

April 16, 2004

MEMORANDUM TO: John A. Nakoski, Chief, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

FROM: Christopher Gratton, Sr. Project Manager, Section 1 /RA/  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

SUBJECT: VOGTLE ELECTRIC GENERATING STATION, UNITS 1 AND 2 -  
FACSIMILE TRANSMISSION OF DRAFT REQUEST FOR  
ADDITIONAL INFORMATION (TAC NOS. MC2227 AND MC2228)

Facsimiles containing questions were transmitted on March 31 and April 12, 2004, to Mr. Jack Stringfellow of the Southern Nuclear Operating Company. The questions will support a conference call with the licensee to be held in the near future regarding the licensee's submittal dated February 26, 2004. The licensee application proposed to revise the Technical Specification associated with the Pressure Temperature Limits Report and Reactor Coolant System vent size. This memorandum and the attached questions do not convey or represent an NRC staff position regarding the licensee's request.

Docket Nos. 50-424 and 50-425

Attachments:

1. Request for Additional Information sent 3/31/04
2. Request for Additional Information sent 4/12/04

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DATE	4/12/04	4/12/04	4/16/04

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**DRAFT**  
**REQUESTS FOR ADDITIONAL INFORMATION**  
**LICENSE AMENDMENT REQUEST**  
**REVISE PRESSURE-TEMPERATURE LIMITS AND RCS VENT SIZE**  
**SOUTERN NUCLEAR OPERATING COMPANY**  
**VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2**  
**DOCKET NUMBERS: 50-424 AND 50-425**

The staff has the following questions regarding your application dated February 26, 2004, "Request to Revise Technical Specifications and Pressure Temperature Limits Report."

1. Regarding the pressure vessel fluence methodology in the Pressure Temperature Limits Report (PTLR), WCAP-14040A Rev. 4 is referenced, but it is not sufficient because it uses BUGLE-93 which is no longer in use (currently BUGLE-96 is used). Please reference an acceptable pressure vessel fluence methodology.
2. Generic Letter (GL) 96-03 states that the PTLR should reference RG 1.190, which describes methodologies that the NRC staff accepts for vessel fluence calculations. In Technical Specification (TS) Section 5.6.6, please reference RG 1.190 and WCAP-15067 and WCAP-15159 which are the sources of your fluence values used in the calculation of the PT curves. In total these references define your methodology.
3. Please identify the calculations you performed that justify lowering the minimum Reactor Coolant System vent size from 2.4 inch<sup>2</sup> to 1.5 inch<sup>2</sup>.

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The licensee is proposing to change Technical Specification (TS) 5.6.6.c, regarding the Reactor Coolant System Pressure-Temperature limits Report (PTLR),” to adopt wording similar to the Standard Technical Specifications (STS) (changing from listing license amendment number and date of issuance to approved topical reports with no date, just report number and title). This change is consistent with the STS. However, the STS contains a reviewers note that states: "Identify the Topical Report(s) by number and title or identify the Nuclear Regulatory Commission (NRC) Safety Evaluation report for a plant specific methodology by NRC letter and date. The PTLR will contain the complete identification for each of the TS referenced Topical Reports used to prepare the PTLR (i.e., report number, title, revision, date, and any supplements)."

Reference 1 in the proposed PTLR does not contain the complete information requested in the TS reviewers note. Therefore, the proposed PTLR should be revised. In addition, the staff has been requesting licensees to include the following statement in TS 5.6.6.c when adopting the STS format: "The PTLR will contain the complete identification for each of the TS referenced Topical Reports used to prepare the PTLR (i.e., report number, title, revision, date, and any supplements)."

The staff believes that this statement is necessary to reinforce the requirement that only Topical Reports reviewed and approved by the NRC can be used to generate the PTLR. Since the complete citation of the Topical Report is not listed in TS 5.6.6, the complete citation should be listed in the PTLR and a statement documenting this fact should be in TS 5.6.6.c.