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50-425

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

Vogtle Electric Generating Plant
Request for Technical Specification Amendment
Containment Tendon Surveillance Program

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 50.90, Southern Nuclear Operating Company (SNC) is submitting a request for an amendment to the Technical Specifications (TS) for Vogtle Electric Generating Plant (VEGP), Units 1 and 2.

The proposed amendment will revise VEGP TS section 5.5, "Programs and Manuals," section 5.6, "Reporting Requirements," and TS Bases for LCO 3.6.1, "Containment," relative to references of the VEGP Containment Tendon Surveillance Program in order to reflect the latest requirements for tendon surveillance. The proposed changes are a result of the NRC issuing a final rule amending 10 CFR 50.55a, "Codes and Standards," which incorporated by reference the 1992 Edition with the 1992 Addenda of Subsection IWE, "Requirements for Class MC and Metallic Liners of Class CC Components of Light-Water Cooled Plants," and Subsection IWL, "Requirements for Class CC Concrete Components of Light-Water Cooled Plants," of Section XI, Division 1, of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code). By letter dated March 17, 2004, the NRC issued a similar amendment to Facility Operating License No. NPF-42 for the Wolf Creek Generating Station.

In addition, the proposed amendment is consistent with NRC-approved Revision 1 to TSTF-343, "Containment Structural Integrity." Revision 1 to TSTF-343 was considered by the NRC to be an administrative update and was incorporated into Revision 3.1 to the Standard Technical Specifications (STS) in December 2005.

Enclosure 1 provides the basis for the proposed TS change. Enclosure 2 provides the marked-up TS and TS Bases pages. Enclosure 3 provides the clean-typed TS and TS Bases pages.

SNC requests approval of the proposed license amendment by March 2007, with the amendment being implemented within 90 days of issuance of the amendment.

Mr. D. E. Grissette states he is a Vice President of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and to the best of his knowledge and belief, the facts set forth in this letter are true.

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

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



Don E. Grissette

Sworn to and subscribed before me this 29th day of March, 2006.


Notary Public

My commission expires: 11/10/06

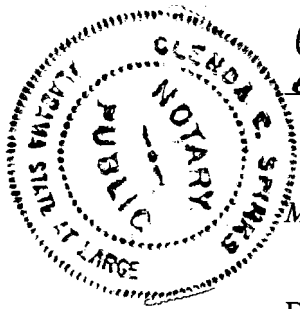
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- Enclosures: 1. Basis for the Proposed Change
2. Marked-Up Technical Specifications and Bases Pages
3. Clean-Typed TS and TS Bases Pages

cc: Southern Nuclear Operating Company
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Enclosure 1

Basis for the Proposed Change

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Enclosure 1

Basis for the Proposed Change

1.0 Description

The proposed change will revise Vogtle Electric Generating Plant (VEGP) Units 1 and 2 Technical Specifications (TS) 5.5, "Programs and Manuals," TS 5.6, "Reporting Requirements," and TS Bases for LCO 3.6.1, "Containment," to reflect the latest requirements for tendon surveillance. The proposed changes are a result of the NRC issuing a final rule amending 10 CFR 50.55a that affected the surveillance methods for the containment tendons and the conduct of containment visual inspections, and the methods of reporting the results of the required inspections to the NRC. These revised provisions were required to be implemented by September 9, 2001. VEGP fully implemented these provisions on August 6, 2000.

The requirements of Regulatory Guide 1.35, Revision 2 with the exceptions referenced in TS 5.5.6 are included in ASME Code Section XI, Subsection IWL as modified by 10 CFR 50.55a(b)(2)(viii) and the VEGP Unit 1 and Unit 2 Containment Inservice Inspection Program Plan. As such, the TS requirements do not conflict with the requirements of 10 CFR 50.55a(g)(4). Therefore, based on the requirements in 10 CFR 50.55a(g)(5)(ii), VEGP is not required to update the TS. However, the proposed amendment is consistent with NRC-approved Revision 1 to TSTF-343, "Containment Structural Integrity." Revision 1 to TSTF-343 was considered by the NRC to be an administrative update and was incorporated into Revision 3.1 to the Standard Technical Specifications (STS) in December 2005. Therefore, to maintain consistency between the VEGP TS, the STS, and the VEGP Unit 1 and Unit 2 Containment Inservice Inspection Program Plan, SNC is proposing the TS update.

