



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

September 24, 2020

MEMORANDUM TO: Chairman Kristine L. Svinicki  
Commissioner Jeff Baran  
Commissioner Annie Caputo  
Commissioner David A. Wright  
Commissioner Christopher T. Hanson

FROM: Ho K. Nieh, Director  
Office of Nuclear Reactor Regulation

SUBJECT: STATUS OF INSPECTIONS, TESTS, ANALYSES, AND  
ACCEPTANCE CRITERIA CLOSURE, AND INSPECTION AND  
LICENSING ACTIVITIES FOR VOGTLE ELECTRIC GENERATING  
PLANT, UNIT 3

The purpose of this memorandum is to inform the Commission of the status of the following activities related to Vogtle Electric Generating Plant, Unit 3: closure of inspections, tests, analyses, and acceptance criteria (ITAAC), inspections related to ITAAC and operational programs, and current licensing activities and any possible impact these activities might have on the timing of the staff's finding under Title 10 of the *Code of Federal Regulations* (10 CFR) 52.103(g). This memorandum has been made publicly available in the Agencywide Documents Access and Management System (ADAMS).

**Background:**

In SECY-13-0033, "Allowing Interim Operation under Title 10 of the *Code of Federal Regulations* Section 52.103," dated April 4, 2013 (ADAMS Accession No. ML12289A928), the staff proposed that the Commission delegate to the staff the 10 CFR 52.103(g) finding that all ITAAC acceptance criteria are met. Further, the staff stated that its 10 CFR 52.103(g) finding would be based on the ITAAC-related inspection activities performed during construction and the staff's independent ITAAC closure verification activities, which would be summarized in a Basis Document to be enclosed with a paper to the Commission. The Commission approved the staff's recommendation in the Staff Requirements Memorandum, dated July 19, 2013, for SECY-13-0033 (ADAMS Accession No. ML13200A115).

In SECY-06-0114, "Description of the Construction Inspection Program for Plants Licensed under 10 CFR Part 52," dated May 13, 2006 (ADAMS Accession No. ML060740479), the staff discussed inspecting the development and implementation of testing programs (i.e., the initial test program) and the other operational programs. The staff committed to inform the Commission of the status of those programs before the anticipated date for loading fuel.

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To support the commitments described above, the staff issued Office Instruction LIC-114, Revision 1, "Title 10 of the *Code of Federal Regulations* (10 CFR) 52.103(g) Finding and Communication Process" (ADAMS Accession No. ML20055E096). This office instruction describes the steps for informing the Commission of the status of regulatory activities in the final year of construction under a combined license and the actions the staff must take in support of determining whether to make the 10 CFR 52.103(g) finding. Per LIC-114, this document serves as the initial memorandum to the Commission on the status of ITAAC closure, NRC inspection activities for construction and operational programs, and licensing activities.

### **Status of ITAAC Completion:**

Southern Nuclear Operating Company (the licensee) is required, in accordance with 10 CFR 52.99(c)(1), to notify the U.S. Nuclear Regulatory Commission (NRC) that the prescribed inspections, tests, and analyses have been performed and the acceptance criteria are met. The staff reviews each of these ITAAC closure notifications (ICNs) to verify that the acceptance criteria are met. The results are then posted on the NRC public Web site <https://www.nrc.gov/reactors/new-reactors/new-licensing-files/vog3-icnsr.pdf>. As of August 31, 2020, Appendix C to the combined license NPF-91 for Vogtle Electric Generating Plant Unit 3 contains 399 ITAAC; the current status of the staff's ICN verification review is as follows:

- ICNs Verified            142
- ICNs Under Review     3
- ICNs Not Received    254

The staff has reviewed the Uncompleted ITAAC Notification for each ITAAC not yet completed. These Uncompleted ITAAC Notifications must provide sufficient information to demonstrate that the uncompleted ITAAC will be completed successfully. For each Uncompleted ITAAC Notification, the staff has determined that the licensee's methodologies are acceptable to close the associated ITAAC. If the licensee uses the planned methodologies, the ICNs should not differ significantly from the Uncompleted ITAAC Notifications, thereby streamlining the ICN review. In addition, staff are qualified and ready to process the significant number of ICN submittals anticipated within the last 60 days before scheduled fuel load. The NRC currently maintains six dedicated ICN reviewers with approximately two dozen other qualified reviewers available if needed to ensure timely review of ICNs.

