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June 28, 2000

LCV 1259-C

Docket Nos. 50-424
50-425

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Ladies and Gentlemen:

**VOGTLE ELECTRIC GENERATING PLANT
PRESSURE AND TEMPERATURE LIMITS REPORT**

By letter (LCV 1259-A) dated August 26, 1999, Southern Nuclear Operating Company (SNC) made the following commitment related to the Cold Overpressure Protection System (COPS) and the Pressure and Temperature Limits Report (PTLR):

“SNC will revise the COPS enable temperature as part of the next update to the pressure and temperature limits for VEGP. By letter dated October 2, 1998, (LCV 1258) SNC projected submittal of the updated pressure and temperature limits for September 30, 1999. The updated pressure and temperature limits are currently projected for submittal in the first quarter of the year 2000.”

For both Units 1 and 2, the current pressure and temperature (P/T) limits are applicable for 16 effective full power years (EFPY). Based on the cumulative EFPY at the end of 1999, the Unit 1 limits will remain applicable for approximately another four EFPY, and the Unit 2 limits will remain applicable for approximately another six EFPY.

In November 1999, Westinghouse Electric Company LLC submitted a petition for rulemaking to revise NRC regulations (10 CFR 50, Appendix G) governing P/T limits to eliminate requirements for the metal temperature of the closure head flange and vessel flange regions. The NRC issued a draft change to 10CFR50, Appendix G in January 2000, with a comment period that expired in April 2000. We understand that all comments received have been in support of the change, so no conflicts are anticipated in the action. The prospect for elimination of the flange requirements offers increased operating margin for VEGP with respect to the P/T limits and the COPS setpoints. Additionally, the cost associated with calculation of the limits and setpoints and the revisions to the necessary licensing documents is considerable. It is our intent to propose new P/T limits and COPS setpoints that are effective for 36 EFPY. If we were to submit the new limits in the near term, the submittal would include the flange requirements or request an exemption. It is our understanding that

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the NRC staff would rather not entertain exemption requests related to the flange requirements while the petition for rulemaking is under consideration. Therefore, since the existing Unit 1 and Unit 2 P/T limits remain applicable for approximately the next four to six EFPY, respectively, SNC will delay submittal of new limits in anticipation of a favorable outcome regarding the petition for rulemaking. We will ensure that a timely submittal is made, allowing adequate NRC review time prior to the expiration of the existing P/T limits.

Sincerely,



J. B. Beasley, Jr.

JBB/NJS

cc: Southern Nuclear Operating Company
Mr. J. T. Gasser
Mr. M. Sheibani
SNC Document Management

U. S. Nuclear Regulatory Commission
Mr. L. A. Reyes, Regional Administrator
Mr. R. R. Assa, Project Manager, NRR
Mr. John Zeiler, Senior Resident Inspector, Vogtle