2.0 Proposed Change

The following change (in italics) is proposed for the last sentence of the first paragraph in TS section 5.5.6, "Pre-Stressed Concrete Containment Tendon Surveillance Program:"

"The Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with Section XI, Subsection IWL of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10 CFR 50.55a, except where an exemption, relief, or alternative has been authorized by the NRC."

In addition, a deletion of the three exceptions and the paragraph following the exceptions is proposed since these are contained in NRC approved alternatives to the ASME Code contained in the VEGP Unit 1 and Unit 2 Containment Inspection Program Plan. Also, since the tendon inspection frequencies will be in accordance

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with ASME Section XI, Subsection IWL, the provisions of SR 3.0.2 are no longer applicable; therefore, deletion of the provisions of SR 3.0.2 from TS 5.5.6 is also proposed. 10 CFR 50.55a requires the implementation of ASME Section XI, Subsection IWL and specifies the requirements for extending inspection frequencies.

Therefore, since reporting requirements for the Tendon Surveillance Report will be in accordance with the reporting requirements in 10 CFR 50.55a, deletion of the provisions of TS 5.6.9 is also proposed. Repeating the Federal Regulations within the TS is not necessary to ensure safe operation of the plant. Therefore, the deletion of this TS requirement is acceptable.

The following change (in italics) is proposed for the third exception in TS section 5.5.17, "Containment Leakage Rate Program:"

"The visual examination of containment concrete surfaces intended to fulfill the requirements of 10 CFR 50, Appendix J, Option B testing, will be performed in accordance with the requirements of and frequency specified by ASME Section XI Code, Subsection IWL, except where relief or alternative has been authorized by the NRC."

In addition, a deletion of Figure 5.5.6-1 is proposed since the lift-off testing schedule is per an NRC approved alternative contained in the Unit 1 and Unit 2 Containment Inservice Inspection Program Plan.

The following change (in italics) is proposed for the last sentence in TS Bases for LCO 3.6.1, "Containment," SR 3.6.1.1:

"The containment concrete visual examinations may be performed during either power operation, e.g., performed concurrently with other containment inspection-related activities such as tendon testing, or during a maintenance/refueling outage. The visual examinations of the steel liner plate inside containment are performed during maintenance or refueling outages since this is the only time the liner plate is fully accessible."

The following change (in italics) is proposed for the last sentence in TS Bases for LCO 3.6.1, "Containment," SR 3.6.1.2:

"Testing and Frequency are in accordance with Section XI, Subsection IWL of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10 CFR 50.55a, except where an exemption, relief, or alternative has been authorized by the NRC (Ref. 4)."

The following change (in italics) is proposed for TS Bases for LCO 3.6.1, "Containment," in the "References" section:

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Revise reference #4 to: Section XI, Subsection IWL of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10 CFR 50.55a.

The current TS and TS Bases refer to Regulatory Guide 1.35, Revision 2.

3.0 Background

On January 7, 1994, the Nuclear Regulatory Commission (NRC) published a proposed amendment to the regulations to incorporate by reference the 1992 Edition with the 1992 Addenda of Subsections IWE and IWL of Section XI, Division I of the ASME Boiler and Pressure Vessel Code. The final rule, Subpart 50.55a(g)(6)(ii)(B) of Title 10 of the Code of Federal Regulations, became effective on September 9, 1996, and required licensees to implement Subsections IWE and IWL, with specified modifications and limitations, by September 9, 2001. The revised regulation contains several modifications and supplemental requirements that affect implementation of the ASME Section XI, IWE, and IWL requirements. 10 CFR 50.55a(g)(4) requires licensees to update their containment inservice inspection requirements in accordance with Subsections IWE and IWL of Section XI, Division I of the ASME Boiler and Pressure Vessel Code as limited by 10 CFR 50.55a(b)(2)(vi) and modified by 10 CFR 50.55a(b)(2)(viii) and 10 CFR 50.55a(b)(2)(ix).

On February 10, 1999, SNC updated the VEGP Unit 1 and Unit 2 Containment Inservice Inspection Program Plan describing how IWE and IWL, as modified by 10 CFR 50.55a and any exemptions, requests for relief, or alternatives approved by the NRC, would be implemented by the required date of September 9, 2001.

