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January 30, 2007

Docket Nos.: 50-348 50-424
50-364 50-425

NL-07-0121

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

Joseph M. Farley Nuclear Plant
Vogtle Electric Generating Plant
Examination and Mitigation of Alloy 82/182 Pressurizer Butt Welds

Ladies and Gentlemen:

In October 2006, while performing examinations of its pressurizer Alloy 82/182 butt welds in accordance with MRP-139, a PWR licensee discovered several circumferential indications in its pressurizer surge, safety, and relief nozzles. Because of the potential importance of this issue, Southern Nuclear Operating Company (SNC) hereby notifies the NRC of Joseph M. Farley Nuclear Plant's (FNP) and Vogtle Electric Generating Plant's (VEGP) actions taken or committing to for examination and mitigating activities for Alloy 82/182 butt welds on pressurizer spray, surge, safety, and relief nozzles.

Mitigation activities and post-mitigation examinations at FNP-1 and VEGP-2 will be completed prior to December 31, 2007. Examination activities at FNP-2 will be completed prior to December 31, 2007. Mitigation activities and post-mitigation examinations at VEGP-1 will be completed after December 31, 2007. Please refer to the enclosures for details on the actions planned or taken for each plant.

SNC will stay apprised of industry actions and recommendations provided in NEI letter, dated January 26, 2007, from Marvin S. Fertel to Luis A. Reyes, "Industry Actions Associated with Potential Generic Implications of Wolf Creek Inspection Findings." For VEGP-1, SNC will accelerate the planned mitigation outage, currently scheduled for 2008, if analytical results do not demonstrate that current schedules are adequate.

This letter contains NRC commitments. The NRC will be informed if FNP or VEGP deviates from any of the commitments described in this letter.

Our staff is available to meet with the NRC to discuss the information in this letter.

If you have any questions, please advise.

Sincerely,



Jeffrey T. Gasser

JTG/LPH/daj

- Enclosures:
1. Examination and Mitigation Information for FNP-1 & FNP-2
 2. Examination and Mitigation Information for VEGP-1 & VEGP-2
 3. List of Regulatory Commitments

cc: Southern Nuclear Operating Company
Mr. J. R. Johnson, Vice President – Farley
Mr. T. E. Tynan, Vice President – Vogtle
RType: CFA04.054; CVC7000; LC# 14531

U. S. Nuclear Regulatory Commission
Dr. W. D. Travers, Regional Administrator
Ms. K. R. Cotton, NRR Project Manager – Farley
Mr. B. K. Singal, NRR Project Manager – Vogtle
Mr. C. A. Patterson, Senior Resident Inspector – Farley
Mr. G. J. McCoy, Senior Resident Inspector – Vogtle

Nuclear Energy Institute
Mr. M. S. Fertel
Mr. J. H. Riley

Enclosure 1

**Joseph M. Farley Nuclear Plant
Examination and Mitigation Information for FNP-1 & FNP-2**

Enclosure 1

Joseph M. Farley Nuclear Plant Examination and Mitigation Information for FNP-1 & FNP-2

FNP-1

Examination and mitigation of pressurizer Alloy 82/182 butt welds at Farley Unit 1 have not been completed, but SNC will complete all MRP-139 examination and mitigation activities on these locations during the 1R21 outage which starts in September 2007. Details concerning Farley Unit 1 examination and mitigation activities are provided in the enclosed table. Additional details can be found in proposed alternative ISI-GEN-ALT-06-03, which was submitted to the NRC by SNC letter NL-06-2768, dated January 3, 2007. Future examinations of pressurizer weld overlays at Farley Unit 1 will be performed in accordance with industry guidance (MRP-139) and NL-06-2768. The results of future inspections or mitigations of pressurizer Alloy 82/182 butt weld locations will be reported to the NRC within 60 days of startup from the outage during which they were performed.

In addition to the examination and mitigation actions described above, the process below for monitoring primary system leakage will be used at FNP-1 until all Alloy 82/182 butt weld locations on the pressurizer have been mitigated.