The requirements of 10 CFR 52.99(c)(2) specify that after an ICN is submitted, the licensee shall notify the NRC in a timely manner of new information that materially alters the basis for determining that either the inspections, tests, and analyses were performed as required or that the acceptance criteria are met. These are referred to as ITAAC post-closure notifications. As of August 31, 2020, the NRC had received two ITAAC post-closure notifications and verified them to be acceptable. The ITAAC post-closure notifications were associated with ITAAC index numbers 335 and 336 related to construction design changes to increase the height of the turbine building elevations by three feet at each level, the addition of platforms above the operating deck, and the incorporation of the beyond design basis requirement to provide 800 gallons per minute of fire protection system water to be supplied to the spent fuel pool for cooling, heat removal, and inventory makeup.

On August 28, 2020, the licensee notified the NRC (Event Notification 54864) that due to a required design change to the protection and monitoring system to maintain class 1E

separation, ITAAC post-closure notifications will be required for ITAAC index numbers 534 and 538. The licensee plans to submit the ITAAC post-closure notifications within 30 days of correcting the identified condition.

In accordance with the requirements of 10 CFR 52.99(c)(4), the licensee shall notify the NRC that all ITAAC are complete. Consistent with the timeline in LIC-114, Revision 1, the "All ITAAC Complete" notification will likely be submitted to the NRC within approximately 17 days before the actual fuel load date.

### **Status of Inspection Activities:**

The staff continues to perform inspections of a sample of ITAAC to independently verify the licensee's performance of the inspections, tests, and analyses and that the results meet the acceptance criteria. These inspections also verify that the licensee (1) has quality construction programs, processes, and procedures, (2) provides adequate quality assurance oversight of construction activities, and (3) identifies and corrects conditions adverse to quality. A sample of the ICNs was inspected against the associated closure packages to verify the accuracy of the information reported in the ICNs. A comprehensive ITAAC Status Report provides the public with a hyperlink to each NRC inspection report related to a corresponding ITAAC, as well as the corresponding ICN and staff actions responding to the ICN. This report can be found on the NRC public Web site at <https://www.nrc.gov/reactors/new-reactors/new-licensing-files/vog3-icnsr.pdf>.

Approximately 85 percent of the planned ITAAC inspection workload has been completed. The NRC has 293 planned ITAAC related inspections remaining, representing approximately 2,700 hours of direct inspection workload. The NRC staff continues to closely monitor inspection program implementation and adjustments to our estimates will be based upon licensee performance, lessons learned, and inspection results. Additionally, in anticipation of a significant inspection workload near the end of construction, Region II is conducting multiple planning/readiness meetings with the licensee and Westinghouse Electric Company for ICNs that are scheduled to be submitted within the last 60 days before the anticipated 10 CFR 52.103(g) finding. Region II's efforts are positioning the NRC's inspectors to be prepared to complete all inspections necessary to support a timely 10 CFR 52.103(g) finding.

NRC staff are also focused on resolving outstanding inspection issues. One ITAAC inspection issue is currently open:

- Noncited Violation 05200025/2016004-02, Failure to Qualify Welding Procedure Specification (WPS) in Accordance with Applicable Code

The NRC issued the noncited violation in Inspection Report 2016-004 dated February 13, 2017 (ADAMS Accession No. ML17044A539). Two separate requests for code interpretations were submitted to the American Welding Society code committee related to this noncited violation. The last response by the American Welding Society code committee was issued May 2020. NRC disposition of this issue is in the final stages of concurrence.