Since August 6, 2000, VEGP has satisfied both the containment inservice inspection requirements described in the VEGP Unit 1 and Unit 2 Containment Inservice Inspection Program Plan and the containment inservice inspection requirements described in VEGP Unit 1 and Unit 2 TS.

The requirements of Regulatory Guide 1.35, Revision 2 with the exceptions referenced in TS 5.5.6 are included in VEGP Unit 1 and Unit 2 Containment Inspection Program Plan. There is not a conflict between the TS and the Containment Inspection Program Plan, however, SNC is proposing the TS update to maintain consistency.

Additionally, since the tendon inspection frequencies will be in accordance with ASME Section XI, Subsection IWL, the provisions of SR 3.0.2 are no longer applicable and are deleted from TS 5.5.6. As discussed in the TS Bases for SR 3.0.2, the requirements of regulations take precedence over the TS. As such, 10 CFR 50.55a requires the implementation of ASME Section XI, Subsection IWL and specifies the requirements for extending inspection frequencies.

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The scope of this proposed change updates the TS and TS Bases to reflect the latest requirements of the Containment Tendon Surveillance Program that VEGP has incorporated into its ISI program.

4.0 Regulatory Analysis

No Significant Hazards Consideration

The proposed change revises the VEGP Units 1 and 2 TS 5.5, "Programs and Manuals," TS 5.6, "Reporting Requirements," and TS Bases for LCO 3.6.1, "Containment," to reflect the latest requirements for tendon surveillance. Since the tendon inspection frequencies will be in accordance with American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (ASME Code) Section XI, Subsection IWL, the provisions of SR 3.0.2 are no longer applicable and are deleted from TS 5.5.6. 10 CFR 50.55a requires the implementation of ASME Section XI, Subsection IWL and specifies the requirements for extending inspection frequencies.

Since reporting requirements are contained in 10 CFR 50.55a, deletion of the provisions of TS 5.6.9 is proposed. Repeating the Federal Regulation within the TS is not necessary to ensure safe operation of the plant. Therefore, the deletion of this TS requirement is acceptable. Also, one editorial change in the TS is proposed.

SNC has evaluated whether or not a significant hazards consideration is involved with the proposed change by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

1. The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change replaces the current TS requirement to implement a Containment Tendon Surveillance Program based on Regulatory Guide 1.35, Rev. 2, with a Containment Inspection Program Plan that complies with the current requirements of 10 CFR 50.55a. This regulation requires licensees to implement a Containment Inspection Program Plan in compliance with the 1992 Edition with the 1992 Addenda of Subsection IWE, "Requirements for Class MC and Metallic Liners of Class CC Components of Light-Water Cooled Plants," and with Subsection IWL, "Requirements for Class CC Concrete Components of Light-Water Cooled Plants," of Section XI, Division 1, of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) with additional modifications and limitations as stated in 10 CFR 50.55a(b)(2)(ix). SNC has implemented a Containment Inspection Program Plan that complies with the regulatory requirements. This proposed TS amendment is requested to update the TS to the latest 10 CFR 50.55a regulatory requirements.

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In addition, reporting requirements that are redundant to existing regulations are deleted, minor editorial changes are made, and the applicability of SR 3.0.2 to the tendon surveillance program is deleted since surveillance frequencies and associated extensions are specified in ASME Section XI, Subsection IWL.

By complying with the regulatory requirements described in 10 CFR 50.55a, the probability of a loss of containment structural integrity is maintained as low as reasonably achievable. Maintaining containment structural integrity as described in the revised Containment Inspection Program Plan does not impact the operation of the reactor coolant system (RCS), containment spray (CS) system, or emergency core cooling system (ECCS). The Containment Inspection Program ensures that the containment will function as designed to provide an acceptable barrier to release of radioactive materials to the environment. The proposed change does not alter or prevent the ability of structures, systems, and components (SSCs) from performing their intended function to mitigate the consequences of an initiating event within the assumed acceptance limits.

The proposed change does not impact any accident initiators or analyzed events, nor does it impact the types or amounts of radioactive effluent that may be released offsite. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed license amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Maintaining containment structural integrity does not impact the operation of the RCS, CS system, or ECCS. The proposed change does not involve a modification to the physical configuration of the plant or a change in the methods governing normal plant operation. The proposed change does not introduce a new accident initiator, accident precursor, or malfunction mechanism. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed license amendment does not involve a significant reduction in a margin of safety.