1. Monitoring Capabilities and Methods
 - a. Reactor Coolant System (RCS) Leak Rate Surveillance
 - i. Procedure FNP-1-STP-9.0 performed every 48 hours
 - ii. Leak measurement is normally performed over 2 hour period.
 - iii. Not required to be performed until 12 hours after establishment of steady state operation.
 - b. Online RCS Leak Rate Computer Point
 - i. Provides online trending ability
 - ii. Trend is viewed during performance of FNP-1-STP-9.0.
 - c. Containment Radiation Monitors
 - i. R-11 & R-12 containment radiation monitors provide alarm function.
 - ii. Trending is available on plant computer.
 - iii. Recorded on FNP-1-STP-9.0 for trending.
 - d. Containment Cooler Condensate Pot Level Indication and Alarms
 - i. Indication and alarm function for moisture in containment.
 - e. Containment Sump Level Indication and Alarms
 - i. Indication of unexpected leakage in containment.
 - ii. Recorded on FNP-1-STP-9.0 for trending.

Enclosure 1

Joseph M. Farley Nuclear Plant
Examination and Mitigation Information for FNP-1 & FNP-2

2. Action Levels and Responses

- a. If any abnormal leakage is detected, then perform an inspection and evaluation to identify and document the leakage path(s), any corrective actions, and the affects of the leakage (Procedure FNP-1-AOP-1.0, attachments 2 through 5). Generally, ≥ 0.15 gpm would be considered abnormal.
- b. If unidentified leakage is determined to be > 0.25 gpm, then perform an additional FNP- 1-STP-9.0 to confirm the result. If the result is confirmed to be > 0.25 gpm, then request chemistry to collect a manual sample for Iron analysis.

FNP is evaluating the Pressurized Water Reactors Owner Group (PWROG) program (WCAP-16465 & WCAP-16423) regarding standardized RCS leakage monitoring, and anticipates implementation during 2007.

SNC will provide updates to the NRC as necessary regarding any changes to the FNP leakage monitoring program by March 31, 2007.

FNP-1
Examination and Mitigation Information Table
Examination and Mitigation Summary for Alloy 82/182 Pressurizer Butt Welds

Nozzle		MRP-139 Volumetric Examination Requirement Met or to be Met		Mitigation Completed or to be Completed	Comments
Function / Designation	Susceptible Material Description	Outage Designation	Start Date (MM/YYYY)	Outage Designation	
Spray ALA 1-4205-35DM	(1) (2) (3) & (4) Alloy 82 / 182	1R21	09/2007	1R21	Mitigate by weld overlay
Surge ALA 1-4500-6DM	(1) (2) & (3) Alloy 82 / 182	1R21	09/2007	1R21	Mitigate by weld overlay
Safety 1 ALA 1-4501-1DM	(1) (2) & (4) Alloy 82 / 182	1R21	09/2007	1R21	Mitigate by weld overlay
Safety 2 ALA 1-4502-1DM	(1) (2) & (4) Alloy 82 / 182	1R21	09/2007	1R21	Mitigate by weld overlay
Safety 3 ALA 1-4503-1DM	(1) (2) & (4) Alloy 82 / 182	1R21	09/2007	1R21	Mitigate by weld overlay
Relief ALA 1-4504-1DM	(1) (2) & (4) Alloy 82 / 182	1R21	09/2007	1R21	Mitigate by weld overlay

- (1) Nozzle-to-safe end butter
- (2) Nozzle-to-safe end weld
- (3) Thermal sleeve-to-safe end weld
- (4) Liner weld-to-safe end butter

Enclosure 1

Joseph M. Farley Nuclear Plant Examination and Mitigation Information for FNP-1 & FNP-2

FNP-2

Two pressurizer Alloy 82/182 butt welds at FNP-2 have been examined per a Performance Demonstration Initiative (PDI) qualified ultrasonic testing (UT) method in accordance with MRP-139. Details concerning the locations examined and the results of completed examinations are provided in the enclosed tables. Future examinations of pressurizer butt welds at FNP-2 will be performed in accordance with industry guidance (MRP-139).

Examination of the four remaining pressurizer Alloy 82/182 butt welds at FNP-2 has not been completed, but SNC will complete all MRP-139 required examinations on these locations during the 2R18 outage in April 2007. Mitigation by weld overlay of all six FNP-2 pressurizer nozzles is planned for the 2R20 outage in spring 2010. Details concerning FNP-2 examination and mitigation activities are provided in the enclosed table.

In addition to the examination and mitigation actions described above, the process below for monitoring primary system leakage will be used at FNP-2 until all Alloy 82/182 butt weld locations on the pressurizer have been examined per a PDI qualified UT method.

