



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

September 27, 2021

MEMORANDUM TO: Philip J. McKenna, Chief
Vogtle Project Office
Office of Nuclear Reactor Regulation

FROM: Cayetano Santos Jr., Senior Project Manager
Vogtle Project Office
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR
OPERATING COMPANY ON AUGUST 19, 2021

Cayetano Santos Jr.

Signed by Santos, C
on 09/27/21

The U.S. Nuclear Regulatory Commission (NRC) staff held a public observation meeting with Southern Nuclear Operating Company (SNC) on August 19, 2021. The purpose of the meeting was to discuss two topics: (1) NRC staff's Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52 lessons learned initiative and (2) pre-submittal discussion of a draft license amendment request (LAR) regarding clarification of inspections, tests, analyses, and acceptance criteria (ITAAC) regarding invessel components.

The meeting notice can be found in the Agencywide Documents Access and Management System (ADAMS) Accession No. ML21230A123. The meeting notice was also posted on the NRC public website. Enclosures 1 and 2 are the meeting agenda and attendance list for the meeting, respectively. The documents referenced during the discussion can be found at the ADAMS Accession Nos. given below:

NRC Memorandum dated July 12, 2021: 10 CFR Part 52 Lessons-Learned with Construction at Vogtle 3 & 4 and V.C. Summer 2 & 3	ML21160A031
NRC Staff Slides: 10 CFR Part 52 Construction Lessons-Learned	ML21228A005
Draft Request for License Amendment and Exemption: Clarification of ITAAC Regarding Invessel Components (LAR-21-001)	ML21230A016

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Meeting Summary

On August 19, 2021, NRC staff held an observation public meeting with SNC to discuss (1) 10 CFR Part 52 lessons learned initiative and (2) pre-submittal discussion of a draft LAR to clarify ITAAC regarding invessel components.

Topic 1

The first topic was a discussion of NRC staff's 10 CFR Part 52 lessons learned initiative. The charter for this effort is described in a memo dated July 12, 2021 (ADAMS Accession No. ML21160A031). The NRC staff described the objectives of this initiative, the documents to be produced, and the interim milestones in the project plan. The NRC's presentation can be found at ADAMS Accession No. ML21228A005. At the conclusion of the discussion, there was an opportunity for the public to provide comments and ask questions. There were no comments or questions from the public.

Topic 2

The second topic was a pre-submittal discussion of draft LAR 21-001 to clarify proposed changes to certain ITAAC for as-built inspections and tests related to invessel components. SNC staff began by reviewing the events leading up to the development of this draft LAR including discussions held at public meetings on June 24, July 8, and August 12, 2021 (ADAMS Accession Nos. ML21194A040, ML21194A039, and ML21230A006, respectively). SNC staff emphasized that draft LAR 21-001 does not propose any design changes to any equipment or modify any inspections or tests performed after fuel load. SNC emphasized that the changes strictly relate to certain ITAAC in the combined license, Appendix C and the associated plant-specific design control document. No changes are proposed for the final safety analysis report. The traditional LAR format was also revised to facilitate the NRC staff's review. SNC staff described the specific changes proposed in draft LAR 21-001 (ADAMS Accession No. ML21230A016). Specifically, the proposed changes are related to ITAAC index number 68 (2.1.03.01), number 75 (2.1.03.06.i), number 515 (2.5.01.03e), number 565 (2.5.05.02.i), and number 570 (2.5.05.03b).

Below is a summary of the general comments and discussions:

- The NRC staff noted that the regulatory evaluation discussion in the draft LAR did not include some requirements for ITAAC and environmental qualification such as 10 CFR 52.97(b); 10 CFR 52.79, "Contents of applications; technical information in final safety analysis report"; 10 CFR 50.49, "Environmental qualification of electric equipment important to safety for nuclear power plants"; and General Design Criterion 4, "Environmental and dynamic effects design bases."
- The NRC staff commented that the uncompleted ITAAC notifications (UINs) provided in Enclosure 4 are not needed to support this LAR but that information from these UINs that support justification for the requested changes should be included in the body of the LAR. SNC staff noted that LAR 16-014 included draft ICNs. The NRC staff will not determine the acceptability of any ITAAC notifications as part of its review of this LAR. Formal submittals of any ITAAC closure notifications for Vogtle Electric Generating Plant Units 3 and 4 should be done separately from an LAR.
- The NRC staff commented that for the ITAAC subject to this LAR that identify specific equipment listed in a table, consideration of each listed component should be made when justifying the proposed ITAAC changes.