By complying with the regulatory requirements described in 10 CFR 50.55a, the probability of a loss of containment structural integrity is maintained as low as reasonably achievable. The Containment Inspection Program Plan ensures that the containment will function as designed to provide an acceptable barrier to release of radioactive materials to the environment. The proposed change does not adversely affect plant operation or existing safety analyses. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

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5.0 Environmental Considerations

SNC has reviewed the proposed change pursuant to 10 CFR 50.92 and determined that it does not involve a significant hazards consideration. In addition, there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite, and there is no significant increase in individual or cumulative occupational radiation exposure. Consequently, the proposed TS change has no significant effect on the human environment and satisfies the criteria of 10 CFR 51.22 for categorical exclusion from the requirements for an environmental assessment.

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Enclosure 2

Marked-Up Technical Specifications and Bases Pages

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5.5 Programs and Manuals

5.5.6 Prestressed Concrete Containment Tendon Surveillance Program

This program provides controls for monitoring any tendon degradation in prestressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The program shall include baseline measurements prior to initial operations. The Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with ~~Regulatory Guide 1.35, Revision 2, 1976, with the following exceptions:~~ Section XI, Subsection IWL of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10 CFR 50.55a except where an exemption, relief, or alternative has been authorized by the NRC.

~~1. Number of Tendons Detensioned — Only one vertical and one horizontal tendon are detensioned on Unit 1 each time lift-offs are performed on Unit 1 per figure 5.5.6-1. Only one vertical or one horizontal tendon is detensioned on Unit 1 each time lift-offs are performed on Unit 2 per figure 5.5.6-1.~~

~~2. Concrete Inspection — The concrete adjacent to the vertical tendons cannot be inspected due to steel plating covering the concrete.~~

~~3. The areas adjacent to the tendons are inspected during the tendon surveillance instead of during the ILRT.~~

~~Only the Unit 1 containment is subject to the complete surveillance program. Unit 1 is equipped with selected tendons specifically designed for detensioning. The Unit 2 containment has permanent anchorage assemblies (nondetensionable).~~

The provisions of ~~SR 3.0.2 and~~ SR 3.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.

5.5.7 Reactor Coolant Pump Flywheel Inspection Program

This program shall provide for the inspection of each reactor coolant pump flywheel at least once per 10 years by conducting either:

- a. An in-place ultrasonic examination over the volume from the inner bore of the flywheel to the circle of one-half the outer radius; or
- b. A surface examination (magnetic particle and/or liquid penetrant) of exposed surfaces of the disassembled flywheel.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Reactor Coolant Pump Flywheel Inspection Program.

(continued)

5.5 Programs and Manuals (continued)

5.5.17 Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Testing Program," dated September 1995, as modified by the following exceptions:

1. Leakage rate testing for containment purge valves with resilient seals is performed once per 18 months in accordance with LCO 3.6.3, SR 3.6.3.6 and SR 3.0.2.
2. Containment personnel air lock door seals will be tested prior to reestablishing containment integrity when the air lock has been used for containment entry. When containment integrity is required and the air lock has been used for containment entry, door seals will be tested at least once per 30 days during the period that containment entry(ies) is (are) being made.
3. The visual examination of containment concrete surfaces intended to fulfill the requirements of 10 CFR 50, Appendix J, Option B testing, will be performed in accordance with the requirements of and frequency specified by ASME Section XI Code, Subsection IWL, except where relief or alternative has been authorized by the NRC. At the discretion of the licensee, the containment concrete visual examinations may be performed during either power operation, e.g., performed concurrently with other containment inspection-related activities such as tendon testing, or during a maintenance/refueling outage.
4. A one time exception to NEI 94-01, Rev. 0, "Industry Guidelines for Implementing Performance-Based Option of 10 CFR 50, Appendix J":

