



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

April 26, 2022

LICENSEE: SOUTHERN NUCLEAR OPERATING COMPANY

FACILITY: VOGTLE ELECTRIC GENERATING PLANT, UNIT 4

SUBJECT: SUMMARY OF MARCH 31, 2022, MEETING WITH SOUTHERN NUCLEAR OPERATING COMPANY

On March 31, 2022, the U.S. Nuclear Regulatory Commission (NRC) held a virtual public meeting with representatives of Southern Nuclear Operating Company (SNC). The purpose of the meeting was to conduct a pre-submittal discussion of draft license amendment request and exemption request (LAR 22-001) to remove several security-related inspections, tests, analyses, and acceptance criteria (ITAAC) from the Vogtle Electric Generating Plant (VEGP) Unit 4 combined license (COL). The meeting notice and agenda are available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML22087A404. A list of attendees is enclosed.

Draft LAR 22-001 proposes to delete 18 ITAAC (and their associated design descriptions in the COL Appendix C and plant-specific Tier 1) for VEGP Unit 4 (ADAMS Accession No. ML14100A135). SNC staff stated that even though some sections of draft LAR 22-001 are still under development, this pre-submittal meeting was requested in order to facilitate early technical discussions with the NRC staff. Draft LAR 22-001 will be updated based on comments received from the staff during this meeting and a second pre-submittal meeting will be requested. Draft LAR 22-001 proposes to delete the VEGP Unit 4 ITAAC listed below and their associated design descriptions because (1) the construction activities associated with these Unit 4 ITAAC are similar to, or an extension of, the construction activities for Unit 3; (2) the design commitments in these Unit 4 ITAAC duplicate requirements in Title 10 of the *Code of Federal Regulations* (10 CFR) Part 73, "Physical Protection of Plants and Materials"; (3) the Physical Security Program for Unit 4 addresses the 10 CFR Part 73 regulatory requirements; and (4) where closure of Unit 4 ITAAC rely on equipment used for Unit 3, the maintenance of Unit 4 ITAAC would be a significant burden on SNC resources.

- ITAAC 2.6.09.05a (Index No. 644)
- ITAAC 2.6.09.05c (Index No. 646)
- ITAAC 2.6.09.06 (Index No. 647)
- ITAAC 2.6.09.08 (Index No. 650)
- ITAAC 2.6.09.13a (Index No. 652)
- ITAAC 2.6.09.13c (Index No. 654)
- ITAAC 2.6.09.15a (Index No. 655)
- ITAAC C.2.6.09.02 (Index No. 659)
- ITAAC C.2.6.09.03a (Index No. 660)
- ITAAC C.2.6.09.03b (Index No. 661)

- ITAAC C.2.6.09.05a (Index No. 664)
- ITAAC C.2.6.09.06 (Index No. 666)
- ITAAC C.2.6.09.07 (Index No. 667)
- ITAAC C.2.6.09.08a (Index No. 668)
- ITAAC C.2.6.09.09 (Index No. 670)
- ITAAC 3.3.00.14 (Index No. 820)
- ITAAC 3.3.00.16 (Index No. 821)
- ITAAC 3.3.00.17 (Index No. 822)

Below is a summary of the general comments and discussions:

- The NRC staff noted that other licensing actions in which ITAAC were deleted, the design descriptions associated with the deleted ITAAC were kept. SNC staff responded that deletion of a design description in previous licensing actions was done on a case-by-case basis. If deleting an ITAAC eliminated only a portion of the design description, then the design description was retained. The NRC staff responded that deleting Tier 1 information may not be appropriate because they describe requirements that should exist for the life of the plant. The NRC staff also noted that before deleting design description information, it would be important to determine whether that information exists elsewhere in Tier 1 so that the information is not lost.
- The NRC staff noted that the existence of a regulation that forms the basis of an ITAAC is not justification to eliminate the related ITAAC.
- The NRC staff noted that part of SNC's justification for deleting these security ITAAC is that validating that security equipment is installed properly is redundant to 10 CFR Part 73 requirements. The staff asked if the same justification could apply to eliminate ITAAC associated with validating that safety-related equipment is installed properly. SNC staff stated that there is a difference between safety and security so applying this logic to safety systems is not appropriate. Security ITAAC were written for a stand-alone unit and did not consider integrated security systems between two units. The NRC staff responded that inspections will still need to be performed for equipment that has not been installed at VEGP Unit 4; however, tests or inspections performed to satisfy VEGP Unit 3 ITAAC do not need to be reperformed for Unit 4. It is acceptable for Unit 4 ITAAC closures to use inspections, tests, or analyses from Unit 3 ITAAC completion, if applicable to Unit 4. SNC staff understand that additional testing would be required for VEGP Unit 4 ITAAC if Unit 3 ITAAC completion is referenced, but noted that a significant burden is associated with ITAAC maintenance efforts.
- In response to questions from the NRC staff, SNC staff stated that the same tests, inspections, or analyses will be performed at VEGP Unit 4 whether or not these 18 ITAAC are deleted (i.e., draft LAR 22-001 does not request changes to any technical requirements). However, if the ITAAC are deleted at least 2,200 man-hours of effort could be eliminated by SNC's ITAAC organization by not performing the associated ITAAC closure and ITAAC maintenance activities. SNC staff stated that a significant portion of this effort is associated with ITAAC maintenance activities. The NRC staff asked if SNC had considered whether to request an exemption from ITAAC maintenance requirements in 10 CFR 52.99(c)(2). SNC staff stated they had not considered that option.

