



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

February 11, 2015

APPLICANT: Tennessee Valley Authority

FACILITY: Watts Bar Nuclear Power Plant, Unit 2

SUBJECT: SUMMARY OF DECEMBER 18, 2014, MEETING WITH TENNESSEE VALLEY AUTHORITY REGARDING THE WATTS BAR NUCLEAR PLANT, UNIT 2 OPERATING LICENSE APPLICATION (LICENSING MILESTONES)

On December 18, 2014, a Category 1 public teleconference was held between the U.S. Nuclear Regulatory Commission (NRC or the Commission) staff and representatives of the Tennessee Valley Authority (TVA). The purpose of this meeting was for TVA and the NRC staff to discuss process-related milestones for both TVA and the NRC for the final stages of the operating license application review and decision on Watts Bar Nuclear Plant (WBN), Unit 2. The discussion focused on the relationship between process-related NRC milestones and construction completion milestones for TVA. The meeting notice and agenda, dated November 14, 2014, is available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML14349A006. A list of attendees is provided as Enclosure 1.

TVA presented meeting slides provided as Enclosure 2. The NRC staff had no formal presentation material at this meeting. The second portion of this meeting was closed to the public in order to discuss security-related information on the topic of cyber security.

TVA explained its plans for submitting what will be referred to as the "Substantially Complete Letter." This letter is used to communicate to the NRC that construction activities at the site are complete and the plant is nearly ready to receive fuel on-site. The NRC uses this declaration to satisfy one of the criteria stated in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.57, "Issuance of an Operating License." TVA explained that it planned to submit this letter 90 days prior to loading fuel and 60 days prior to the Commission's decision on whether to grant them an operating license. This letter would also identify TVA activities that would need to be completed prior to receipt of fuel on site in various attachments. In addition to this letter, TVA plans to submit a "Ready for Fuel Load" letter, which will close any open items necessary for fuel load that were identified in the Substantially Complete Letter, and that the plant is ready to load fuel. TVA recognizes that some inspections related to NRC Inspection Procedure 94300 will be taking place in parallel to these efforts. TVA also disclosed that its current schedule for fuel load is the end of May 2015, and described that they plan to submit the Substantially Complete Letter by the end of February 2015. Most of this discussion followed the talking points on the handouts.

The NRC staff asked TVA to clarify what was meant by "construction completion" (which triggers the Substantially Complete Letter) and TVA stated that it identifies construction as complete when all of the systems have been turned over to startup and operations. In addition, the NRC staff stated that it did not feel that the Substantially Complete Letter was needed before the NRC staff's vote paper to the Commission. The NRC staff reminded TVA that during the October 30, 2014, Commission Meeting, members of the Commission indicated to the NRC staff that they would appreciate more time than the currently scheduled 60 days to review the information related to WBN Unit 2.

The NRC staff clarified TVA's understanding that a *Federal Register* notice had to be issued by the staff prior to licensing was not accurate. The NRC staff stated that the requirements of 10 CFR 50.58(b)(2) were met by the notices for an opportunity for hearing published in 2009.

Some members of the public had comments and questions for the NRC. Mr. Marvin Lewis, a concerned member of the public, commented that it sounded as though the NRC and TVA were rushing through this process in an effort to get everything done. The NRC assured Mr. Lewis that the discussions of schedules and timelines are of minor importance to the NRC. The NRC's primary focus is the safety of the plant. The NRC will take as much time as needed to make a finding of reasonable assurance on the safety of the plant. Whether or not the NRC can complete its review along the same timeline as TVA is immaterial, though the NRC appreciates the information for its own awareness. Mr. Brian Paddock of the Tennessee Sierra Club asked the NRC to clarify whether the hearing opportunities have been exhausted for the WBN Unit 2 operating license application. NRC staff explained that a notice for an opportunity for hearing was published in 2009, and the deadlines for that has expired. In accordance with 10 CFR Part 2, on a case-by-case basis, the NRC will consider additional contentions, but they must be based on new and significant information.

No feedback forms were submitted at this meeting and no regulatory decisions were made at this meeting.