1. Monitoring Capabilities and Methods
 - a. RCS Leak Rate Surveillance
 - i. Procedure FNP-2-STP-9.0 performed every 48 hours
 - ii. Leak measurement is normally performed over 2 hour period.
 - iii. Not required to be performed until 12 hours after establishment of steady state operation.
 - b. Online RCS Leak Rate Computer Point
 - i. Provides online trending ability
 - ii. Trend is viewed during performance of FNP-2-STP-9.0.
 - c. Containment Radiation Monitors
 - i. R-11 & R-12 containment radiation monitors provide alarm function.
 - ii. Trending is available on plant computer.
 - iii. Recorded on FNP-2-STP-9.0 for trending.
 - d. Containment Cooler Condensate Pot Level Indication and Alarms
 - i. Indication and alarm function for moisture in containment.
 - e. Containment Sump Level Indication and Alarms
 - i. Indication of unexpected leakage in containment.
 - ii. Recorded on FNP-2-STP-9.0 for trending.

Enclosure 1

Joseph M. Farley Nuclear Plant Examination and Mitigation Information for FNP-1 & FNP-2

2. Action Levels and Responses
 - a. If any abnormal leakage is detected, then perform an inspection and evaluation to identify and document the leakage path(s), any corrective actions, and the affects of the leakage (Procedure FNP-2-AOP-1.0, attachments 2 through 5). Generally, ≥ 0.15 gpm would be considered abnormal.
 - a. If unidentified leakage is determined to be > 0.25 gpm, then perform an additional FNP- 2-STP-9.0 to confirm the result. If the result is confirmed to be > 0.25 gpm, then request chemistry to collect a manual sample for Iron analysis.

FNP is evaluating the PWROG program (WCAP-16465 & WCAP-16423) regarding standardized RCS leakage monitoring, and anticipates implementation during 2007.

SNC will provide updates to the NRC as necessary regarding any changes to the FNP leakage monitoring program by March 31, 2007.

FNP-2
Inspection and Mitigation Information Table
Examination and Mitigation Summary for Alloy 82/182 Pressurizer Butt Welds

Nozzle		MRP-139 Volumetric Examination Requirement Met or to be Met		Mitigation Completed or to be Completed	Comments
Function / Designation	Susceptible Material Description	Outage Designation	Start Date (MM/YYYY)	Outage Designation	
Spray APR 1-4205-49DM	(1) (2) (3) & (4) Alloy 82 / 182	2R17	10/2005	2R20 (Spring 2010)	PDI examination acceptable. Mitigate by weld overlay.
Surge APR 1-4500-7DM	(1) (2) & (3) Alloy 82 / 182	2R18	04/2007	2R20 (Spring 2010)	Mitigate by weld overlay
Safety 1 APR 1-4501-1DM	(1) (2) & (4) Alloy 82 / 182	2R18	04/2007	2R20 (Spring 2010)	Mitigate by weld overlay
Safety 2 APR 1-4502-1DM	(1) (2) & (4) Alloy 82 / 182	2R18	04/2007	2R20 (Spring 2010)	Mitigate by weld overlay
Safety 3 APR 1-4503-1DM	(1) (2) & (4) Alloy 82 / 182	2R17	10/2005	2R20 (Spring 2010)	PDI examination acceptable. Mitigate by weld overlay.
Relief APR 1-4504-1DM	(1) (2) & (4) Alloy 82 / 182	2R18	04/2007	2R20 (Spring 2010)	Mitigate by weld overlay

- (1) Nozzle-to-safe end butter
- (2) Nozzle-to-safe end weld
- (3) Thermal sleeve-to-safe end weld
- (4) Liner weld-to-safe end butter

Enclosure 2

**Vogtle Electric Generating Plant
Examination and Mitigation Information for VEGP-1 & VEGP-2**

Enclosure 2

Vogtle Electric Generating Plant Examination and Mitigation Information for VEGP-1 & VEGP-2

VEGP-1

The pressurizer spray nozzle Alloy 82 butt weld at VEGP-1 has been examined per a PDI qualified UT method in accordance with MRP-139. Details concerning the examination are provided in the enclosed table.

Examination of the five remaining pressurizer Alloy 82 butt welds and mitigation activities at VEGP-1 will be completed after December 31, 2007. Details concerning VEGP-1 examination and mitigation activities are provided in the enclosed table. Future examinations of pressurizer weld overlays at VEGP-1 will be performed in accordance with industry guidance (MRP-139) and an approved NRC alternative. The results of future inspections or mitigations of pressurizer Alloy 82 butt weld locations will be reported to the NRC within 60 days of startup from the outage during which they were performed.

