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Docket Nos.: 50-424  
50-425

NL-05-0073

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555-0001

Vogtle Electric Generating Plant  
Request to Use the 1995 Edition of ASME Section XI When  
Performing Steam Generator Tube Plugging Using Fusion Welding

Ladies and Gentlemen:

On October 19, 2004, the NRC issued Regulatory Issue Summary (RIS) 2004-16, "Use of Later Editions and Addenda to ASME Section XI for Repair/Replacement Activities." The RIS clarified that repair, replacement, and modification of plant components is not separate and distinct, but is included in inservice examinations. Therefore, the requirements of 10 CFR 50.55a(g)(4)(iv) are applicable, and licensees are required to submit a written request for approval to use later editions or addenda of the Section XI Code that have been incorporated by reference into 10 CFR 50.55a. The licensee may request this approval by submitting a letter to the NRC Document Control Desk. The RIS further clarified that the licensee must receive approval from the NRC prior to use of the later editions or addenda.

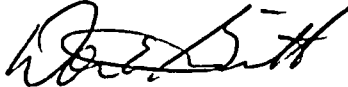
The Inservice Inspection (ISI) code of record for Vogtle Electric Generating Plant (VEGP) Units 1 and 2 for the second 10-year ISI intervals is the 1989 Edition of the Section XI Code. The second 10-year ISI intervals for VEGP Units 1 and 2 run from May 30, 1997 through May 29, 2007. Prior to the issuance of the RIS, in the VEGP Unit 2 second 10-year ISI interval, spring 2004 maintenance/refueling outage, VEGP Unit 2 performed fusion welding on steam generator tube plugs using the 1995 Edition of ASME Section XI Code, Subarticle IWA-4412, "Fusion Welding." The 1995 Edition of ASME Section XI Code had been incorporated by reference in 10 CFR 50.55a by the NRC. The VEGP position prior to the RIS clarification was that this incorporation constituted prior NRC approval of the use of the edition and IWA-4412 provided an acceptable alternative to the requirements of the VEGP code of record, Subarticle IWB-4230, "Tube or Tubesheet Hole Plugging by Fusion Welding." However, even though the use of IWA-4412 provides an acceptable alternative to IWB-4230, the RIS clarification clearly specifies that prior NRC approval is required in order to use the later code edition.

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Therefore, pursuant to 10 CFR 50.55a(g)(4)(iv), Southern Nuclear Operating Company hereby requests the use of the 1995 Edition of ASME Section XI Code, Subarticle IWA-4412 and all the related Code requirements when performing steam generator tube or tubesheet hole plugging by fusion welding at VEGP Units 1 and 2 for the remainder of their respective second 10-year ISI intervals.

This letter contains no NRC commitments. If you have any questions, please advise.

Sincerely,



Don E. Grissette

DEG/DRG/daj

cc: Southern Nuclear Operating Company  
Mr. J. T. Gasser, Executive Vice President  
Mr. W. F. Kitchens, General Manager – Plant Vogtle  
RType: CVC7000

U. S. Nuclear Regulatory Commission  
Dr. W. D. Travers, Regional Administrator  
Mr. C. Gratton, NRR Project Manager – Vogtle  
Mr. G. J. McCoy, Senior Resident Inspector – Vogtle