Please direct any inquiries to Justin Poole at 301-415-2048, or to [justin.poole@nrc.gov](mailto:justin.poole@nrc.gov).

A handwritten signature in black ink, appearing to read 'JP', with a long horizontal stroke extending to the left.

Justin C. Poole, Senior Project Manager  
Watts Bar Special Projects Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-391

Enclosures:

1. List of Attendees
2. Meeting Slides

cc w/enclosures: Distribution via Listserv

## LIST OF ATTENDEES

**Applicant:** Tennessee Valley Authority (TVA) **Plant:** Watts Bar Nuclear Plant (WBN), Unit 2

**Subject:** Licensing Milestones **Date:** December 18, 2014

**Location:** Teleconference **Time:** 8:30 a.m. – 10:00 a.m.

NAME	TITLE	ORGANIZATION
Michele Evans	Division Director	U.S. Nuclear Regulatory Commission (NRC)/Office of Nuclear Reactor Regulation (NRR)/Division of Operating Reactor Licensing (DORL)
Louise Lund	Deputy Division Director	NRC/NRR/DORL
Justin Poole	Sr. Project Manager, Watts Bar, Unit 2	NRC/NRR/DORL/Watts Bar Special Projects Branch (LPWB)
Anthony Minarik	Project Manager	NRC/NRR/DORL/LPWB
Mike Miernicki	Project Manager	NRC/NRR/DORL/LPWB
Jeanne Dion	Project Manager, Watts Bar, Unit 1	NRC/NRR/DORL/LPWB
Robert Haag*	Branch Chief	Region II/Division of Construction Projects/Branch 3
Gene Cobey	Licensing and Engineering Management	TVA
Gordon Arent	Director of Licensing, Watts Bar	TVA
Steve Hilmes	Engineering Management	TVA
Laura Snyder	Licensing and Engineering Manager	TVA

NAME	TITLE	ORGANIZATION
Joe Calle	Licensing and Engineering Manager	TVA
Bob Bryan*	Licensing	TVA
Marvin Lewis*		Public
Brian Paddock*		Tennessee Sierra Club
Ruth Thomas*		Public

\*participated via teleconference

**Enclosure 2**

Meeting Slides

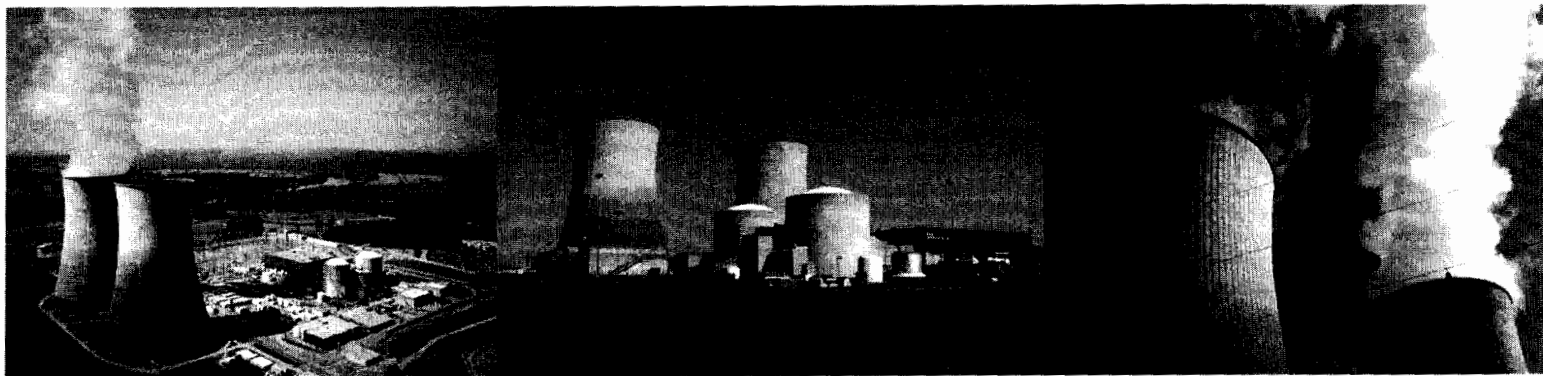


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# Watts Bar Nuclear Plant Licensing Strategy Discussion

