

POLICY ISSUE
(Notation Vote)

January 25, 2018

SECY-18-0013

FOR: The Commissioners

FROM: Victor M. McCree
Executive Director for Operations

SUBJECT: SOUTHERN NUCLEAR OPERATING COMPANY REQUEST TO RELOCATE
THE EXISTING COMMISSION-APPROVED CONSOLIDATED EMERGENCY
OPERATIONS FACILITY

PURPOSE:

The purpose of this paper is to request Commission approval of the license amendment request by the Southern Nuclear Operating Company (referred to hereafter as SNC) to relocate the consolidated emergency operations facility (EOF) for the Edwin I. Hatch Plant - Units 1 and 2 (Hatch), Joseph M. Farley Nuclear Plant - Units 1 and 2 (Farley), and Vogtle Electric Generating Plant - Units 1, 2, 3 and 4 (Vogtle) from the existing, Commission-approved, SNC Corporate Headquarters location in Birmingham, Alabama, to the new SNC Corporate Headquarters location, also in Birmingham, Alabama. Prior Commission approval is required since the proposed location is more than 25 miles from the Hatch, Farley and Vogtle sites. This paper does not address any new commitments or resource implications.

BACKGROUND:

An EOF provides a facility from which the licensee can manage the overall licensee emergency response during an event, including coordinating radiological and environmental assessments, determining protective actions, and communicating and coordinating with Federal, State and local agencies. This facility complements other licensee emergency response facilities, such as

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the technical support center, which is located onsite at each respective site and from which the licensee staff provides plant management and technical support to plant operations personnel during emergency conditions.

A listing of existing EOFs, located more than 25 miles from their respective nuclear power reactor site, is provided in Enclosure 1, "Commission-Approved Emergency Operations Facilities Located More Than 25 Miles From Respective Nuclear Power Reactor Site(s)."

DISCUSSION:

Request to Relocate the SNC Consolidated EOF

If a licensee desires to locate an EOF more than 25 miles from a nuclear power reactor site, prior Commission approval is required under paragraph IV.E.8.b of Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," to Part 50, "Domestic Licensing of Production and Utilization Facilities," of Title 10 of the *Code of Federal Regulations* (10 CFR).

In the Staff Requirements Memorandum to SECY-04-0236, "Southern Nuclear Operating Company's Proposal to Establish a Common Emergency Operating Facility at its Corporate Headquarters" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML050550131), the Commission approved the relocation of the near-site EOFs for Hatch, Farley and Vogtle, Units 1 and 2, into a consolidated EOF at the existing SNC Corporate Headquarters at 40 Inverness Center Parkway in Birmingham, Alabama. Subsequently, NUREG-1923, "Safety Evaluation Report for an Early Site Permit (ESP) at the Vogtle Electric Generating Plant (VEGP) ESP Site" (ADAMS Accession No. ML092290639), also established the existing SNC Corporate Headquarters as the future EOF location for Vogtle, Units 3 and 4, once completed.

By letter dated August 30, 2017 (ADAMS Accession No. ML17243A202), SNC requested Commission approval to relocate the consolidated EOF for Hatch, Farley and Vogtle from the existing SNC Corporate Headquarters to the new location for the SNC Corporate Headquarters at North Tower 3525 Colonnade Parkway in Birmingham, Alabama. The new proposed EOF location is a 1.3-mile straight-line distance from the current location.

Commission approval is required per Appendix E to 10 CFR Part 50, since the new facility would still be located more than 25 miles from the Hatch, Farley and Vogtle sites.

Staff Consideration

As part of its review process, the staff considered the applicable planning standards in 10 CFR 50.47(b) and the requirements of Appendix E of 10 CFR Part 50, using the guidance provided in NUREG-0696, "Functional Criteria for Emergency Response Facilities" (ADAMS Accession No. ML051390358), as supplemented by the Office of Nuclear Security and Incident Response (NSIR)/Division of Preparedness and Response (DPR) Interim Staff Guidance (ISG) document, NSIR/DPR-ISG-01, "Emergency Planning for Nuclear Power Plants," dated November 2011 (ADAMS Accession No. ML113010523). The staff's evaluation of the SNC proposal is discussed in detail in Enclosure 2, "Evaluation of Request to Relocate the Southern Nuclear Operating Company Consolidated Emergency Operations Facility."

CONCLUSION:

On the basis of its evaluation, the staff concludes that the proposed relocation of the SNC consolidated EOF would fulfill necessary emergency response functions and meet applicable regulations in 10 CFR 50.47 and Appendix E of 10 CFR Part 50, and the criteria as set forth in NUREG-0696, as supplemented by NSIR/DPR ISG-01. Given the technological capabilities of the proposed facility and its capacity to address multi-site events, and the staffing of an emergency response organization comprised of experienced and diverse personnel from the SNC corporate offices, the relocation of the EOF to the new SNC Corporate Headquarters would not impact the ability of the facility to continue to effectively support SNC's emergency response at all of the sites that the facility serves. The NRC staff finds that there is reasonable assurance that protective measures can and will be implemented in the event of a radiological emergency at any of the sites that the proposed EOF will serve.

RECOMMENDATIONS:

The staff recommends Commission approval of the proposed relocation of the SNC EOF.

COORDINATION:

The Office of the General Counsel reviewed this package and has no legal objection.

/RA/

Victor M. McCree
Executive Director
for Operations

Enclosures:
As stated

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ADAMS Accession No: ML17276B541 (**Package**) ML17277A289 (**SECY Paper**)

ML17277A289 (**Enclosure 1**) ML1717277A373 (**Enclosure 2**)

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