

**From:** Markley, Michael  
**Sent:** Friday, September 10, 2021 11:51 AM  
**To:** Joyce, Ryan M.  
**Cc:** Gayheart, Cheryl Ann; Carusone, Caroline; Lamb, John; Kalathiveettil, Dawnmathews  
**Subject:** Clarification call

Ryan,

Thanks for the pre-licensing meeting summary clarifying call today. John is making the edit to clarify "a number of variations" as compared to "significant" variations concerning the planned submittal per your feedback.

Reflecting back when we did Farley Initiative 4b (TSTF-505), we had a discussion with SNC concerning TSTF-505, Revision 2, which was still under development by the industry after NRC withdrew support for Revision 1. Cheryl's predecessor, Jim Hutto, asked if we would entertain a Farley LAR following the Vogtle Initiative 4b effort that had been approved recently and was, in part, the basis for ongoing discussions on TSTF-505 Revision 2. We said, absolutely. NRC and SNC mutually understood that 85% or more of what might be included in TSTF-505 Revision 2, could be achieved in Initiative 4b and that SNC could always come back for another LAR to adopt TSTF-505 later. The result was that Farley Initiative was done within a year while many TSTF-505 reviews languished.

For Hatch, the simple path forward is to either to again follow Initiative 4b or TSTF-505, Revision 2, explicitly. The more variations, the more complex the review. If Hatch is a hybrid between Initiative 4b and TSTF-505, Revision 2, it will be more complex and take longer. Likewise, I would suggest against throwing in long-needed administrative changes that could be better done in a stand-alone administrative amendment.

It is generally better to get the 85% of benefit rather than holding up the entire submittal based on the 15% of significant difference that could be done via separate amendment, if needed. As you may recall, Vogtle Initiative 4b took four years because of the contentious loss-of-function positions that held up the entire review. During yesterday's follow-up pre-licensing call, I heard some discussion about NRC approving loss of function for Vogtle and Farley, that sounded a little different than I recall in the approvals. My suggestion is to confirm those positions, as they have the potential to cause substantial delay in the Hatch review if not comparable to what NRC has approved previously.

I am not sure we want to do clarification calls for meeting summaries on a regular basis, but if it can clarify the above for specific reviews, we would certainly do so.

**Michael T. Markley, Chief**

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