December 18, 2014

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# **TVA** Agenda

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- Licensing Communications
- Substantially Complete Letter
- Ready For Fuel Load Letter
- Unit 2 Completion
- Unit 2 - Key Milestone Linkages
- Other Items of Interest



# **TVA** Substantially Complete Letter

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- Definition of Substantially Complete
  - When the Owner takes responsibility
  - T 0 - based on plant completion, not time to startup
- Substantially Complete Letter timed to support notation paper
  - allows Commission 60 days for review of notation paper
  - approximately 90 days prior to fuel load
  - Does this sequence work?
- Letter will include a Readiness Assessment Report
  - Readiness Assessment Report will provide inventory of TVA Quality Activities to construct, test, transition to dual unit operations
  - Readiness Assessment Report will include high level list of remaining construction and testing activities to complete before fuel load

## **TVA** Substantially Complete Letter

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- Substantially Complete letter aligned to 10 CFR 50.57
  - (1) Construction of the facility has been substantially completed, in conformity with the construction permit and the application as amended, the provisions of the Act, and the rules and regulations of the Commission; and
  - (2) The facility will operate in conformity with the application as amended, the provisions of the Act, and the rules and regulations of the Commission; and
  - (3) There is reasonable assurance (i) that the activities authorized by the operating license can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the regulations in this chapter

# **TVA** Substantially Complete Letter

## Substantially complete letter alignment to the sub-parts of 10 CFR 50.57

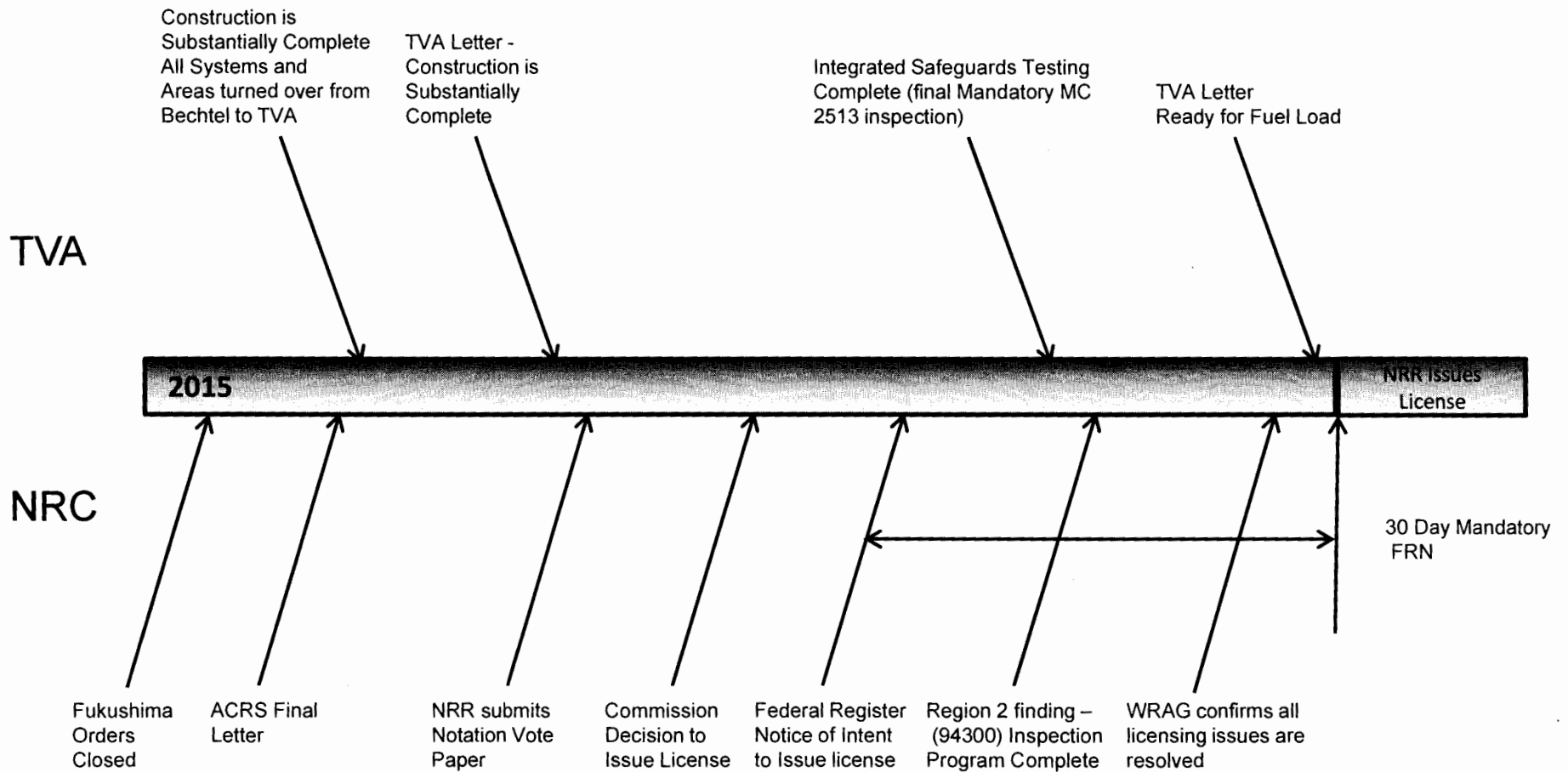
10CFR 50.57 Sub-part	Substantially Complete Letter Section
<p>(1) Construction of the facility has been substantially completed, in conformity with the construction permit and the application as amended, the provisions of the Act, and the rules and regulations of the Commission; and</p>	<p>Attachment A1- Current Schedule for Completion of Remaining Work            Attachment A2 - Design Basis Verification            Attachment A3 - Refurbishment Program Description            Attachment A4 - CAPs and SPs            Attachment A5 - Status of New Generic Communications            Attachment A6 - Status of Generic Communications            Attachment A7 - Quality Assurance Activities</p>
<p>(2) The facility will operate in conformity with the application as amended, the provisions of the Act, and the rules and regulations of the Commission; and</p>	<p>Attachment B1 - Current Schedule for Completion of the Test Program</p>
<p>(3) There is reasonable assurance (i) that the activities authorized by the operating license can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the regulations in this chapter</p>	<p>Attachment C1 - Department Transition and Change Management Plans            Attachment C2 - Unit Differences - Design            Attachment C3 - Unit Differences - Training            Attachment C4 - Safety Culture</p>