The dynamic construction environment and a changing construction schedule pose a challenge for completing ITAAC inspections, especially as the completion of major construction milestones shifts closer to the licensee's planned fuel load date. In addition, due to restrictions resulting

from the Federal, state and local response to the COVID-19 public health emergency, the inspection program has been adapted to ensure its effectiveness while helping to protect the health and safety of inspectors. As a result, construction inspectors have primarily conducted inspections remotely during the public health emergency. Inspectors have conducted onsite inspections of ITAAC, the Initial Test Program, and operational programs based on safety significance and the uniqueness or complexity of the construction activity. For example, over the last few months, inspectors have been onsite to inspect portions of the conical roof installation, integrated leak test, and structural integrity test for Unit 3.

To address these challenges, Region II has frequent communications with the licensee to maintain a detailed awareness of their construction schedule to ensure that inspection activities are completed as early as possible and, in many cases, before the ICN submittal. The staff is also leveraging experience in similar inspection areas and is implementing lessons learned to adjust inspection scope and maximize the effectiveness of each inspection. The staff's agility and extensive communications will enable the inspectors to observe enough activities to ensure the licensee is meeting the NRC's regulatory requirements. In addition, Region II management has developed and is maintaining the resources and skill sets needed to complete the planned construction inspections. To mitigate COVID-19's effect on the ITAAC inspection program, Region II formed a Transition Readiness Group to review site and local conditions and determine which onsite inspections are appropriate and the precautionary measures that should be taken to help protect the health and safety of inspectors. These steps support a thorough and robust inspection program that can adapt to changing conditions.

In SECY-05-0197, "Review of Operational Programs in a Combined License Application and Generic Emergency Planning Inspections, Tests, Analyses, and Acceptance Criteria," dated October 28, 2005, the staff identified operational programs that are required by regulation, reviewed in a combined license application, and inspected to verify program implementation as described in the final safety analysis report. Chapter 13, Table 13.4-201, "Operational Programs Required by NRC Regulations," includes a listing of all the operational programs and their implementation milestones.<sup>1</sup> Enclosure 1 of this paper includes a table listing the programs in Table 13.4-201, their implementation milestones, and NRC inspections associated with the implementation of these programs as of August 31, 2020. The 10 CFR 52.103(g) finding is based on verification that the ITAAC, including the emergency planning ITAAC, have been successfully completed; it is not dependent on the inspection of any operational program other than the emergency planning program.

### **Status of Licensing Activities:**

As of August 31, 2020, the NRC has five licensing actions under review for Vogtle Electric Generating Plant Unit 3. Enclosure 2 identifies these proposed licensing actions, the licensee's requested completion date, and whether the licensing action is necessary to support the 10 CFR 52.103(g) finding. The staff anticipates completing its review of each licensing action on or before the requested date. In addition, there remains the potential for the licensee to identify the need for additional licensing actions up until the 10 CFR 52.103(g) finding. The Office of Nuclear Reactor Regulation through the Vogtle Project Office is in routine communications with the licensee's licensing management to remain cognizant of changes that may necessitate additional licensing actions and is maintaining a dedicated team of staff ready to conduct the necessary safety reviews in a timely manner.

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<sup>1</sup> Table 13-4.201 also includes operational programs implemented during the construction period.

**Future Staff Actions:**

As stated above, the staff anticipates the licensee will provide the "All ITAAC Complete" notification approximately 17 days prior to the actual fuel load date. Provided that (1) no ICNs are deficient, (2) no additional inspections are required to address either deficient ICNs or other emergent issues, and (3) there are no other regulatory activities that may prevent the staff from determining that the acceptance criteria are met, the staff will inform the Commission via memorandum of the staff's plan to make the 10 CFR 52.103(g) finding. This memorandum will be sent to the Commission at least three calendar days before the finding is made and will reference a publicly available document summarizing the staff's basis for the finding that all acceptance criteria are met. The staff will also include an updated table describing the current status of operational program inspections.