Mitigation by weld overlay of all six VEGP-1 pressurizer nozzles is planned for the 1R14 outage in March 2008. The primary reason that VEGP-1 is not being completed before December 31, 2007 is because the outage cycle for this unit had only one planned outage between the issuance of MRP-139 in July 2005 and the December 31, 2007 implementation schedule for pressurizer butt welds. SNC considered it essential to perform a walkdown of the pressurizer cubicle to plan the weld overlay activity, since the design of the top of the Vogtle pressurizer has several significant interferences that must be removed to provide access for the weld overlay tooling and then replaced. The walkdown information permits better planning, a more accurate design package, reduced implementation risk, and lower radiation exposure than performing this activity without the benefit of the walkdown.

The industry examination and evaluation guideline MRP-139, paragraph 6.8.2 states, "Owners who know that their welds cannot be volumetrically examined are not required to perform a best-effort NDE; however, by the time the examination is due, they are required to have a plan to address either the susceptibility of the weld or the inspectability of the weld." Vogtle performed physical profiling of the six pressurizer Alloy 82 butt welds during the 1R12 outage in spring 2005 and determined the three safety nozzles and the relief nozzle cannot be examined in accordance with PDI requirements due to unfavorable geometries that limit examination volume coverage to between 27% and 60%. Vogtle has a plan in place and a vendor contract awarded to make the welds examinable by applying weld overlays during the 1R14 outage in March 2008, which is approximately 10 weeks after the MRP-139 implementation schedule.

Enclosure 2

Vogtle Electric Generating Plant Examination and Mitigation Information for VEGP-1 & VEGP-2

SNC considers the scheduled March 2008 mitigation date acceptable based on the following:

- Previous examination results
Bare metal visual (BMV) examinations were performed of all six pressurizer Alloy 82 butt welds during the 1R12 and 1R13 outages in 2005 and 2006 with no evidence of leakage. The spray nozzle was examined in accordance with PDI in the 1R12 outage in 2005 and found acceptable. The remaining five Alloy 82 butt weld examinations have been performed under the ISI Program in accordance with ASME Section XI. Details of the safety nozzles and relief nozzle exams were reported in SNC response to Bulletin 2004-01 by letter NL-04-1150, dated July 26, 2004. The most recent ISI examinations were in the 1R9 outage (2000) for the safety nozzles and relief nozzle, and in the 1R5 (1995) for the surge nozzle. These were not PDI exams; however, based on physical profile data the anticipated PDI exam coverage for the surge nozzle is near 100%. Therefore, the past ISI exam on the surge nozzle achieved good examination coverage.
- Assessment of original fabrication welds documentation to identify welds that had been reworked
SNC participated in a PWR Owners Group Materials Subcommittee project (PWROG PA-MS-0233) to review fabrication details of dissimilar metal welds. For Vogtle Unit 1, Alloy 82 weld repairs were only identified on the inside diameter of the spray nozzle and the safety #1 nozzle. The spray nozzle was examined in accordance with PDI in 2005, and there were no recordable indications. The safety #1 nozzle had a number of ground outs on the inner diameter which were repaired using Alloy 82 weld filler metal. A postweld heat treatment was performed after the safety #1 nozzle repairs. It is possible that not all in-process weld repairs were documented.
- Water chemistry, e.g., zinc addition
VEGP-1 follows current industry guidelines for primary water chemistry. Strong evidence exists that zinc addition to the primary coolant inhibits the initiation of PWSCC and may also slow the propagation of existing cracks. The VEGP-1 pressurizer surge line has been exposed to approximately 50 ppb-months of zinc chemistry. Zinc was initially added during Cycle 12 (August 2004); however, it was discontinued in October 2005 because of considerations for nuclear fuel. There are plans to resume zinc addition approximately midway through the current operating cycle at VEGP-1.
- Plant age
The susceptibility to PWSCC of Alloy 82/182 is largely a function of time at temperature when all other variables are constant. Since pressurizers in a PWR operate at saturated conditions, all PWRs that operate at a nominal 2250 psi have a pressurizer operating temperature within a few degrees of 653° F, and can be

Enclosure 2

Vogtle Electric Generating Plant Examination and Mitigation Information for VEGP-1 & VEGP-2

compared directly based on operating time. Based on industry data (MRP-48) in response to NRC Bulletin 2001-01, the EPFY for VEGP-1 ranked in the lower third of U.S. PWR operating plants and has less operating time than the plant that observed circumferential flaws in the pressurizer dissimilar metal welds.