- Regarding ITAAC Index No. 644, the NRC staff asked what additional work is needed to close this ITAAC for VEGP Unit 4. SNC staff stated that the added protected area perimeter for VEGP Unit 4 still needs to be tested. Since this testing involves the same computer system and alarm stations as VEGP Units 1-3, it would need to be coordinated such that the VEGP Unit 4 test would not disrupt the other units.
- The NRC staff asked if ITAAC Index No. 646 could have been closed for VEGP Units 3 and 4 at the same time. SNC staff stated that testing communications with onsite response personnel for VEGP Unit 4 still needs to be performed. SNC staff noted ITAAC Index No. 647 would need to be closed prior to closure of ITAAC Index No. 646.
- Regarding ITAAC Index No. 647, the NRC staff asked why it would not be more prudent to submit an ITAAC closure notification rather than a LAR and exemption request. SNC staff stated that the burden associated with ITAAC closure and ITAAC maintenance requirements are significant.
- Regarding ITAAC Index No. 647, the NRC staff asked if all four units would be within a single protected area prior to the 10 CFR 52.103(g) finding for VEGP Unit 4. SNC currently plans to declare a single protected area prior to the 10 CFR 52.103(g) finding for VEGP Unit 4, but noted that the NRC has approved an exemption request that would allow SNC to declare the protected area after the 10 CFR 52.103(g) finding but prior to fuel load.
- Regarding ITAAC Index No. 650, SNC staff confirmed that the design and testing of equipment at VEGP Unit 3 is the same as that for VEGP Unit 4. The NRC staff noted that the equipment unique to VEGP Unit 4 will still need to be tested.
- Regarding ITAAC Index No. 652, SNC stated that the remaining work to be done for VEGP Unit 4 involves testing the telephone service between the main control room and the central and secondary alarm stations. The NRC staff noted that testing radio communications with security personnel at VEGP Unit 4 also needs to be performed.
- Regarding ITAAC Index No. 664, the NRC staff asked if there are separate access points between VEGP Units 3 and 4. SNC staff stated that the personal access points are common to both units but VEGP Unit 4 has a secondary vehicle access point that still needs to be tested.
- Regarding ITAAC Index No. 820, SNC staff noted that the Unit 3 ITAAC Closure Notification for this ITAAC was submitted the same week of this public meeting.
- SNC will consider the comments provided by the NRC staff in preparing a revision to draft LAR 22-001.

Members of the public were not in attendance so there were no comments or questions from the public. The staff did not receive any Public Meeting Feedback forms.

Please direct any inquiries to me at 301-415-7270 or Cayetano.Santos@nrc.gov.

Sincerely,



Signed by Santos, Cayetano
on 04/26/22

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

Docket No. 52-026

Enclosure:
List of Attendees

cc: Listserv

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OPERATING COMPANY DATED: APRIL 26, 2022

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CDeMessieres, NRR

JRankin, NRR

NSimonian, NSIR

ABowers, NSIR

TKeene, NSIR

ADAMS Accession No.: ML22098A129

***via e-mail**

NRR-106

OFFICE	NRR/VPO/PM	NRR/VPO/LA	NSIR/DPCP/RSB/BC
NAME	CSantos	RButler	ABowers
DATE	4/8/22	4/13/22	4/22/22
OFFICE	NSIR/DSO/SOSB/BC	NRR/VPO/BC	NRR/VPO/PM
NAME	TKeene	VHall	CSantos
DATE	4/25/22	4/25/22	4/26/22

OFFICIAL RECORD COPY

LIST OF ATTENDEES

MARCH 31, 2022, MEETING WITH SOUTHERN NUCLEAR OPERATING COMPANY

Name	Organization
Cayetano (Tanny) Santos William (Billy) Gleaves Christopher Welch Chandu Patel Michael Webb Victor Hall Greg Bowman Phil O'Bryan James Gaslevic Garry Armstrong	NRC/Office of Nuclear Reactor Regulation
Niry Simonian Anthony Bowers Todd Keene Scot Sullivan Jeremiah Rey	NRC/Office of Nuclear Security and Incident Response
Randy Patterson Nicole Coover Omar Lopez-Santiago Andrea Johnson	NRC/Region II
Caty Nolan Dante Johnson	NRC/ Office of the Executive Director for Operations
Michael Spencer Norman St. Amour	NRC/Office of General Counsel
Amy Chamberlain Neil Haggerty Kelli Roberts Steve Leighty Jamie Coleman Steve Shipman Bob Beilke Michael Long Mitch Hillis	Southern Nuclear Operating Company
None	Members of the Public