Once the staff makes the 10 CFR 52.103(g) finding, it will issue a *Federal Register* notice, as required by 10 CFR 2.106(a)(2), announcing the issuance of the finding and that the licensee is authorized to operate the facility. The staff will also send a letter to the licensee informing it of the finding.

## Enclosures:

1. Operational Program Inspection Status Table
2. Licensing Actions Status Table

cc: SECY  
EDO  
OGC  
OCA  
OPA  
CFO

SUBJECT: STATUS OF INSPECTIONS, TESTS, ANALYSES, AND ACCEPTANCE CRITERIA CLOSURE, AND INSPECTION AND LICENSING ACTIVITIES FOR VOGTLE ELECTRIC GENERATING PLANT, UNIT 3, DATED SEPTEMBER 24, 2020

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**ADAMS Accession No.: ML20183A090**

**\*via e-mail**

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Operational Program Inspection Status Table

Operational Program		Inspection Status	Scheduled or Actual Implementation Milestone	Inspection Report Number(s) (ADAMS Accession No.)
1	Inservice Inspection Program	Not Started (March 2021)	Prior to commercial service	N/A
2	Inservice Testing Program	Not Started (September/October 2020)	After generator online on nuclear heat <sup>(a)</sup>	N/A
3	Environmental Qualification Program	Partially Complete	Prior to initial fuel load	2016004 (ML18032A756), 2017001 (ML17132A345), 2017002 (ML17226A034), 2017004 (ML18094A897), 2018002 (ML18226A348)
4	Preservice Inspection Program	Partially Complete	Completion prior to initial plant start-up	2016004 (ML18032A756), 2017003 (ML17317A527), 2019001 (ML19135A691), 2019003 (ML19309D596), 2019004 (ML20042E292) 2020008 (ML20224A009)

5	Reactor Vessel Material Surveillance Program	Partially Complete	Prior to initial criticality	2017002 (ML17226A034)
6	Preservice Testing Program	Partially Complete	Prior to initial fuel load	2019004 (ML20042E292), 2020008 (ML20224A009)
7	Containment Leakage Rate Testing Program	Complete	Prior to initial fuel load	2020008 (ML20224A009)
8	Fire Protection Program	Partially Complete	Prior to receipt of fuel on site for buildings storing new fuel and adjacent fire areas. Prior to initial fuel load for other required elements.	2020009
	Fire Protection Program (portions applicable to radioactive material)	Partially Complete	Prior to initial receipt of byproduct, source, or special nuclear materials (excluding exempt quantities as described in 10 CFR 30.18)	2020009
9	Process and Effluent Monitoring and Sampling Program:	Partially Complete		2017004 (ML18094A897) 2020008 (ML20224A009)
	Radiological Effluent Technical Specifications/Standard Radiological Effluent Controls	Not Started (October/November 2020)	Prior to initial fuel load	N/A
	Offsite Dose Calculation Manual	Partially Complete	Prior to initial fuel load	2017004 (ML18094A897)

	Radiological Environmental Monitoring Program	Complete	Prior to initial fuel load	2017004 (ML18094A897) 2020008 (ML20224A009)
	Process Control Program	Not Started (October/November 2020)	Prior to initial fuel load	N/A
10	Radiation Protection Program (including as low as reasonably achievable principle)	Complete	Prior to initial receipt of byproduct, source, or special nuclear materials (excluding exempt quantities as described in 10 CFR 30.18)	2020008 (ML20224A009)
	Radioactive Source Control (assignment of Radiation Protection Supervisor)	Complete		
	Assignment of Radiation Protection Supervisor	Complete		
	Minimization of Contamination	Complete		
	Personnel Dosimetry	Complete	Prior to receipt of fuel on site	2020008 (ML20224A009)
	Radiation Monitoring and Surveys	Complete		
	Radiation Work Permits	Complete		
	Assignment of Radiation Protection Manager	Complete	Prior to initial fuel load	2020008 (ML20224A009)
	Respiratory Protection	Complete		
Bioassay	Complete			

