



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

April 8, 2021

LICENSEE: Southern Nuclear Operating Company, Inc.

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

SUBJECT: SUMMARY OF MARCH 31, 2021, PUBLIC MEETING WITH SOUTHERN
NUCLEAR OPERATING COMPANY, INC., REGARDING A PROPOSED
LICENSING ACTION REQUEST TO CHANGE THE TECHNICAL
SPECIFICATION RELATED TO HEAT FLUX HOT CHANNEL FACTOR FOR
JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2, AND VOGTLE
ELECTRIC GENERATING PLANT, UNITS 1 AND 2
(EPID NO. L-2021-LRM-0028)

On March 31, 2021, an Observation Public Meeting, formerly known as 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 Quality Assurance Topical Report (QATR) in accordance with the requirements of Title 10, "Energy," of the *Code of Federal Regulations* (10 CFR), Section 50.54(a)(4) for Edwin I. Hatch Nuclear Plant, Units 1 and 2; Joseph M. Farley Nuclear Plant, Units 1 and 2; and Vogtle Electric Generating Plant, Units 1 and 2 (SNC Fleet). SNC proposed to submit a licensing request to expand the allowances for performing fully remote vendor audits during times of extenuating circumstances (e.g., pandemics) in SNC's QATR section 18.1.

A list of attendees is provided as an Enclosure.

On February 25, 2021 (Agencywide Document and Access Management System (ADAMS) Accession No. ML21056A330), the meeting was noticed on the NRC public webpage. On March 25, 2021, the meeting category was changed from Category 1 to Observation (ADAMS Accession No. ML21084A079).

The SNC presented slides contained in ADAMS Accession No. ML21083A287.

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, and (2) the proposed LAR.

Background

SNC stated that vendor audits are to be completed on a 36-month frequency, and most utilities have adopted an NRC-approved Safety Evaluation Report (SER) that allows for a 25-percent (i.e., 9 months) grace period to complete an audit beyond the 36-month period. SNC said that most vendor audits are coordinated through Nuclear Procurement Issues Corporation (NUPIC) and adhere to NUPIC and Electric Power Research Institute (EPRI) guidance, utilizing a performance-based approach. SNC stated that (1) the performance-based auditing involves direct observation at the vendor facility, and (2) the common interpretation of 10 CFR 50, Appendix B Criterion VII, is that supplier audits must be conducted at the vendor facility.

SNC stated that the current SNC Quality Assurance Topical Report (QATR) requirements states, in part, the following:

Supplier's technical and quality capability as determined by a direct evaluation of his facilities and personnel and the implementation of his quality assurance program.

SNC said that COVID-19-related travel restrictions, both domestic and international, are precluding the ability of SNC station quality assurance (QA) personnel from conducting audits of vendors required by Criteria VII and XVIII of Appendix B and utility QA plans. SNC stated that personnel travel is challenged across state and international lines. SNC representatives also stated that some suppliers are restricting access to their facility.

Proposed Licensing Action

SNC stated that the proposed licensing request to change the SNC Fleet QATR will adopt the EPRI document 3002020796, titled "Use of Remote Assessment Techniques: Planning and Conducting Audits and Surveys Utilizing Remote Techniques During Exigent Conditions." SNC said that the EPRI document is applicable to the SNC Fleet. SNC noted that the proposed change is considered a reduction in commitments. SNC said that the proposed change will provide additional flexibility for SNC to perform vendor assessments using one of the following techniques:

- Provisional remote assessments, where all assessors are located remotely, can be used in cases where on-site in person presence is necessary, but is not possible due to exigent conditions. The results of a provisional remote assessment are evaluated to determine if approval of the assessed organization can be provisionally renewed with appropriate restrictions applied to each order during the provisional approval period.
- Fully remote assessments, where all assessors are remote, can be used in limited cases when on-site presence is not necessary, such as when the supplier does not have a production facility.

SNC stated that the proposed SNC QATR changes would be the following:

- (1) Pandemic and Exigent Conditions: In the case of Pandemic or exigent Conditions, SNC plans to adopt EPRI Document – 3002020796 – Use of Remote Assessment Techniques: Planning and Conducting Audits and

Surveys Utilizing Remote Techniques During Exigent Conditions, to be used to assess suppliers Quality Assurance programs.

- (2) Southern Nuclear meets the requirements of Regulatory Guide (RG) 1.28 for Construction Activities conducted by Southern Nuclear, except that [American Society of Mechanical Engineers] ASME NQA-1-1994 edition (as modified by the exceptions to NQA-1-1994 as shown in this QATR) will be used in place of [American National Standards Institute] ANSI/ASME NQA-1-1983 and the ANSI/ASME NQA-1a-1983 Addenda. Within Regulatory Guide 1.28, the terms "direct evaluation" and "audit" may be satisfied using remote assessment techniques in pandemic or exigent conditions.

