

May 29, 2008

Mr. Tom E. Tynan
Vice President - Vogtle
Vogtle Electric Generating Plant
7821 River Road
Waynesboro, GA 30830

SUBJECT: VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2 - GENERIC LETTER 2004-02, "POTENTIAL IMPACT OF DEBRIS BLOCKAGE ON EMERGENCY RECIRCULATION DURING DESIGN BASIS ACCIDENTS AT PRESSURIZED-WATER REACTORS," EXTENSION REQUEST APPROVAL (TAC NOS. MC4727, MC4728)

Dear Mr. Tynan:

The U. S. Nuclear Regulatory Commission (NRC) staff evaluated a request from the Southern Nuclear Operating Company (SNC, the licensee) for an extension of the Vogtle Electric Generating Plant, Units 1 and 2 (VEGP), sump clogging corrective actions due date for resolution of issues related to Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors." The NRC staff has reviewed your letter dated May 21, 2008 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML081430616), and supplemental letter dated May 22, 2008, (ADAMS Accession No. ML081430154), supporting a request for an extension of the VEGP, Units 1 and 2, sump clogging corrective actions due dates previously specified in an NRC letter dated December 19, 2007, (ADAMS Accession No. ML073520145). The NRC staff determined that it is acceptable for VEGP to extend the due date for completion of corrective actions and modifications, until July 31, 2008. The NRC staff evaluation of extension is enclosed.

Please contact me at 301-415-2728 with any questions.

Sincerely,

/RA/

R. A. Jervey, Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-424 and 50-425

Enclosure:
As stated

cc w/encl: See next page

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ADAMS Accession No.ML081490366

*transmitted by memo dated

OFFICE	NRR/LPL2-1/PM	NRR/LPL2-1/LA	NRR/SSIB/BC *	NRR/LPL2-1/BC
NAME	RJervey	GLappert	MScott	MWong
DATE	5/29/08	5/28/08	5/28/08	5/29/08

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EVALUATION OF EXTENSION REQUEST TO COMPLETE CORRECTIVE ACTIONS

GENERIC SAFETY ISSUE-191, "ASSESSMENT OF DEBRIS

ACCUMULATION ON PWR SUMP PUMP PERFORMANCE" (GSI-191)/

GENERIC LETTER 2004-02, "POTENTIAL IMPACT OF DEBRIS BLOCKAGE ON EMERGENCY

RECIRCULATION DURING DESIGN BASIS ACCIDENTS AT PRESSURIZED WATER

REACTORS" (GL 2004-02)

VOGTLE ELECTRIC GENERATING PLANT UNITS 1 AND 2

DOCKET NO. 50-424, 50-425

By letter dated May 22, 2008, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML081430616), Southern Nuclear Operating Company (SNC, the licensee), requested an extension to the U.S. Nuclear Regulatory Commission (NRC) Generic Letter (GL) 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors" corrective action due dates for Vogtle Electric Generating Plant (VEGP) Units 1 and 2. The stated intent of this extension was to allow additional time for completion of downstream effects evaluations in accordance with WCAP-16406-P Rev. 1, "Evaluation of Downstream Sump Debris Effects in Support of GSI-191" and WCAP-16793-NP, "Evaluation of Long-Term Cooling Considering Particulate, Fibrous and Chemical Debris in the Recirculating Fluid," and completion of chemical effects testing and evaluation of test results. SNC requested an extension to July 31, 2008.

In the licensee's letter dated May 21, 2008 ADAMS Accession No. ML081430154, SNC requested an extension in time to implement a license amendment request (LAR) for new Technical Specification (TS) values for the refueling water storage tank (RWST) minimum volume and semi-automatic switchover values. SNC requested an extension to 30 days from receipt of the NRC's approval of the LAR.

The NRC had previously approved an extension for completion of VEGP Units 1 and 2 sump clogging corrective actions from the GL 2004-02 due date of December 31, 2007, until May 31, 2008 NRC letter dated December 19, 2007 (ADAMS Accession No. ML073520145).

SNC's letter dated May 22, 2008, stated that the request for an additional extension for chemical effects and downstream effects evaluations is due to chemical effects testing scheduling issues (previous tests ran late and test facility maintenance, revised tests to answer NRC concerns with Vuez testing), and test equipment problems (scanning electron microscope (SEM) issues) that have caused delays in being able to meet the May 31, 2008 submittal date. The licensee explained that Alion is working SEM issues in parallel by looking for alternate paths (i.e., fix SEM or find alternate one that is available). The licensee also stated that downstream effects analyses cannot be completed until June 30, 2008.