- The NRC staff commented that it may be helpful to identify the specific activities that need to be deferred until after fuel load when performing the inspections, tests, and analyses for these ITAAC.
- The NRC staff commented that for any ITAAC proposed to be deleted, all related remaining ITAAC, or other relevant docketed material, should be identified.
- The NRC staff noted that the acceptability of the environmental qualification of components not only refers to the design and testing of the components, but also deals with the criteria related to the components' final orientation, placement, and other physical conditions or characteristics within the components' final "as-built" location.

Below is a summary of comments and discussions regarding specific ITAAC:

- ITAAC index number 68
 - SNC proposes to delete this ITAAC because other requirements such as license conditions and scope of other remaining ITAAC fulfill the purpose of this ITAAC.
 - In response to a question from the NRC staff, SNC staff stated that ITAAC index numbers 72 and 75 verify the design commitment of ITAAC index number 68. The NRC staff commented that identifying all the ITAAC that support deleting ITAAC index number 68 should be included in the LAR.
 - In response to a question from the NRC staff, SNC staff stated that combined license (COL) license conditions (2.D(3)(c), (d), and (e)) point to Updated Final Safety Analysis Report (UFSAR) Section 14.2.10.1, "Initial Fuel Loading and Precritical Tests," to maintain the design of the components following authorization to load fuel.
- ITAAC index number 75
 - The NRC staff also asked about the basis for removing the verification that seismic Category I equipment is located on the nuclear island. SNC staff responded that other portions of this ITAAC verify some of these components are located on the nuclear island. SNC has not received all its fuel assemblies and saw no value in an ITAAC to confirm that all fuel assemblies are on site prior to fuel load because fuel cannot be loaded unless it is on site. The NRC staff noted that the combined license does specify that the location of the fuel assemblies prior to fuel load is on the nuclear island and that the purpose of that specification is that Seismic Category I equipment be in its final location on the nuclear island.
 - The NRC staff asked what other activities will be done to ensure that components identified by ITAAC subject to this LAR are properly qualified and installed correctly in their final as-built location. SNC staff cited other regulatory requirements such as license conditions that provide the same intent as this ITAAC. The staff noted that simply citing a requirement is not as helpful as explaining what will be done and how verification that equipment is correctly installed is accomplished. SNC staff will consider adding references to other documents such as the UFSAR in the LAR that will describe activities performed to ensure the design commitment of this ITAAC is met.
 - Regarding the proposed change to 9.a.ii, the NRC staff noted that the components in this portion of the ITAAC are external to the reactor vessel so the LAR would need to provide adequate justification for why equipment external to the reactor vessel could not be completed prior to fuel load and why this equipment could not meet the definition of "as built."

- The NRC staff comments were not limited to Category I seismic equipment but also included Environmental Qualification of electrical equipment important to safety and Class 1E electrical equipment.
- SNC staff stated that they will consider adding more detail about components that they generally refer to in the draft LAR as “equipment.”
- ITAAC index number 515
 - SNC staff noted that the proposed change exempts the core exit temperature sensors from the as-built inspection requirement of the ITAAC and that inspections of the core exit temperature sensors will still be performed but not in their final “as-built” location. The NRC staff asked how the proposed addition of the inspection of the core exit temperature sensors verifies the acceptance criterion since these components are in storage. SNC staff responded that the use of inspections performed at the manufacturing facility will verify that the core exit temperature sensors are properly installed in the incore thimble assembly.
 - The NRC staff noted that the purpose of this ITAAC is to verify that the sensors used in the Diverse Actuation System (DAS) are separate from sensors in the Protection and Safety Monitoring System (PMS); therefore, the “as-built system” referred to in this ITAAC is the DAS.
 - SNC staff stated that they will consider moving some of the justification for this proposed change from the Enclosure 4 discussion to the LAR.
- ITAAC index number 565
 - SNC staff stated that the changes proposed for ITAAC Index number 75 will be similar to the changes that will be proposed for ITAAC Index number 565.
- ITAAC index number 570
 - SNC staff highlighted another change they propose to make that is not shown in the draft LAR that was submitted to support this pre-submittal meeting - the term “connector boxes” will be changed to “connectors” to be consistent with terms used in the UFSAR.
 - In response to questions from the NRC staff, SNC staff clarified the cable bridge from the integrated head package to the connector panel have sheaths and that for the core exit thermocouples, each individual Class 1E cable is sheathed. SNC may also add references in the LAR to additional documents that describe these cables (e.g., UFSAR and a Westinghouse Electric Company WCAP report, as appropriate).
 - The NRC staff commented that both the cables for the core exit temperature sensors in the incore thimble assemblies and the head area cables are required to have sheaths.

