



# Hatch Pre-Submittal Meeting NFPA-805 Supplemental LAR

January 2021





## Meeting Purpose and Agenda

- Meeting purpose: Discuss proposed license amendment request (LAR) to supplement modifications described in Table S-2, “Plant Modifications Committed,” of SNC letter NL-19-1475, dated December 13, 2019
  - LAR will update Transition License Conditions for both units to refer to updated Table S-2
  - Updated Table S-2 will be submitted as part of LAR

### Agenda

- Issue Background
- Proposed LAR Content



# Issue Background



## Issue Background

- June 2020, NRC issued Amendments 304 and 249 to Hatch Units 1 and 2 Renewed Facility Operating License (RFOL) to adopt NFPA-805 performance-based standards
- Amendments contain Transition License Conditions that require SNC to implement modifications described in Table S-2 of December 13, 2019 SNC letter by the startup of the second refueling outage (for each unit) after issuance of NRC Safety Evaluation (SE)
  - Unit 2 = by startup of spring 2023 refueling outage 2R27
  - Unit 1 = by startup of spring 2024 refueling outage 1R31
  - Modifications will complete full compliance with 10 CFR 50.48(c)
  - Appropriate compensatory measures required until full compliance achieved



## Issue Background (continued)

- For equipment not affected by fire, NFPA-805 requires that a fire-induced cable failure on a separate load circuit supplied from the same power source would not affect this equipment
- Subsequent to issuance of Hatch NFPA-805 RFOL Amendments, additional breakers were discovered that lacked proper coordination
  - SNC currently finalizing extent of condition to ensure all breaker coordination issues are identified

The background features a complex arrangement of overlapping geometric shapes in various shades of gray. A large, light gray triangle is positioned on the left side, pointing towards the top-left corner. Another large, medium gray triangle is on the right side, pointing towards the bottom-right corner. These two triangles overlap in the center. Additionally, there are several smaller, darker gray shapes, including a vertical rectangle and a triangle, that intersect with the larger shapes, creating a layered, architectural effect.

# **Proposed License Amendment Request**



## Proposed License Amendment Request

LAR will generally follow format prescribed in NEI 06-02:

- 1.0 SUMMARY DESCRIPTION
  - 2.0 DETAILED DESCRIPTION
    - 2.1 Current Licensing Basis Requirements
    - 2.2 Reason for the Proposed Change
    - 2.3 Description of the Proposed Change
  - 3.0 TECHNICAL EVALUATION
  - 4.0 REGULATORY EVALUATION
    - 4.1 Applicable Regulatory Requirements / Criteria
    - 4.2 No Significant Hazards Consideration Determination Analysis
    - 4.3 Conclusions
  - 5.0 ENVIRONMENTAL CONSIDERATION
  - 6.0 REFERENCES
- ATTACHMENTS:
- M. License Condition Changes
  - S. Modification Items



## **1.0 Summary Description**

## **2.0 Detailed Description**

### 1.0 Summary Description

- Proposed change will revise Hatch Units 1 and 2 RFOL to reference updated Table S-2 for list of required modifications that must be implemented to achieve full compliance with NFPA-805
- Revised RFOL will specify the modifications are required by the startup of the Unit 2 spring 2023 refueling outage, U2R27, and by the startup of the Unit 1 spring 2024 refueling outage, U1R31

### 2.0 Detailed Description

#### 1. Current Licensing Basis Requirements

- Discuss current RFOL requirements

#### 2. Reason for Proposed Change

- Discuss that current Table S-2 referenced in RFOLs does not contain all required modifications to achieve compliance

#### 3. Description of Proposed Change

- Describe proposed marked-up changes to RFOLs





### 3.0 Technical Evaluation

- Discuss NRC SE conclusions that the SNC approach, methods, and data are acceptable to establish, implement, and maintain the proposed risk-informed performance based (RI/PB) fire protection plan (FPP) in accordance with 10 CFR 50.48(c), subject to the completion of the modifications identified in Table S-2 and the implementation items identified in Table S-3
  - 2001 Edition of NFPA-805 provides a comprehensive RI/PB standard for fire protection, and specifies minimum requirements for light-water reactors during all phases of plant operation
  - As discussed in Section C.2.1 of RG 1.205, Revision 1, when the NRC issues an NFPA-805 license amendment it will impose a license condition requiring the use of NFPA-805 along with an implementation schedule
  - Items identified in Table S-2 and S-3 were credited in LAR supporting analysis, and were relied upon by NRC staff in its review



### 3.0 Technical Evaluation (continued)

- Discuss NFPA-805 requirements for proper breaker coordination, and assumptions used in Fire PRA model
- Discuss that updated Table S-2 will not affect Fire PRA model
- Discuss that the amendment request will not impact the NFPA-805 modification schedule contained in the current RFOL to achieve full compliance with 10 CFR 50.48(c)



#### **4.0 Regulatory Evaluation**

#### **5.0 Environmental Considerations**

#### **6.0 References**

- Will use portions of original Hatch NFPA-805 LAR as appropriate to address these sections



## Attachment M License Condition Changes

The licensee shall implement the modifications described in Attachment S2, Table S-2, “Plant Modifications Committed,” of SNC letter ~~NL-19-1475~~ NL-21-XXXX, dated ~~December 13, 2019~~ Month, Day, 2021, to its facility to complete transition to full compliance with 10 CFR 50.48(c) by the startup of ~~the second refueling outage (for each unit) after the issuance of the NRC SE~~ Unit 2 refueling outage 2R27 (spring 2023) and Unit 1 refueling outage 1R31 (spring 2024). The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.

## Attachment S Modification Items



Will be consistent with Table S-2 referenced in current RFOs, with the inclusion of the additional required breaker coordination modifications



**Questions?**