	Effluents and Environmental Monitoring and Assessment	Complete		
	Job Coverage	Complete	Prior to initial fuel load	2020008 (ML20224A009)
	Radioactive Waste Shipping	Complete	Prior to first shipment of radioactive waste	2020008 (ML20224A009)
11	Non-Licensed Plant Staff Training Program	Complete	18 months prior to scheduled date of initial fuel load	2016002 (ML16210A448)
	(portions applicable to radioactive material)	Complete	Prior to initial receipt of byproduct, source, or special nuclear materials (excluding exempt quantities as described in 10 CFR 30.18)	2016002 (ML16210A448)
12	Reactor Operator Training Program	Complete	18 months prior to scheduled date of initial fuel load	2015301 (ML15113A028), 2020007 (ML20114E071), 2016002 (ML16210A448)
13	Reactor Operator Requalification Program	Complete	Within 3 months after the date the Commission makes the finding under 10 CFR 52.103(g)	2016002 (ML16210A448)
14	Emergency Planning	Complete	Full-participation exercise conducted within 2 years of scheduled date for initial loading of fuel *	2020008 (ML20224A009)

		Not Started (September 2020)	Onsite exercise conducted within 1 year before the scheduled date for initial loading of fuel	N/A
		Complete	Applicant's detailed implementing procedures for its emergency plan submitted at least 180 days prior to the scheduled date for initial loading of fuel	2020007 (ML20114E071)
15	Security Program	Partially Complete		2017001 (ML17132A345), 2018001 (ML18134A348), 2018002 (ML18226A348), 2019002 (ML19220B678), 2019004 (ML20042E292), 2020008 (ML20224A009) 2020009
	Physical Protection Program (applicable to protection of special nuclear material prior to the protected area being declared operational)	Not Started (September/October 2020)	Prior to initial receipt of special nuclear material	N/A
	Physical Security Program	Partially Complete	Prior to receipt of fuel on site (protected area)	2017001 (ML17132A345), 2018001 (ML18134A348),

				2018002 (ML18226A348), 2019002 (ML19220B678), 2019004 (ML20042E292), 2020008 (ML20224A009)
	Safeguards Contingency Program	Complete	Prior to receipt of fuel on site (protected area)	2019411 (ML20044C867)
	Training and Qualification Program	Not Started (August/September 2020)	Prior to receipt of fuel on site (protected area)	N/A
16	Quality Assurance Program – Operation	Partially Complete	Combined License issuance	2020008 (ML20224A009)
17	Maintenance Rule	Complete	Prior to fuel load authorization per 10 CFR 52.103(g)	2020007 (ML20114E071)
18	Motor-Operated Valve Testing	Not Started (August/September 2020)	Prior to initial fuel load	N/A
19	Initial Test Program	Partially Complete	Prior to the first preoperational test for the Preoperational Test Program	2019004 (ML20042E292), 2020007 (ML20114E071), 2020008 (ML20224A009) 2020009
		Not Started	Prior to initial fuel load for the Startup Test Program	N/A

20	Fitness-for-Duty Program for Construction (workers and first-line supervisors)	Partially Complete	Prior to initiating 10 CFR Part 26 construction activities	2010003 (ML102810444), 2011008 (ML112660577), 2012010 (ML12272A118), 2012011 (ML14290A358), 2014401 (ML14290A358), 2016403 (ML16302A420), 2018411 (ML18225A218), 2018413 (ML19031C931), 2019001 (ML19135A691)
	Fitness-for-Duty Program for Construction (management and oversight personnel)	Complete	Prior to initiating 10 CFR Part 26 construction activities	2010003 (ML102810444), 2011008 (ML112660577), 2012010 (ML12272A118), 2012011 (ML14290A358), 2014401 (ML14290A358), 2016403 (ML16302A420), 2018411 (ML18225A218), 2018413