- Industry safety assessment

As a result of the circumferential indications found in October 2006 the industry, through EPRI MRP, reviewed the Alloy 82/182 Pipe Butt Weld Safety Assessment (MRP-113) and the Primary System Piping Butt Weld Inspection and Evaluation Guideline (MRP-139). This review was transmitted from EPRI to the NRC by letter MRP 2007-03 dated January 22, 2007. The review is contained in the report, entitled "Implications of Wolf Creek Pressurizer Butt Weld Indications Relative to Safety Assessment and Inspection Requirements," attached to the letter. The conclusions from the industry review included:

- MRP-113 and MRP-139 remain valid.
- Critical flaw sizes are several times larger than the indications observed in October 2006.
- Bare metal visual examinations during that last refueling outage, and improved leak monitoring, ensure a low risk of leaks and an extremely low risk of rupture through the spring 2008.

Details concerning Vogtle Unit 1 examination and mitigation activities are provided in the enclosed table. Future examinations of pressurizer butt welds at Vogtle Unit 1 will be performed in accordance with industry guidance (MRP-139) and proposed alternative ISI-GEN-ALT-06-03, which was submitted to the NRC by SNC letter NL-06-2768, dated January 3, 2007.

The process below for monitoring primary system leakage will be used at VEGP-1 until all Alloy 82 butt weld locations on the pressurizer have been mitigated.

1. Monitoring Capabilities and Methods

- a. Reactor Coolant System (RCS) Leak Rate Surveillance
 - i. VEGP procedure 14905-1 performed every 48 hours.
 - ii. Leak measurement is normally performed over 2 hour period.
 - iii. Not required to be performed until 12 hours after establishment of steady state operation.
- b. 1-RE-2562A and 1-RE-2562C containment radiation monitors provide alarm function. The alarm setpoint for both monitors is 2 times background level which provides for sensitive indication of RCS leakage. Operational experience has demonstrated that these alarms will provide indication of RCS leakage before it can be detected via the leak rate surveillance.
- c. Containment air cooler condenser flow monitoring system provides indication and alarm function for moisture in containment.
- d. Containment sump level indication and alarms provide indication of unexpected leakage in containment.

Enclosure 2

Vogtle Electric Generating Plant Examination and Mitigation Information for VEGP-1 & VEGP-2

2. Action Levels and Responses

- a. If RCS unidentified leakage increases to greater than 0.2 gpm, direct chemistry to analyze 1-RE-2562A filter for iron content.
- b. If RCS leakage increases by 0.05 gpm over the 30 day trend, use procedure 14905-1 Attachment 1 to determine the source of the leakage.
- c. If the containment air cooler condensate flow rate high condensate flow alarm actuates and a RCS leak is suspected, a RCS leakage calculation is performed.
- d. If containment radiation monitors alarm, the RCS leakage procedure 18004-C is performed.
- e. If containment sump level alarms and the leakage source is unknown, a RCS leakage calculation is performed.

VEGP is evaluating the Pressurized Water Reactors Owner Group (PWROG) program (WCAP-16465 & WCAP-16423) regarding standardized RCS leakage monitoring, and anticipates implementation during 2007.

In addition, for VEGP-1, SNC will stay apprised of industry actions and recommendations provided in NEI letter, dated January 26, 2007, from Marvin S. Fertel to Luis A. Reyes, "Industry Actions Associated with Potential Generic Implications of Wolf Creek Inspection Findings."

SNC will provide updates to the NRC as necessary regarding any changes to the VEGP leakage monitoring program by March 31, 2007.

Plans for any additional capability which reliably and meaningfully adds to the ability to diagnose primary system leakage, as well as installation schedules as appropriate, will be submitted to the NRC by May 31, 2007.

