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August 24, 2005

Docket Nos.: 50-321  
50-366

NL-05-1493

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

Edwin I. Hatch Nuclear Plant  
Third and Fourth 10-Year Interval Inservice Inspection Programs  
Submittal of Revised Exemption Request

Ladies and Gentlemen:

By letter dated August 2, 2005, Southern Nuclear Operating Company (SNC) submitted a revision to Enclosure 9 of the letter dated March 30, 2005 (Exemption Request ISI-EX-01, Version 2). In response to a telephone conversation with the NRC staff on August 16, 2005, this enclosure has been revised to indicate the special circumstance of 10 CFR 50.12(a)(2) to which the exemption request applies.

In accordance with 10 CFR 50.12(a)(1) and pursuant to the special circumstance described in 10 CFR 50.12(a)(2)(ii), SNC requests an exemption from 10 CFR 50.55a(b)(2)(ix)(G) requirements for VT-3 examination of the containment vent system. As described in the Enclosure, application of the regulation in this particular circumstance is not necessary to achieve the underlying purpose of the rule. SNC proposes to continue to use the method established by Third 10-Year Interval Relief Request RR-MC-9 to implement the visual requirements.

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

Sincerely,

A handwritten signature in cursive script that reads "H. L. Sumner, Jr.".

H. L. Sumner, Jr.

HLS/ifl/sdl

Enclosure 9 (Replacement): ISI-EX-01, Version 3.0

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cc: Southern Nuclear Operating Company  
Mr. J. T. Gasser, Executive Vice President  
Mr. G. R. Frederick, General Manager – Plant Hatch  
RTYPE: CHA02.004

U. S. Nuclear Regulatory Commission  
Dr. W. D. Travers, Regional Administrator  
Mr. C. Gratton, NRR Project Manager – Hatch  
Mr. D. S. Simpkins, Senior Resident Inspector – Hatch

**Enclosure 9**  
**SOUTHERN NUCLEAR OPERATING COMPANY**  
**ISI-EX-01, Version 3.0**  
**10 CFR 50.55a EXEMPTION REQUEST**

**Plant Site-Unit:** Edwin I. Hatch Nuclear Plant-Units 1 and 2

**Interval-Interval Dates:** 4<sup>th</sup> ISI Interval extending from January 1, 2006 through December 31, 2015.

**Requested Date for Approval:** Approval is requested by November 1, 2005 to support examinations performed during 1R22 (scheduled for February 2006)

**ASME Code Components Affected:** Accessible surface areas of the Containment Vessel pressure retaining boundary Vent System, requiring visual examination per ASME Section XI, Table IWE-2500-1, Category E-A, Item Number E1.20.

**Applicable Code Edition and Addenda:** ASME Section XI, 2001 Edition through the 2003 Addenda

**Applicable Requirements:** 10 CFR 50.55a(b)(2)(ix)(G) requires a VT-3 examination of components in IWE Table 2500-1, Category E-A, Item E1.20 in lieu of the ASME Section XI required General Visual Examination (CFR dated October 4, 2004).

**Reason for Request:** During the 3<sup>rd</sup> inservice inspection interval, the 1992 Code with 1992 Addenda required a VT-3 examination of the accessible surface areas of the vent system. SNC requested approval in Relief Request RR-MC-9 to use a General Visual examination in lieu of the VT-3 examination. This request was approved by the NRC. For the 4<sup>th</sup> interval, the 2001 Edition through the 2003 Addenda does not require the VT-3 examination; however in 10 CFR 50.55a(b)(2)(ix)(G), the NRC added a requirement to perform the VT-3 examinations.

SNC believes that the examination provisions established in previous Relief Request RR-MC-9 have proven to be sufficient to maintain the structural integrity and leak-tightness of the containment surfaces; therefore, SNC is requesting to continue the use of similar provisions during the 4<sup>th</sup> interval.

See References for dates and TAC numbers associated with RR-MC-9.

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**Proposed  
Alternative and  
Basis for Use:**

In lieu of conducting the 10CFR50.55a(b)(2)(ix)(G) required visual examination (VT-3), SNC proposes to perform a general visual type examination on all non-submerged, accessible pressure boundary surfaces of the vent system. This general visual type examination will be performed in accordance with the Plant Hatch "Qualified (N) Coatings" program. The details of this program were provided in the October 19, 1998 response to NRC Generic Letter 98-04, "Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System After a Loss-of-Coolant Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in Containment." The procedures and personnel qualifications applicable for the coatings program implementation are in compliance with Regulatory Guide 1.54, 1973, and the implementation is based on the following documents: (1) ANSI N101.2-1972, "Protective Coatings (Plants) for Light Water Nuclear Reactor Containment Facilities;" (2) ANSI N101.4-1972, "Quality Assurance for Protective Coatings Applied to Nuclear Facilities;" and (3) EPRI Report TR-109937, "Guideline on Nuclear Safety-Related Coatings." This program was approved by the NRC in a letter dated November 19, 1999.

The "Qualified (N) Coatings" program examination frequency is equivalent to that of the ASME XI Code and the program requires that when evidence of degradation is detected, a detailed examination and evaluation be performed. The detailed visual examination would be performed in accordance with the provisions of ASME XI paragraph IWE-2310(c).

The exterior surfaces of the Vent System that connects the BWR Drywell to the Suppression Pool are located in the Reactor Building. The Reactor Building environment does not pose adverse conditions that would promote rapid degradation of the outside pressure boundary surfaces of the Vent System. The interior surfaces of the Vent System that connects the Drywell to the suppression pool and the portions of the vent system located inside the Suppression Pool are maintained in a nitrogen inerted environment during normal power operation in accordance with Technical Specification requirements. History and previous examinations have indicated that this environment does not promote rapid degradation of the surfaces.

The requirements specified for a VT-3 were developed for detecting flaws in metal components and are more stringent than those required for detection of degradation such as corrosion. Since corrosion of base metal is the primary issue of concern for containment pressure boundary surface areas, a general visual type examination, in accordance with the site "Qualified (N) Coatings" program, is sufficient to inspect the subject surface areas of the containment and will provide an acceptable level of quality and safety. Therefore, SNC hereby requests an exemption from the requirements of 10CFR50.55a (b)(2)(ix)(G) pursuant to 10 CFR 50.12(a)(1) and 10 CFR 50.12(a)(2)(ii) since granting the exemption will not present an undue risk to the public

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health and safety, and the application of the regulation in this particular circumstance is not necessary to achieve the underlying purpose of the rule.

**Duration of  
Proposed  
Alternative:**

The proposed exemption is applicable for the 4<sup>th</sup> Inservice Inspection Interval.

**Precedents:**

A similar request was approved for the 3<sup>rd</sup> Inservice Inspection Interval as RR-MC-9.

**References:**

SNC letter HL-5957, dated July 19, 2000 submitting RR-MC-9.

Approval for RR-MC-9 was granted for the 3<sup>rd</sup> Interval by NRC letter dated October 04, 2000 - TAC numbers MA9569 and MA9570.

**Status:**

Awaiting NRC approval.