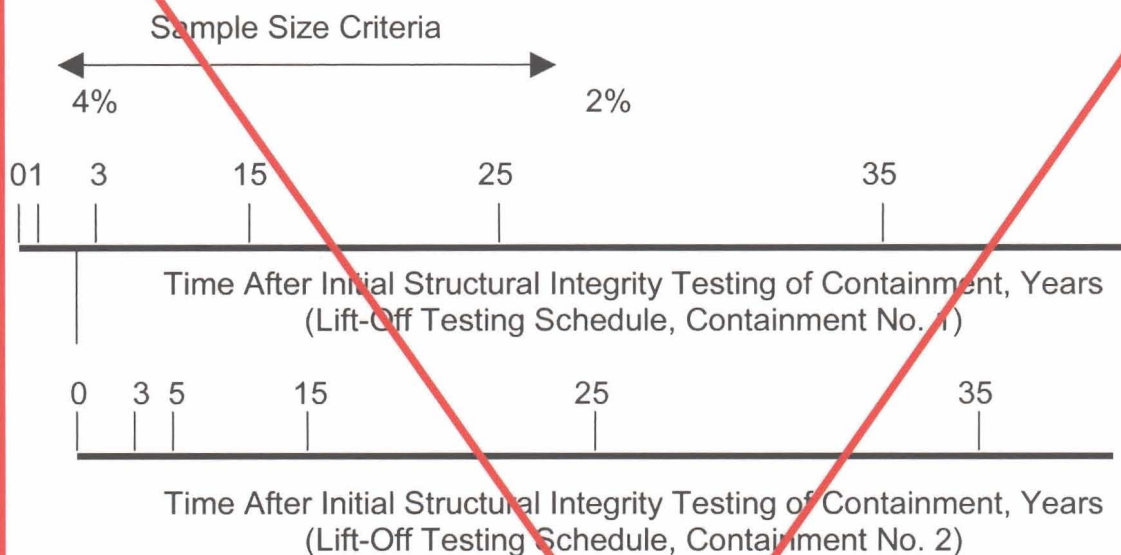
Section 9.2.3: The next Type A test, after the March 2002 test for Unit 1 and the March 1995 test for Unit 2, shall be performed within 15 years.

The peak calculated primary containment internal pressure for the design basis loss of coolant accident, P_a , is 37 psig.

The maximum allowable containment leakage rate, L_a , at P_a , is 0.2% of primary containment air weight per day.

(continued)

DELETE FIGURE 5.5.6-1



Schedule to be used provided:

- a. The containments are identical in all aspects such as size, tendon system, design materials of construction, and method of construction. The tendon system for Unit 2 does not provide for detensioning. Detensioning can be performed only on the Unit 1 tendon system.
- b. The 1-year inspection for Unit 2 will consist of a visual inspection only. No lift-off testing will be performed on Unit 2 until the 3-year inspection.
- c. There is no unique situation that may subject either containment to a different potential for structural or tendon deterioration.
- d. The Unit 1 and Unit 2 surveillances may be performed back-to-back to facilitate detensioning of Unit 1 tendons during the Unit 2 surveillance.

Figure 5.5.6-1 Schedule of Lift-Off Testing for Two Containments at a Site

5.6 Reporting Requirements

5.6.9 Tendon Surveillance Report

~~Any abnormal degradation of the containment structure detected during the tests required by the Prestressed Concrete Containment Tendon Surveillance Program shall be reported to the NRC within 30 days. The report shall include a description of the tendon condition, the condition of the concrete (especially at tendon anchorages), the inspection procedures, the tolerances on cracking, and the corrective action taken.~~

5.6.10 Steam Generator Tube Inspection Report

- a. Within 15 days following the completion of each inservice inspection of steam generator tubes, the number of tubes plugged in each steam generator shall be reported to the NRC.
 - b. The complete results of the steam generator tube inservice inspection shall be submitted to the NRC within 12 months following the completion of the inspection. This report shall include:
 1. Number and extent of tubes inspected,
 2. Location and percent of wall thickness penetration for each indication of an imperfection, and
 3. Identification of tubes plugged.
 - c. Results of steam generator tube inspections which fall into Category C-3 all be reported to the NRC within 30 days and prior to resumption of plant operation. This report shall provide a description of investigations conducted to determine the cause of the tube degradation and corrective measures taken to prevent recurrence.
-

BASES (continued)

ACTIONS

A.1

In the event containment is inoperable, containment must be restored to OPERABLE status within 1 hour. The 1 hour Completion Time provides a period of time to correct the problem commensurate with the importance of maintaining containment during MODES 1, 2, 3, and 4. This time period also ensures that the probability of an accident (requiring containment OPERABILITY) occurring during periods when containment is inoperable is minimal.