SNC's letter dated May 21, 2008, stated that the request for an additional extension for implementation of the TS change is due to delays and complications regarding the approval and implementation of the proposed new RWST Level-Low Low Nominal Trip Setpoint and Allowable Values. The licensee explained that there is necessary design change work involved in making the setpoint changes, which is contingent on receipt of NRC's approval. Other required activities include revisions to maintenance, and administrative procedures, as well as the applicable personnel training.

SNC stated, in a teleconference held with the NRC on May 8, 2008, that the facility modifications described in the earlier extension requests remain as discussed in the extension approval letter cited above.

The NRC based the reviews for granting extensions to the due date for completion of GL 2004-02 corrective actions on the criteria stated in SECY-06-0078. Specifically, an extension may be granted if:

- the licensee has a plant-specific technical/experimental plan with milestones and schedule to address outstanding technical issues with enough margin to account for uncertainties, and
- the licensee identifies mitigative measures to be put in place prior to December 31, 2007, and adequately describes how these mitigative measures will minimize the risk of degraded emergency core cooling system (ECCS) and containment spray system (CSS) functions during the extension period.

The SECY-06-0078 also states that for proposed extensions beyond several months, a licensee's request will more likely be accepted if the proposed mitigative measures include temporary physical improvements to the ECCS sump or materials inside containment to better ensure a high level of ECCS sump performance.

With regard to the first extension criterion, SNC provided a plant-specific technical/experimental plan, with milestones and schedules, to complete the GL 2004-02 corrective actions. The licensee-proposed plan for the remaining corrective actions has been previously summarized and referenced in the previous VEGP Units 1 and 2 NRC extension approval letter cited above. The licensee stated, in letter dated May 22, 2008, the downstream effects analyses will be completed by June 30, 2008. In regards to the completion of chemical effects testing, SNC stated that the Alion analysis is in progress and is expected to be submitted to General Electric Hitachi (GEH) by June 10, 2008. The GEH test report is scheduled to be transmitted to SNC by July 1, 2008. The licensee stated in letter dated May 21, 2008, that it has staged the necessary design change work regarding the RWST level setpoint modification, that applicable procedures are prepared for implementation, and that applicable personnel training is prepared.

With regard to the second extension criterion, the licensee stated in its letter dated December 7, 2007 ADAMS Accession No. ML073440044, that modifications, mitigation measures, compensatory measures, and/or favorable conditions are in effect at VEGP Units 1 and 2, minimizing the risk of degraded ECCS and CSS functions during the extension period. The staff evaluation of the previous extension request concluded that SNC had put mitigation measures in place at VEGP Units 1 and 2 to adequately reduce risk for the previous requested extension period (May 31, 2008), as stated in the NRC extension approval letter cited above.

In letter dated May 22, 2008, SNC stated that the justification for an extension request for the final GL 2004-02 submittal to July 31, 2008 remains the same as the justification from the SNC letter to the NRC dated December 7, 2007. As an update to the December 7, 2007, letter, the VEGP Unit 1 ECCS flow orifices have been installed.

The NRC staff believes that SNC has a reasonable plan for VEGP Units 1 and 2 that should result in the completion of final GL 2004-02 corrective actions that provide acceptable strainer function with adequate margin for uncertainties. The additional time requested in the May 21 and 22, 2008, letters is short and considered to be of low safety concern given the mitigation measures and plant improvements already in place. Based on the licensee having satisfactorily addressed the NRC GL 2004-02 due date extension criteria as discussed above, the Safety Issue Resolution Branch (SSIB) finds it is acceptable to extend the completion date for GL 2004-02 corrective actions for VEGP Units 1 and 2 to July 31, 2008, for corrective actions associated with downstream effects and chemical effects evaluations and testing, as described in this enclosure. Furthermore, SSIB finds it is acceptable to extend the completion date for implementation of the new TS values for the RWST minimum volume and semi-automatic switchover values, as described in this enclosure, to 30 days from receipt of the NRC's approval of the associated LAR. While the NRC accepts these dates as reasonable allowance for contingencies regarding completion of remaining activities to address GL 2004-02, the NRC expects VEGP to place a high priority on completing remaining actions and updating the plants' licensing bases as soon as possible. In addition, the NRC expects that the actions dependent on approval of a license amendment will be implemented expeditiously after receipt of the amendment.

In a phone conversation on May 27, 2008, the licensee stated that VEGP Units 1 and 2 are in compliance with the Applicable Regulatory Requirements section of GL 2004-02 with respect to its existing licensing basis. The SNC commitment contained in letter dated May, 22, 2008, is for VEGP Units 1 and 2 to be in compliance with its new licensing basis, once all remaining GL 2004-02 corrective actions are completed by July 31, 2008.

Approval of the extension to the GL 2004-02 corrective action due date shall not be construed as approval of any operating license amendment described in the licensee's extension request.

Vogtle Electric Generating Plant, Units 1 & 2

cc:

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