VEGP-1
Examination and Mitigation Information Table
Examination and Mitigation Summary for Alloy 82 Pressurizer Butt Welds

Nozzle		MRP-139 Volumetric Examination Requirement Met or to be Met		Mitigation Completed or to be Completed	Comments
Function / Designation	Susceptible Material Description	Outage Designation	Start Date (MM/YYYY)	Outage Designation	
Spray 11201-V6-002-W21	(1) (2) (3) & (4) Alloy 82	1R12	03/2005	1R14 (Spring 2008)	PDI examination acceptable. Mitigate by weld overlay.
Surge 11201-V6-002-W22	(1) (2) & (3) Alloy 82	1R14	03/2008	1R14 (Spring 2008)	Mitigate by weld overlay.
Safety 1 11201-V6-002-W17	(1) & (2) Alloy 82	1R14	03/2008	1R14 (Spring 2008)	Mitigate by weld overlay.
Safety 2 11201-V6-002-W18	(1) & (2) Alloy 82	1R14	03/2008	1R14 (Spring 2008)	Mitigate by weld overlay.
Safety 3 11201-V6-002-W19	(1) & (2) Alloy 82	1R14	03/2008	1R14 (Spring 2008)	Mitigate by weld overlay.
Relief 11201-V6-002-W20	(1) & (2) Alloy 82	1R14	03/2008	1R14 (Spring 2008)	Mitigate by weld overlay.

- (1) Nozzle-to-safe end butter
- (2) Nozzle-to-safe end weld
- (3) Thermal sleeve-to-safe end weld
- (4) Liner weld-to-safe end butter

Enclosure 2

Vogtle Electric Generating Plant Examination and Mitigation Information for VEGP-1 & VEGP-2

VEGP 2

Examination and mitigation of pressurizer Alloy 82 butt welds at Vogtle Unit 2 have not been completed, but SNC will complete all MRP-139 examination and mitigation activities on these locations during the 2R12 outage which starts in March 2007. Details concerning Vogtle Unit 2 examination and mitigation activities are provided in the enclosed table. Additional details can be found in proposed alternative ISI-GEN-ALT-06-03, which was submitted to the NRC by SNC letter NL-06-2768, dated January 3, 2007. Future examinations of pressurizer weld overlays at Vogtle Unit 2 will be performed in accordance with industry guidance (MRP-139) and NL-06-2768. The results of future inspections or mitigations of pressurizer Alloy 82 butt weld locations will be reported to the NRC within 60 days of startup from the outage during which they were performed.

In addition to the examination and mitigation actions described above, the process below for monitoring primary system leakage will be used at VEGP-2 until all Alloy 82 butt weld locations on the pressurizer have been mitigated.

1. Monitoring Capabilities and Methods
 - a. RCS Leak Rate Surveillance
 - i. VEGP procedure 14905-2 performed every 48 hours.
 - ii. Leak measurement is normally performed over 2 hour period.
 - iii. Not required to be performed until 12 hours after establishment of steady state operation.
 - b. 2-RE-2562A and 2-RE-2562C containment radiation monitors provide alarm function. The alarm setpoint for both monitors is 2 times background level which provides for sensitive indication of RCS leakage. Operational experience has demonstrated that these alarms will provide indication of RCS leakage before it can be detected via the leak rate surveillance.
 - c. Containment cooler condenser leak alarms provide indication and alarm function for moisture in containment.
 - d. Containment sump level indication and alarms provide indication of unexpected leakage in containment.
2. Action Levels and Responses
 - a. If RCS unidentified leakage increases to greater than 0.2 gpm, direct chemistry to analyze 2-RE-2562A filter for iron content.
 - b. If RCS leakage increases by 0.05 gpm over the 30 day trend, use procedure 14905-2 Attachment 1 to determine the source of the leakage.
 - c. If containment cooler condenser leak alarms and a RCS leak is suspected, a RCS leakage calculation is performed.
 - d. If containment radiation monitors alarm, the RCS leakage procedure 18004-C is performed.
 - e. If containment Sump level alarms and leakage source is unknown, a RCS leakage calculation is performed.

Enclosure 2

Vogtle Electric Generating Plant
Examination and Mitigation Information for VEGP-1 & VEGP-2

VEGP is evaluating the PWROG program (WCAP-16465 & WCAP-16423) regarding standardized RCS leakage monitoring, and anticipates implementation during 2007.

SNC will provide updates to the NRC as necessary regarding any changes to the VEGP leakage monitoring program by March 31, 2007.

