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June 9, 2006

Docket Nos.: 50-424
50-425

NL-06-1224

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

Vogtle Electric Generating Plant
Response to Request for Additional Information
Regarding Request to Revise Technical Specifications
Reactor Trip System Instrumentation

Ladies and Gentlemen:

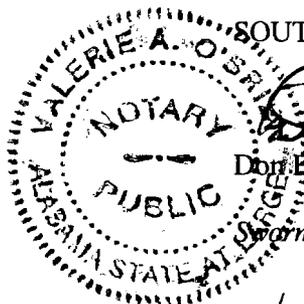
On May 24, 2006, Southern Nuclear Operating Company (SNC) received two questions by facsimile from the NRC staff concerning the September 19, 2005, Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 application for Technical Specification (TS) revision regarding reactor trip system instrumentation. The SNC response to these questions is enclosed.

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
Don E. Grissette

Sworn to and subscribed before me this 9 day of June, 2006.

Valerie A. Oberlin
Notary Public

My commission expires: 4-28-07

DEG/TDH/daj

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Enclosure: Response to Request for Additional Information

cc: Southern Nuclear Operating Company
Mr. J. T. Gasser, Executive Vice President
Mr. T. E. Tynan, 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

State of Georgia
Mr. L. C. Barrett, Commissioner – Department of Natural Resources

Enclosure

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Enclosure

Vogtle Electric Generating Plant Response to Request for Additional Information Regarding Request to Revise Technical Specifications Reactor Trip System Instrumentation

1. NRC Question

The Nuclear Regulatory Commission staff has found that the license amendment application does not provide a safety analysis of all proposed Vogtle Units 1 and 2 TS changes. Upon discovery of an inoperable Power Range Neutron Flux-High Function channel, Vogtle Units 1 and 2 TS Condition D requires one of three actions to be met:

- (1) place the inoperable channel in the tripped condition (D.1.1) and reduce THERMAL POWER to ≤ 75 percent (%) RTP (D.1.2), or
- (2) place the inoperable channel in the tripped condition (D.2.1), and Perform SR 3.2.4.2 (only required to be performed when the power range neutron (PRN) flux channel input to QPTR is inoperable and THERMAL POWER is ≥ 75 % RTP (D.2.2)), or
- (3) place the reactor in Mode 3 (D.3).

Requirement D.3 is retained. However, SNC does not provide a technical justification for deleting TS required action D.1.2 (reduce THERMAL POWER to ≤ 75 % RTP within 78 hours), which is the subsequent required action after meeting D.1.1. Rather, the discussion states that "An alternate to D.1.1 and D.1.2 is to place the inoperable channel in the tripped condition and perform SR 3.2.4.2 once every 12 hours." This explanation does not address the proposed change to the Vogtle licensing basis. Please provide a technical justification for deleting TS required action D.1.2.

SNC Response

Proposed Note 2 of LCO 3.3.1, Condition D, refers to LCO 3.2.4 for an inoperable power range channel. Required Action D.1.2 requires THERMAL POWER to be reduced to ≤ 75 % RTP within 78 hours. SR 3.2.4.2 is only applicable when thermal power is ≥ 75 % RTP. Therefore, the action to reduce thermal power to ≤ 75 % RTP is still an option in LCO 3.2.4. Therefore, required action D.1.2 can be deleted from LCO 3.3.1, Condition D because this option is still available in LCO 3.2.4.

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2. **NRC Question**

Additionally, Required Actions D.2.1 and D.2.2 specify actions that must be met if the input to the QPTR is inoperable as a result of the inoperable PRN flux channel. The current TS requirements states, SR 3.2.4.2 is only applicable above 75% RTP. The proposed TS changes would require the periodic testing in SR 3.2.4.2 when thermal power is above 75 % RTP and below 75 % RTP. Provide a justification for the change to Vogtle TS that addresses plant operation with an inoperable PRN Flux channel for the case of the QPTR input inoperable below 75 % RTP and for the case of the QPTR input operable below 75 % RTP.

SNC Response

The response to this question is addressed in the response to Question 1.