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July 6, 2006

Docket Nos.: 50-424
50-425

NL-06-1458

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
Technical Specification Revision Request
Containment Tendon Surveillance Program

Ladies and Gentlemen:

On March 29, 2006, Southern Nuclear Operating Company (SNC) submitted a proposed change to the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications (TS). 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.

On June 6, 2006, SNC received a Request for Additional Information (RAI) containing 2 questions from the staff concerning the VEGP Containment Tendon Surveillance Program Submittal. SNC responses to these questions are enclosed.


(Signature and affirmation are on the following page.)

Mr. H. L. Sumner, Jr. 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.

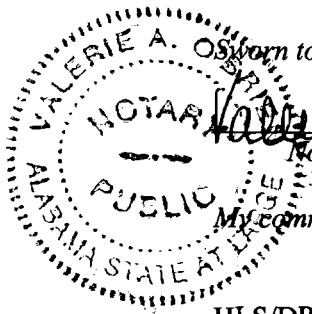
This letter contains no NRC commitments. If you have any questions, please advise.

Respectfully submitted,

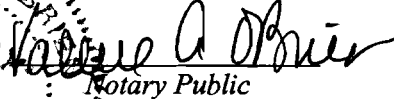
SOUTHERN NUCLEAR OPERATING COMPANY



H. L. Sumner, Jr.



Sworn to and subscribed before me this 6th day of July, 2006.


Notary Public

My commission expires: 4-28-07

HLS/DRG/daj

Enclosure: Vogtle Electric Generating Plant Response to Request for Additional Information Regarding the Containment Tendon Surveillance Program

cc: Southern Nuclear Operating Company
Mr. J. T. Gasser, Executive Vice President
Mr. D. E. Grissette, Vice-President – Plant Vogtle
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

Vogtle Electric Generating Plant
Response to Request for Additional Information Regarding the
Containment Tendon Surveillance Program

Vogtle Electric Generating Plant
Response to Request for Additional Information Regarding the
Containment Tendon Surveillance Program

NRC Question 1

In the first page of the enclosure to SNC's letter, SNC stated that "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 [Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Section 50.55a(b)(2)(viii)] 10 CFR 50.55a(b)(2)(viii)." Please clarify how the requirements of 10 CFR 50.55a(b)(2)(viii)(A-E) are addressed in SNC's inspection program.

SNC Response to NRC Question 1

Southern Nuclear Operating Company's (SNC) Vogtle Electric Generating Plant (VEGP) utilizes the equivalent requirements of the 1997 10 CFR 50.55a(b)(2)(ix), which are required to be met per the VEGP Containment Inspection Program Plan.

In accordance with the VEGP Containment Inspection Program Plan, VEGP addresses the 10 CFR 50.55a(b)(2)(ix)(A) examination requirement by performing grease cap inspections at the same frequency as the VT-3C required by IWL Item L1.11.

The VEGP Containment Inspection Program Plan captures the reporting requirements of IWA-6000 as supplemented by 10 CFR 50.55a(b)(2)(ix)(B-E). In addition, the non-reporting requirements of 10 CFR 50.55a(b)(2)(ix)(B-C) are listed in VEGP procedure "Containment Tendon Surveillance Requirements" as acceptance criteria. As noted in the VEGP Containment Inspection Program Plan, Request for Engineering Reviews are used to evaluate potential degradation in inaccessible areas as described in requirement 10 CFR 50.55a(b)(2)(ix)(E).

NRC Question 2

In the second page of the enclosure to SNC's letter under TS Section 5.5.17 "Containment Leakage Rate Testing Program," SNC stated that "The visual examination of containment concrete surfaces intended to fulfill the requirements of 10 CFR [Part] 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." Please clarify how SNC's inspection program meets these requirements.

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SNC Response to NRC Question 2

10 CFR 50 Appendix J, Option B requires that:

"A general visual inspection of the accessible interior and exterior surfaces of the containment system for structural deterioration which may affect the containment leak-tight integrity must be conducted prior to each test, and at a periodic interval between tests based on the performance of the containment system."

The IWE general visual exam (IWE-3510.1) in conjunction with the IWL Concrete surface VT-3C exams (IWL-2510) of the interior surfaces and exterior surfaces of the containment at an interval described in Section XI meets the intent of 10 CFR Appendix J, Option B for VEGP. In addition, both the IWE and IWL containment surface visual exams are performed when performing a Type A test in accordance with 10 CFR 50 Appendix J, Option B.