Following the discussion of proposed ITAAC changes in the draft LAR, SNC staff presented the draft UINs shown in Enclosure 4. SNC staff agreed to consider comments provided the NRC staff during this meeting when revising the draft LAR.

At the conclusion of the discussion, there was an opportunity for the public to provide comments and ask questions. There were no comments or questions from the public.

Docket Nos.: 52-025
52-026

Enclosures:
As stated

cc w/encls: Listserv

SUBJECT: SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR
OPERATING COMPANY ON AUGUST 19, 2021 DATED:
SEPTEMBER 27, 2021

DISTRIBUTION:

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ADAMS Accession No.: ML21239A156***via e-mail****NRR-106**

OFFICE	PM: NRR/VPO	LA: NRR/VPO	BC: RII/DCO/CIB2	BC:NRR/DEX/EEEB
NAME	CSantos	RButler	BDavis	WMorton
DATE	09/13/2021	09/13/2021	09/20/2021	09/24/2021
OFFICE	BC: NRR/VPO	BC:NRR/DEX/EICB	BC:NRR/DEX/ELTB	BC:NRR/DEX/EMIB
NAME	PMcKenna	MWaters	JJohnston	ITseng
DATE	09/27/2021	09/27/2021	09/27/2021	09/20/2021
OFFICE	PM: NRR/VPO			
NAME	CSantos (s)			
DATE	09/27/2021			

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**AGENDA FOR PUBLIC MEETING
U.S. NUCLEAR REGULATORY COMMISSION
Thursday, August 19, 2021
Teleconference
9:00 a.m. – 12:00 p.m.**

PURPOSE: To discuss issues associated with the safety review of licensing actions for Southern Nuclear Operating Company's (SNC) Vogtle Electric Generating Plant (VEGP) Units 3 and 4.

Time	Topic	Led By
9:00 a.m.	Opening Remarks and Introductions	NRC
9:05 a.m. – 9:30 a.m. 9:30 a.m. – 10:30 a.m.	Discussion of Identified Topics (1) 10 CFR Part 52 lessons learned initiative (2) pre-submittal discussion of a draft LAR to revise several as-built ITAAC Opportunity for Public Comment Following each Topic	NRC/SNC NRC/Public
10:30 a.m.	Open Portion Concludes	NRC
	Closed Portion of Meeting (If needed)	NRC/SNC
12:00 p.m.	Adjourn	NRC

PUBLIC MEETING
U.S. NUCLEAR REGULATORY COMMISSION
Thursday, August 19, 2021
List of Attendees

Name	Organization
Cayetano (Tanny) Santos Philip McKenna James Gaslevic William (Billy) Gleaves Michael Waters Jennie Rankin Jason Huang Adakou Foli Ryan Nolan Ian Tseng Yuken Wong William Roggenbrodt Ed Kleeh Matthew McConnell Jeanne Johnston Michael Webb Mike King Christopher Welch	NRC/Office of Nuclear Reactor Regulation
Katie McCurry Marissa Bailey Nicole Coover Omar Lopez-Santiago Andrea Johnson Bradley Davis Jason Eargle JP Parent	NRC/Region II

Michael Spencer	NRC/Office of the General Counsel
Kelli Roberts Jon Fisher Jamie Coleman Tim Cureton Adam Wichman Steve Leighty Nick Kellenberger Ken Gregory Amy Chamberlain Eddie Grant Stephanie Agee Jerri Byers Keith Dorsey Dong Nguyen Mike Yox Bob Hirmanpour Alan Lovett	Southern Nuclear Operating Company
Zach Harper	Westinghouse
Bill Jacobs	Members of the Public

Note: All participated via teleconference.