				(ML19031C931), 2019001 (ML19135A691)
	Fitness-for-Duty Program for Security Personnel	Complete	<p>Prior to initiating 10 CFR Part 26 construction activities (source requirement: 10 CFR 26.4(e)(1)).</p> <p>Prior to the earlier of (1) licensee's receipt of special nuclear material in the form of fuel assemblies, (2) establishment of a protected area, or (3) the 10 CFR 52.103(g) finding (source requirement: 10 CFR 26.4(a)(5) or 26.4(e)(1)).</p>	2019411 (ML20044C867)
	Fitness-for-Duty Program for Fitness-for-Duty Program personnel	Complete	Prior to initiating 10 CFR Part 26 construction activities	2019411 (ML20044C867)
	Fitness-for-Duty Program for Persons Required to Physically Report to the Technical Support Center or Emergency Operations Facility	Complete	Prior to the conduct of the first full-participation emergency preparedness exercise under 10 CFR Part 50, Appendix E, Section F.2.a	2019411 (ML20044C867)
	Fitness-for-Duty Program for Operation	Complete	Prior to the earlier of (1) establishment of a protected area or (2) the 10 CFR 52.103(g) finding	2019411 (ML20044C867)

21	Cyber Security Program	Not Started (September 2020)	Prior to receipt of fuel on site (protected area)	N/A
22	Special Nuclear Material Control and Accounting Program	Complete	Prior to receipt of special nuclear material	2017401 (ML17135A132), 2018410 (ML18129A409), 2019401 (ML19220B358)
23	10 CFR Part 37 Physical Protection Program	Not Started (September/October 2020)	Prior to possession of aggregated Category 1 or Category 2 quantity of radioactive material	N/A

(a) The Inservice Testing Program will be fully implemented by generator online on nuclear heat. Appropriate portions of the program are implemented as necessary to support the system operability requirements of the technical specifications.

\* License Amendments 95 and 94 for Vogtle Electric Generating Plant Units 3 and 4, respectively, approved a change such that the Vogtle Electric Generating Plant Units 3 and 4 exercises will be partial-participation exercises. As permitted by 10 CFR Part 50, Appendix E, Section IV.F.2.a(iii), the full-participation exercise requirement will be satisfied by the biennial exercise conducted for Vogtle Electric Generating Plant Units 1 and 2.

Licensing Actions Status Table

Type of Licensing Action	Title	Required to Support 10 CFR 52.103(g) Finding	Licensee Requested Completion Date
License Amendment	Technical Specifications 3.3.13 for Main Control Room Emergency Habitability System Instrumentation Applicability Change and Include Undervoltage Actuation (LAR 20-003)	No	09/30/2020
License Amendment	Core Makeup Tank Boron Concentration Requirements (LAR 20-004)	No	10/23/2020
License Amendment	Vacuum Relief Valve Technical Specification Changes (LAR 20-005)	No	11/30/2020
License Amendment	License Amendment Request to Revise the Emergency Plan to Change Staffing and Extend Staff Augmentation Times for Emergency Response Organization Positions (This LAR applies to the the licensee's fleet comprised of Joseph M. Farley Nuclear Plant, Units 1 and 2; Edwin I. Hatch Nuclear Plant, Units 1 and 2; Vogtle Electric Generating Plant, Units 1 and 2; and Vogtle Electric Generating Plant, Units 3 and 4)	No	06/30/2021
Code Alternative	Request for Alternative: Requirements for Preservice Inspection Acceptance of Volumetric Examinations (PSI/ISI-ALT-14)	No	09/30/2020