VEGP-2
Examination and Mitigation Information Table
Examination and Mitigation Summary for Alloy 82 Pressurizer Butt Welds

Nozzle		MRP-139 Volumetric Examination Requirement Met or to be Met		Mitigation Completed or to be Completed	Comments
Function / Designation	Susceptible Material Description	Outage Designation	Start Date (MM/YYYY)	Outage Designation	
Spray 21201-V6-002-W21	(1) (2) (3) & (4) Alloy 82	2R12	03/2007	2R12	Mitigate by weld overlay
Surge 21201-V6-002-W22	(1) (2) & (3) Alloy 82	2R12	03/2007	2R12	Mitigate by weld overlay
Safety 1 21201-V6-002-W17	(1) & (2) Alloy 82	2R12	03/2007	2R12	Mitigate by weld overlay
Safety 2 21201-V6-002-W18	(1) & (2) Alloy 82	2R12	03/2007	2R12	Mitigate by weld overlay
Safety 3 21201-V6-002-W19	(1) & (2) Alloy 82	2R12	03/2007	2R12	Mitigate by weld overlay
Relief 21201-V6-002-W20	(1) & (2) Alloy 82	2R12	03/2007	2R12	Mitigate by weld overlay

- (1) Nozzle-to-safe end butter
- (2) Nozzle-to-safe end weld
- (3) Thermal sleeve-to-safe end weld
- (4) Liner weld-to-safe end butter

Enclosure 3

**Joseph M. Farley Nuclear Plant
Vogtle Electric Generating Plant**

List of Regulatory Commitments

Enclosure 3

Joseph M. Farley Nuclear Plant
Vogtle Electric Generating Plant

List of Regulatory Commitments

The following table identifies those actions committed to by Southern Nuclear Operating Company in this document for Farley Nuclear Plant and Vogtle Electric Generating Plant. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

Commitment	Type		Scheduled Completion Date (If Required)
	One-Time Action	Continuing Compliance	
FNP-1 will perform MRP-139 mitigation and post-mitigation examination activities on the pressurizer nozzles by the end of the 1R21 outage (Fall 2007).	X		End of 1R21 Outage
FNP-2 will perform MRP-139 required examinations on the pressurizer Alloy 82/182 butt welds during the 2R18 outage (Spring 2007).	X		End of 2R18 Outage
FNP-2 will perform MRP-139 mitigation and post-mitigation examination activities on the pressurizer nozzles by the end of the 2R20 outage (Spring 2010).	X		End of 2R20 Outage
VEGP-1 will perform MRP-139 mitigation and post-mitigation examination activities on the pressurizer nozzles during the 1R14 outage (Spring 2008).	X		End of 1R14 Outage
For VEGP-1, SNC will accelerate the planned mitigation outage, currently scheduled for 2008, if analytical results do not demonstrate that current schedules are adequate.	X		December 31, 2007
For VEGP-1, plans for any additional capability which reliably and meaningfully adds to the ability to diagnose primary system leakage, as well as installation schedules as appropriate, will be submitted to the NRC.	X		May 31, 2007
VEGP-2 will perform MRP-139 mitigation and post-mitigation examination activities on the pressurizer nozzles during the 2R12 outage (Spring 2007).	X		End of 2R12 Outage

Enclosure 3

Joseph M. Farley Nuclear Plant
Vogtle Electric Generating Plant

List of Regulatory Commitments

Commitment	Type		Scheduled Completion Date (If Required)
	One-Time Action	Continuing Compliance	
If a shut down occurs due to excessive primary system unidentified leakage, and if the leakage cannot be confirmed to originate from a source other than the pressurizer nozzles, a bare metal visual examination of Alloy 82/182 weld locations on the pressurizer will be performed to determine whether the leakage originated at those locations (FNP & VEGP).		X	Ongoing until mitigation of pressurizer Alloy 82/182 welds
Examinations of pressurizer weld overlays will be performed in accordance with MRP-139 and/or NRC-approved alternatives (FNP & VEGP).		X	
The results of future inspections or mitigations of pressurizer Alloy 82/182 butt weld locations will be reported to the NRC within 60 days of startup from the outage during which they are performed (FNP & VEGP).		X	End after two consecutive acceptable examinations
Processes described in Enclosures 1 & 2 for monitoring primary system leakage will be used until Alloy 82/182 butt weld locations on the pressurizer have been mitigated or examined (FNP & VEGP).		X	Until mitigated or examined.
SNC will provide updates to the NRC as necessary regarding any changes to the FNP & VEGP leakage monitoring programs.	X		March 31, 2007