

January 13, 2012

Mr. Joseph A. (Buzz) Miller
Executive Vice President
Southern Nuclear Operating Company
241 Ralph McGill Blvd
BIN 10232
Atlanta, GA 30308-3374

SUBJECT: RESPONSE TO SOUTHERN NUCLEAR OPERATING COMPANY'S LETTER ON
FIRST-PLANT-ONLY-TESTS AND FIRST-THREE-PLANT-ONLY-TESTS FOR
THE VOGTLE ELECTRIC GENERATING PLANT UNITS 3 AND 4

Dear Mr. Miller:

By letter dated December 12, 2011, Southern Nuclear Operating Company (SNC) informed the U.S. Nuclear Regulatory Commission (NRC) staff of its plan to utilize the results of First Plant Only Tests (FPOTs) and First Three Plants Only Tests (F3POTs) tests in China (Sanmen Units 1 & 2 and/or Haiyang Units 1 & 2) regarding FPOTs and F3POTs for SNC's Vogtle Electric Generating Plant (VEGP) Units 3 and 4. The SNC letter was a follow-up to a November 2, 2011, public meeting with the NRC staff held with SNC and Westinghouse Electric Company (WEC) regarding FPOTs and F3POTs for SNC's VEGP Units 3 and 4. The associated meeting summary is available in ADAMS under Accession Number ML113250838.

In its letter dated December 12, 2011, SNC indicated that the topical reports will be generated by WEC documenting the results of the testing and submitted to the NRC for approval. SNC would subsequently reference the approved report in a license amendment request. In its letter dated December 12, 2011, SNC also requested feedback from the NRC on the regulatory criteria, documentation and NRC interactions needed to allow crediting the results of the FPOT/F3POT tests to be performed in China for U.S. Plants.

In addition to the topics outlined in your letter as primary criteria to support these license amendment requests, including the protocol to be established for sharing test data and results, as well as access for the NRC staff to observe testing activities in China (also including the need to perform physical verifications prior to the testing), the NRC believes that the following topics, as a minimum, would also need to be addressed through topical reports submitted by WEC:

- Provide to the NRC staff copies of the quality assurance program, test control program, test specifications, and test procedures (which we understand are in English) for staff review.

- Validate the adequacy of the quality assurance program for construction and performance of the initial test program by providing a comparison of the quality assurance program implemented for the construction and initial test program at Sanmen Units 1 & 2 and Haiyang Units 1 & 2 to the quality assurance program as described in Section 17 of the FSAR for VEGP Units 3 and 4. This includes validating the adequacy of the quality assurance program for instrument calibration.
- Demonstrate the fidelity of the design, construction, and as-built condition of Sanmen Units 1 & 2 and Haiyang Units 1 & 2 to VEGP Units 3 and 4 in relation to the applicability of the FPOT/F3POT tests. This includes identifying any physical verification(s) that have been or will be performed.
- Validate the adequacy of the initial test program. This includes a description of the administrative controls governing the initial test program at Sanmen Units 1 & 2 and Haiyang Units 1 & 2, including a comparison to the administrative controls governing the initial test program as described in Section 14.2 of the FSAR for VEGP Units 3 and 4.
- Identify all the test critical parameters, calculations, and verification methods used during the initial test program. For calculated values this includes the calculated validation methodology, software verification and validation (when applicable), and the actual data inputs and outputs from the initial test results to support calculated values.
- Document the controls that WEC will have in place during the initial test program to ensure that work performed to non-English procedures or instructions are correctly translated from English.

The staff is amenable to continued dialogue in this area but it is imperative that the overall approach, schedule, and specific deliverables be firmly established as soon as possible so that the necessary resources can be identified.

Please contact Mr. Ravindra Joshi at (301) 415-6191 with any questions on this matter.

/RA/

David Matthews, Director
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-025 and 52-026