SNC discussed the proposed hybrid audit method. SNC stated that the EPRI 3002020796 also contains guidance for the conduct of hybrid assessments. SNC said the hybrid method has been determined by SNC not to conflict with 10 CFR, Appendix B to Part 50, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants." In addition, SNC stated that the hybrid method has been determined by SNC not to reduce the SNC QATR commitments. SNC said that no explicit SNC QATR changes are proposed to address use of the hybrid assessment approach. SNC stated that it plans to transmit the entire EPRI document with its licensing action request. SNC said that only the portions of the EPRI document, related to fully remote and provisional remote assessment methods during exigent circumstances, are being adopted into the SNC QATR. SNC stated that the proposed changes to the SNC QATR will be submitted to the NRC staff for review and approval.

SNC said that the proposed SNC QATR change will be submitted under 10 CFR 50.54(a)(4). SNC stated that the cover letter to the proposed licensing action will address anticipated use by multiple utilities and suppliers. SNC said that the proposed licensing action will contain (1) the description and justification for change, (2) a markup of SNC QATR page, (3) clean-typed SNC QATR page, and (4) EPRI Technical Report 3002020796.

SNC stated that it expects the EPRI Technical Report 3002020796 to be issued to the Industry in mid-April 2021. SNC said that it is targeting the proposed licensing action submittal, regarding SNC QATR change, to the NRC approximately three weeks after the issuance of the EPRI Technical Report 3002020796.

NRC Questions to SNC

The NRC asked if the EPRI report specific to the SNC fleet will be available to the public and will it be attached to the proposed submittal. SNC stated that the EPRI report will be available to the public and will be attached to the proposed submittal. The NRC staff questioned the definition of the EPRI report exigent conditions. EPRI said that exigent conditions are clearly defined in the EPRI report. The NRC staff asked about version control of the EPRI report. EPRI stated that final version of the EPRI report will be carefully controlled by EPRI's control process. The NRC staff asked about the reduction of commitment in the proposed SNC fleet QATR change. SNC said that the reduction in commitment only applies to the fully remote vendor inspection and not to the hybrid method. The NRC staff questioned SNC regarding the requested time for completion of the NRC review. SNC stated that it would request the NRC to complete its review within 60 days of the submittal.

Public Questions to NRC

There were seven members of the public in attendance. The public attendees had no questions or comments for the NRC staff.

Closing

The NRC staff made no regulatory decisions during the meeting.

Once received, the NRC staff will perform a thorough review of the proposed licensing action request 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 10:27 am (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. 50-321, 50-366, 50-348,
50-364, 50-424 and 50-425

Enclosure: List of Attendees

cc w/encls: Listserv

LIST OF ATTENDEES
MARCH 31, 2021, PUBLIC MEETING WITH SOUTHERN NUCLEAR COMPANY
REGARDING A PROPOSED LICENSING ACTION REQUEST TO CHANGE THE QUALITY
ASSURANCE PLAN
EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2
JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2
VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2

<u>ATTENDEE</u>	<u>REPRESENTING</u>
John G. Lamb	U.S. Nuclear Regulatory Commission (NRC)
Mike Markley	NRC
Kerri Kavanagh	NRC
Jonathon Ortega-Luciano	NRC
Stephanie Devlin-Gill	NRC
Rich Smith	NRC
Tim Enfinger	Southern Nuclear Operating Company (SNC)
Jamie Coleman	SNC
Ken Lowery	SNC
Gary Mingo	SNC
Amy Aughtman	SNC
Roland Bergeron	SNC
Zach Betsill	SNC
Will Garrett	SNC
Tracy Honeycutt	SNC
Marc Tannenbaum	Electric Power Research Institute (EPRI)
Allison Read	EPRI
Andrea Boynton	Duke Energy
Mark Coren	Duke Energy
Earl Mayhorn	Ameren
Rachel Czuba	Sonic Systems International, Inc.
David Soward	Xcel Energy

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RidsNrrPMFarley Resource

VCusumano, NRR

MMarkley, NRR

CSafouri, Region 2

MEndress, Region 2

RLukes, NRR

SKrepel, NRR

ADAMS Accession Nos.:

ML21092A015 (Package)

ML21056A330 and ML21084A079 (Meeting Notices)

ML21092A008 (Meeting Summary)

ML21084A287 (Meeting Slides)

OFFICE	DORL/LPL2-1/PM	DORL/LPL2-1/LA	DRO/IQVB/BC	DORL/LPL2-1/BC	DORL/LPL2-1/PM
NAME	JLamb	KGoldstein	KKavanagh	MMarkley	JLamb
DATE	03/31/2021	04/02/2021	04/02/2021	04/08/2021	04/08/2021

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