B.1 and B.2

If containment cannot be restored to OPERABLE status within the required Completion Time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE
REQUIREMENTS

SR 3.6.1.1

Maintaining the containment OPERABLE requires compliance with the visual examinations and leakage rate test requirements of the Containment Leakage Rate Testing Program. The containment concrete visual examinations may be performed during either power operation, e.g., performed concurrently with other containment inspection-related activities such as tendon testing, or during a maintenance/refueling outage. The visual examinations of the steel liner plate inside containment are performed during maintenance or refueling outages since this is the only time the liner plate is fully accessible.

Failure to meet air lock and purge valve with resilient seal leakage limits specified in LCO 3.6.2 and LCO 3.6.3 does not invalidate the acceptability of these overall leakage determinations unless their contribution to overall Type A, B, and C leakage causes that to exceed limits. Specific acceptance criteria for as-found and as-left leakage rates, as well as the methods of defining the leakage rates, are contained in the Containment Leakage Rate Testing Program. At all other times between required leakage rate tests, the acceptance criteria are based on an overall Type A leakage limit of

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.6.1.1 (continued)

$\leq 1.0L_a$. At $\leq 1.0L_a$ the offsite dose consequences are bounded by the assumptions of the safety analysis. SR Frequencies are as required by the Containment Leakage Rate Testing Program. These periodic testing requirements verify that the containment leakage rate does not exceed the leakage rate assumed in the safety analysis.

SR 3.6.1.2

For ungrouted, post-tensioned tendons, this SR ensures that the structural integrity of the containment will be maintained in accordance with the provisions of the Containment Tendon Surveillance Program. Testing and Frequency are in accordance with Section XI, Subsection IWL of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10 CFR 50.55a except where an exemption, relief, or alternative has been authorized by the NRC consistent with the recommendations of Regulatory Guide 1.35 (Ref. 4) and approved exceptions.

REFERENCES

1. 10 CFR 50, Appendix J, Option B.
 2. FSAR, Chapter 15.
 3. FSAR, Section 6.2.
 4. ~~Regulatory Guide 1.35, Revision 2.~~ Section XI, Subsection IWL of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10 CFR 50.55a.
 5. NEI 94-01, Revision 0, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J."
 6. ANSI/ANS-56.8-1994, "American National Standard for Containment System Leakage Testing Requirement."
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Enclosure 3

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5.5.6-1	Deleted.	

5.5 Programs and Manuals

5.5.6 Prestressed Concrete Containment Tendon Surveillance Program

This program provides controls for monitoring any tendon degradation in prestressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The program shall include baseline measurements prior to initial operations. The Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with ASME Boiler and Pressure Vessel Code Section XI, Subsection IWL and applicable addenda as required by 10 CFR 50.55a except where an exemption, relief, or alternative has been authorized by the NRC.

The provisions of SR 3.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.

5.5.7 Reactor Coolant Pump Flywheel Inspection Program

This program shall provide for the inspection of each reactor coolant pump flywheel at least once per 10 years by conducting either:

- a. An in-place ultrasonic examination over the volume from the inner bore of the flywheel to the circle of one-half the outer radius; or
- b. A surface examination (magnetic particle and/or liquid penetrant) of exposed surfaces of the disassembled flywheel.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Reactor Coolant Pump Flywheel Inspection Program.

(continued)

5.5 Programs and Manuals (continued)

5.5.17 Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Testing Program," dated September 1995, as modified by the following exceptions:

1. Leakage rate testing for containment purge valves with resilient seals is performed once per 18 months in accordance with LCO 3.6.3, SR 3.6.3.6 and SR 3.0.2.
2. Containment personnel air lock door seals will be tested prior to reestablishing containment integrity when the air lock has been used for containment entry. When containment integrity is required and the air lock has been used for containment entry, door seals will be tested at least once per 30 days during the period that containment entry(ies) is (are) being made.
3. The visual examination of containment concrete surfaces intended to fulfill the requirements of 10 CFR 50, Appendix J, Option B testing, will be performed in accordance with the requirements of and frequency specified by ASME Section XI Code, Subsection IWL, except where relief or alternative has been authorized by the NRC. At the discretion of the licensee, the containment concrete visual examinations may be performed during either power operation, e.g., performed concurrently with other containment inspection-related activities such as tendon testing, or during a maintenance/refueling outage.
4. A one time exception to NEI 94-01, Rev. 0, "Industry Guidelines for Implementing Performance-Based Option of 10 CFR 50, Appendix J":

Section 9.2.3: The next Type A test, after the March 2002 test for Unit 1 and the March 1995 test for Unit 2, shall be performed within 15 years.