cc: See next page

- Validate the adequacy of the quality assurance program for construction and performance of the initial test program by providing a comparison of the quality assurance program implemented for the construction and initial test program at Sanmen Units 1 & 2 and Haiyang Units 1 & 2 to the quality assurance program as described in Section 17 of the FSAR for VEGP Units 3 and 4. This includes validating the adequacy of the quality assurance program for instrument calibration.
- Demonstrate the fidelity of the design, construction, and as-built condition of Sanmen Units 1 & 2 and Haiyang Units 1 & 2 to VEGP Units 3 and 4 in relation to the applicability of the FPOT/F3POT tests. This includes identifying any physical verification(s) that have been or will be performed.
- Validate the adequacy of the initial test program. This includes a description of the administrative controls governing the initial test program at Sanmen Units 1 & 2 and Haiyang Units 1 & 2, including a comparison to the administrative controls governing the initial test program as described in Section 14.2 of the FSAR for VEGP Units 3 and 4.
- Identify all the test critical parameters, calculations, and verification methods used during the initial test program. For calculated values this includes the calculated validation methodology, software verification and validation (when applicable), and the actual data inputs and outputs from the initial test results to support calculated values.
- Document the controls that WEC will have in place during the initial test program to ensure that work performed to non-English procedures or instructions are correctly translated from English.

The staff is amenable to continued dialogue in this area but it is imperative that the overall approach, schedule, and specific deliverables be firmly established as soon as possible so that the necessary resources can be identified.

Please contact Mr. Ravindra Joshi at (301) 415-6191 with any questions on this matter.

/RA/

David Matthews, Director
 Division of New Reactor Licensing
 Office of New Reactors

Docket Nos. 52-025 and 52-026

cc: See next page

DISTRIBUTION:

Public RidsNroDnrl TKendzia KKavanagh
 RidsNroLAKGoldstein JFuller AHodgdon RidsRgn2MailCenter
 RidsOgcMailCenter DMcGovern RidsAcrsAcnwMailCenter

ADAMS ACCESSION NO: ML120040121

NRO-002

OFFICE	DNRL/LB4/PM	LA:LB4	DCIP/CQAB	DCIP/CQAB/BC
NAME	RJoshi	KGGoldstein	TKendzia	KKavangh w/comments
DATE	01/04/2012	01/04/2012	01/10/2012	01/04/2012
OFFICE	NRO/DCIP/DD	DNRL/LB4/BC	OGC	DNRL/DD
NAME	LDudes	MTonacci	AHodgdon	DMatthews
DATE	01/05/2012	01/05/2012	01/06/2012	01/12/2012

OFFICIAL RECORD COPY

J. A. Miller
Vogtle Units 3 & 4 Mailing List

- 2 -

(Revised 11/16/2011)

cc:

Office of Attorney General
Law Department
132 Judicial Building
Atlanta, GA 30312

Resident Manager
Oglethorpe Power Corporation
Alvin W. Vogtle Nuclear Plant
7821 River Road
Waynesboro, GA 30830

Lucious Abram
Commissioner -
Burke's County Commissioner
P. O. Box 1626
Waynesboro, GA 30830

Anne F. Appleby
Oglethorpe Power Corporation
2100 East Exchange Place
Tucker, GA 30084

Ms. Michele Boyd
Legislative Director
Energy Program
Public Citizens Critical Mass Energy
and Environmental Program
215 Pennsylvania Avenue, SE
Washington, DC 20003

County Commissioner
Office of the County Commissioner
Burke County Commission
Waynesboro, GA 30830

Director
Consumer's Utility
Counsel Division
Governor's Office of Consumer Affairs
2 Martin Luther King, Jr. Drive
Plaza Level East, Suite 356
Atlanta, GA 30334-4600

Mr. James C. Hardeman
Environmental Radiation Program Manager
Environmental Protection Division
Georgia Dept. of Natural Resources
4220 International Pkwy, Suite 100
Atlanta, GA 30354-3906

Lisa Higdon
Southern Nuclear Op. Co.
Document Control Coordinator
42 Inverness Center parkway
Attn: B236
Birmingham, AL 35242

Rita Kilpatrick
250 Arizona Ave.
Atlanta, GA 30307

Stephen E. Kuczynski
Chairman, President and CEO
Southern Nuclear
P.O. Box 1295
Birmingham, AL 35201

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
Atlanta, GA 30334

Mr. Joseph A. (Buzz) Miller
Executive Vice President
Southern Nuclear Operating Company
241 Ralph McGill Blvd.
BIN 10240
Atlanta, GA 30308-3374

Resident Inspector
Vogtle Plant
8805 River Road
Waynesboro, GA 30830

J. A. Miller
Vogtle Units 3 & 4 Mailing List

- 2 -

Elaine Sikes
Burke County Library
130 Highway 24 South
Waynesboro, GA 30830

Mr. Jerry Smith
Commissioner
District 8
Augusta-Richmond County Commission
1332 Brown Road
Hephzibah, GA 30815