## **TVA** Ready For Fuel Load Letter

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- Letter to be submitted just prior to fuel load
  - Will include:
    - Schedule for testing – Startup and Power ascension
    - List of activities that need completion prior to fuel load
    - Exemptions and anticipated conditions of the license
  - Will request quick turnaround
  - Will request full power license
  - Is there an implied linkage with the 94300 or other inspection process

# TVA Unit 2 - Key Milestone Linkages



## **TVA** Other Items of Interest

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- Connections between ORAT and Hot Functional Testing.
- Federal Register Notice 30-day notice per 50.58(b)(2). [LIC-110, Sect 6.17]
- Are there any other potential administrative process or procedural issues that should be addressed and included in the schedule?



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# Questions

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Please direct any inquiries to Justin Poole at 301-415-2048, or to [justin.poole@nrc.gov](mailto:justin.poole@nrc.gov).

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Justin C. Poole, Senior Project Manager  
Watts Bar Special Projects Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

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**DISTRIBUTION:**

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AWilson, RII	JDion, NRR	CMoulton, NRR
RidsNrrDraAfpb Resource	OLopez, RII	MMiernicki, NRR

**ADAMS Accession Nos.: PKG ML15043A310**

**Meeting Notice: ML14349A006**

**Meeting Summary: ML15020A346**

OFFICE	DORL/LWBSP/PMIT	DORL/LWBSP/PM	DORL/LPL2-2/LAIT	DORL/LWBSP/LA	DORL/LWBSP/BC	DORL/LWBSP/PM
NAME	AMinarik	JPoole	LRonewicz	BClayton	JQuichocho	JPoole
DATE	11/12/14	2/11/15	1/21/15	2/3/15	2/11/15	2/11/15

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