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SOUTHERN COMPANY
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December 27, 2001

LCV 1562-A

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
INSERVICE INSPECTION PROGRAM
WITHDRAWAL OF REQUEST FOR RELIEF RR-40

By letter LCV-1562 dated October 1, 2001, Southern Nuclear Operating Company (SNC) submitted Requests for Relief RR-40 and RR-41 for the Inservice Inspection Program for the Vogtle Electric Generating Plant (VEGP), Unit 1 and Unit 2. Both Requests for Relief pertained to volumetric examinations being conducted for VEGP to the requirements of the 1989 Edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI.

Request for Relief RR-40 sought NRC authorization for the use of ASME Section XI, Division 1, Code Case N-648, which provides alternative requirements for the examination of the inner radius of Class 1 reactor pressure vessel nozzles. Code Case N-648 allows for the performance of a VT-1 visual examination in lieu of the volumetric examination required by ASME Section XI Table IWB-2500-1, Examination Category B-D, Item Number B3.20 or Item Number B3.100, for the inservice examination of reactor vessel nozzles other than Boiling Water Reactor (BWR) feedwater nozzles and operational control rod drive return lines nozzles. As noted in RR-40, technical discussions took place between the NRC and Westinghouse on this industry issue in early 2000 and satisfactorily demonstrated to the NRC staff the examination capabilities and visual resolution (VT-3) of past examinations on the nozzle inside radius areas. As a result, the NRC staff indicated its acceptance for the elimination of the nozzle inner radius volumetric examinations provided that VT-1 visual examinations were performed on the applicable reactor pressure vessel nozzles. Similarly, because of the NRC's representation on the ASME Section XI Code committee, it was our understanding that the NRC found the alternative requirements of Code Case N-648 to be acceptable because the Code Case accurately reflects the conditions by which the volumetric examination may be eliminated provided that the VT-1 visual examination is performed.

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However, it is our understanding that in lieu of the VT-1 visual examination, the NRC expects a resolution sensitivity standard for remote in-vessel visual examinations using a 1/1000th inch (i.e., 1-mil) diameter wire with the intent that resolution of that magnitude would more readily detect cracking. It is our belief that imposition of the 1/1000th inch resolution sensitivity standard is unnecessary to detect the flaws of concern in a pressurized water reactor (PWR) environment like that at VEGP. If the nozzles in question were not low-alloy steel and the visual examination was for the purpose of identifying intergranular stress corrosion cracking (IGSCC)-like cracks, the 1/1000th inch resolution sensitivity standard for remote visual examinations may be warranted; however, low-alloy steel is not expected to experience such cracks. Therefore, due to changes in the technical requirements, SNC wishes to withdraw RR-40 from the NRC review and approval process.

As noted herein, Request for Relief RR-41, which provided alternative examination requirements for the examination of reactor pressure vessel studs, was also submitted as part of SNC letter LCV-1562. Pursuant to that letter, SNC still requests that the NRC review and approve RR-41 by February 1, 2002, in order to support planning efforts for the VEGP Unit 1 Spring 2002 maintenance/refueling outage.

Should there be any questions in this regard, please contact this office.

Sincerely,

J. B. Beasley, Jr.

JBB/BHW/JAE

cc: Southern Nuclear Operating Company
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