The peak calculated primary containment internal pressure for the design basis loss of coolant accident, P_a , is 37 psig.

The maximum allowable containment leakage rate, L_a , at P_a , is 0.2% of primary containment air weight per day.

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5.6 Reporting Requirements

5.6.9 Deleted.

5.6.10 Steam Generator Tube Inspection Report

- a. Within 15 days following the completion of each inservice inspection of steam generator tubes, the number of tubes plugged in each steam generator shall be reported to the NRC.
 - b. The complete results of the steam generator tube inservice inspection shall be submitted to the NRC within 12 months following the completion of the inspection. This report shall include:
 - 1. Number and extent of tubes inspected,
 - 2. Location and percent of wall thickness penetration for each indication of an imperfection, and
 - 3. Identification of tubes plugged.
 - c. Results of steam generator tube inspections which fall into Category C-3 all be reported to the NRC within 30 days and prior to resumption of plant operation. This report shall provide a description of investigations conducted to determine the cause of the tube degradation and corrective measures taken to prevent recurrence.
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BASES (continued)

ACTIONS

A.1

In the event containment is inoperable, containment must be restored to OPERABLE status within 1 hour. The 1 hour Completion Time provides a period of time to correct the problem commensurate with the importance of maintaining containment during MODES 1, 2, 3, and 4. This time period also ensures that the probability of an accident (requiring containment OPERABILITY) occurring during periods when containment is inoperable is minimal.

B.1 and B.2

If containment cannot be restored to OPERABLE status within the required Completion Time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE
REQUIREMENTS

SR 3.6.1.1

Maintaining the containment OPERABLE requires compliance with the visual examinations and leakage rate test requirements of the Containment Leakage Rate Testing Program. The containment concrete visual examinations may be performed during either power operation, e.g., performed concurrently with other containment inspection-related activities such as tendon testing, or during a maintenance/refueling outage. The visual examinations of the steel liner plate inside containment are performed during maintenance or refueling outages since this is the only time the liner plate is fully accessible.

Failure to meet air lock and purge valve with resilient seal leakage limits specified in LCO 3.6.2 and LCO 3.6.3 does not invalidate the acceptability of these overall leakage determinations unless their contribution to overall Type A, B, and C leakage causes that to exceed limits. Specific acceptance criteria for as-found and as-left leakage rates, as well as the methods of defining the leakage rates, are contained in the Containment Leakage Rate Testing Program. At all other times between required leakage rate tests, the acceptance criteria are based on an overall Type A leakage limit of

(continued)

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.6.1.1 (continued)

$\leq 1.0L_a$. At $\leq 1.0L_a$ the offsite dose consequences are bounded by the assumptions of the safety analysis. SR Frequencies are as required by the Containment Leakage Rate Testing Program. These periodic testing requirements verify that the containment leakage rate does not exceed the leakage rate assumed in the safety analysis.

SR 3.6.1.2

For ungrouted, post-tensioned tendons, this SR ensures that the structural integrity of the containment will be maintained in accordance with the provisions of the Containment Tendon Surveillance Program. Testing and Frequency are in accordance with ASME Boiler and Pressure Vessel Code Section XI, Subsection IWL and applicable addenda as required by 10 CFR 50.55a except where an exemption, relief, or alternative has been authorized by the NRC (Ref. 4).

REFERENCES

1. 10 CFR 50, Appendix J, Option B.
 2. FSAR, Chapter 15.
 3. FSAR, Section 6.2.
 4. ASME Boiler and Pressure Vessel Code Section XI, Subsection IWL and applicable addenda as required by 10 CFR 50.55a.
 5. NEI 94-01, Revision 0, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J."
 6. ANSI/ANS-56.8-1994, "American National Standard for Containment System Leakage Testing Requirement."
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