Gene Stilp
1550 Fishing Creek Valley Road
Harrisburg, PA 17112

Mr. Robert E. Sweeney
IBEX ESI
4641 Montgomery Avenue
Suite 350
Bethesda, MD 20814

George B. Taylor, Jr.
2100 East Exchange Pl
Atlanta, GA 30084-5336

Vogle Units 3 & 4 Mailing List

Email

agaughtm@southernco.com (Amy Aughtman)
agbaker@southernco.com (Ann Baker)
anfauk@southernco.com (Nicole Faulk)
APH@NEI.org (Adrian Heymer)
awc@nei.org (Anne W. Cottingham)
Bill.Jacobs@gdsassociates.com (Bill Jacobs)
blivey@southernco.com (Pete Ivey)
bob.masse@opc.com (Resident Manager)
bobbie@wand.org (Bobbie Paul)
BrinkmCB@westinghouse.com (Charles Brinkman)
bwwaites@southernco.com (Brandon Waites)
chmahan@southernco.com (Howard Mahan)
crpierce@southernco.com (C.R. Pierce)
cwaltman@roe.com (C. Waltman)
dahjones@southernco.com (David Jones)
danawill@southernco.com (Dana Williams)
david.hinds@ge.com (David Hinds)
david.lewis@pillsburylaw.com (David Lewis)
Derlinda.Bailey@chguernsey.com (Derinda Bailey)
dlfulton@southernco.com (Dale Fulton)
ed.burns@earthlink.net (Ed Burns)
enweathe@southernco.com (Beth Thomas)
erg-xl@cox.net (Eddie R. Grant)
G2NDRMC@southernco.com (SNC Document Control)
ghbuie@southernco.com (Gloria Buie)
james.beard@gene.ge.com (James Beard)
jamiller@southernco.com (Buzz Miller)
jbtomase@southernco.com (Janice Tomasello)
jenmorri@southernco.com (Jennifer Buettner)
jim.riccio@wdc.greenpeace.org (James Riccio)
jim@ncwarn.org (Jim Warren)
jlpember@southernco.com (John Pemberton)
Joseph_Hegner@dom.com (Joseph Hegner)
jrjohnso@southernco.com (Randy Johnson)
jtdavis@southernco.com (Jim Davis)
jtgasser@southernco.com (Jeffrey Gasser)
karen.patterson@ttnus.com (Karen Patterson)
kim.haynes@opc.com (Kim Haynes)
KSutton@morganlewis.com (Kathryn M. Sutton)
kwaugh@impact-net.org (Kenneth O. Waugh)
lchandler@morganlewis.com (Lawrence J. Chandler)
Marc.Brooks@dhs.gov (Marc Brooks)
maria.webb@pillsburylaw.com (Maria Webb)
mark.beaumont@wsms.com (Mark Beaumont)

Vogtle Units 3 & 4 Mailing List

Mark.Crisp@chguernsey.com (Mark Crisp)
matias.travieso-diaz@pillsburylaw.com (Matias Travieso-Diaz)
media@nei.org (Scott Peterson)
mike.price@opc.com (M.W. Price)
mike_moran@fpl.com (Mike Moran)
MSF@nei.org (Marvin Fertel)
nirsnet@nirs.org (Michael Mariotte)
nlhender@southernco.com (Nancy Henderson)
Nuclaw@mindspring.com (Robert Temple)
patriciaL.campbell@ge.com (Patricia L. Campbell)
Paul@beyondnuclear.org (Paul Gunter)
pbessette@morganlewis.com (Paul Bessette)
rhenry@ap.org (Ray Henry)
RJB@NEI.org (Russell Bell)
sabinski@suddenlink.net (Steve A. Bennett)
sandra.sloan@areva.com (Sandra Sloan)
sblanton@balch.com (Stanford Blanton)
sfrantz@morganlewis.com (Stephen P. Frantz)
sjackson@meagpower.org (Steven Jackson)
stephan.moen@ge.com (Stephan Moen)
steven.hucik@ge.com (Steven Hucik)
taterrel@southernco.com (Todd Terrell)
tcmoorer@southernco.com (Thomas Moorer)
Tom.Bilik@nrc.gov (Thomas Bilik)
tomccall@southernco.com (Tom McCallum)
Vanessa.quinn@dhs.gov (Vanessa Quinn)
Wanda.K.Marshall@dom.com (Wanda K. Marshall)
wasparkm@southernco.com (Wesley A. Sparkman)
whelmore@aol.com (Bill Elmore)