the distribution and maintenance of the portable lighting. SNC said that it is being worked and the information would be contained in the proposed LAR. The NRC staff questioned the number and timing of the SNC operator actions to perform safe shutdown activities. SNC stated that operator actions would be included in the proposed LAR. The NRC staff questioned how SNC would address the proposed change regarding SBO. SNC said that it would perform the change related to SBO in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR), 50.59, "Changes, tests, and experiments."

The last bullet on slide 7 stated the following:

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.

The Vogtle, Units 1 and 2, RFOL NPF-68 and NPF-81 have License Condition 2.G stated above.

The NRC staff asked that, if the proposed LAR would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire as stated in the last bullet on page 7, then why is SNC proposing to submit a LAR. The NRC staff also asked why is SNC proposing to submit a LAR if the Vogtle Fire Protection License Condition allows SNC to make changes to the approved fire protection program without prior approval of the Commission, only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire. The NRC staff noted that there is an inconsistency between the last bullet on slide 7 and the Vogtle Fire Protection License Condition. SNC stated it discussed this specific issue and did not reach a definitive conclusion.

Public Questions to NRC

There were no members of the public in attendance.

Closing

The NRC staff made no regulatory decisions during the meeting.

Once received, the NRC staff will perform a thorough review of the proposed LAR and make any regulatory decisions in writing in a timely manner.

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

The meeting adjourned at 3:11 pm (Eastern 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. 50-424 and 50-425

Enclosure: List of Attendees

cc w/encls: Distribution via Listserv

LIST OF ATTENDEES
FEBRUARY 1, 2021, PUBLIC MEETING WITH SOUTHERN NUCLEAR COMPANY
REGARDING CHANGE TO 8-HOUR FIXED EMERGENCY LIGHTING
FOR SAFE SHUTDOWN
VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2

<u>ATTENDEE</u>	<u>REPRESENTING</u>
John G. Lamb	NRC
Mike Markley	NRC
Jay Robinson	NRC
Jon Montgomery	NRC
Scott Shaeffer	NRC
Shilp Vasavada	NRC
Larry Jones	NRC
Jon Montgomery	NRC
Ken Lowery	SNC
Chris Gamblin	SNC
Tanya McCarthy	SNC
Jamie Coleman	SNC
Len Casella	SNC
Austin Peterson	SNC
Jeff Deal	SNC
Mariam Whitby	SNC
Matt Walters	SNC
Al Sweat	SNC
Kevin Walden	SNC
Vincent Rubano	Jensen Hughes
Andy Ratchford	Jensen Hughes
Liz Kleinsorg	Jensen Hughes

Enclosure

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ADAMS Accession Nos.:

ML21033A607 (Meeting Package)

ML21008A020 (Meeting Notice)

ML21027A206 (Meeting Slides)

ML21033A532 (Meeting Summary)

OFFICE	DORL/LPL2-1/PM	DORL/LPL2-1/LA	DRA/APLC/BC	DORL/LPL2-1/BC	DORL/LPL2-1/PM
NAME	JLamb	KGoldstein	SVasavada	MMarkley	JLamb
DATE	2/1/2021	2/2/2021	2/3/2021	2/4/2021	2/5/2021

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