

Tom Tynan
Vice President - Vogtle

**Southern Nuclear
Operating Company, Inc.**
7821 River Road
Waynesboro, Georgia 30830

Tel 706.826.3151
Fax 706.826.3321

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

**Vogtle Electric Generating Plant
License Renewal – LRA Amendment 3 and
Updated Future Action Commitment List**

Ladies and Gentlemen:

By letter dated June 27, 2007, Southern Nuclear Operating Company (SNC) submitted a License Renewal Application (LRA) for Vogtle Electric Generating Plant (VEGP) Units 1 and 2, seeking to extend the terms of the operating licenses an additional 20 years beyond the current expiration dates. Amendment 1 to the LRA was provided by letter dated March 20, 2008. Amendment 2 to the LRA was provided by letter dated June 26, 2008.

In response to RAIs and questions during audits and inspections, seven additional commitments were added to the VEGP License Renewal Future Action Commitment List submitted with Amendment 2 to the LRA. Enclosure 1 of this letter provides amendments to Appendix A of the LRA to incorporate these commitments into the UFSAR Supplement.

Enclosure 2 of this letter is the updated VEGP License Renewal Future Action Commitment List with references added for the applicable LRA sections of Appendix A.

(Affirmation and signature are provided on the following page.)

Mr. T. E. Tynan 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.

The NRC commitments contained in this letter are provided in Enclosure 2, Updated VEGP License Renewal Future Action Commitment List.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

T. E. Tynan

T. E. Tynan
Vice President – Vogtle

Sworn to and subscribed before me this 11th day of August, 2008.

Henry D. Chandler
Notary Public

Notary Public, Burke County, Georgia
My Commission Expires January 13, 2012

My commission expires: _____

TET/JEH/daj

Enclosures: 1. VEGP License Renewal Application Amendment 3
2. VEGP License Renewal Future Action Commitment List - Updated

cc: Southern Nuclear Operating Company

Mr. J. T. Gasser, Executive Vice President	w/o Enclosure
Mr. T. E. Tynan, Vice President – Vogtle	w/o Enclosure
Mr. D. H. Jones, Vice President – Engineering	w/o Enclosure
Mr. M. J. Ajluni, Manager, Nuclear Licensing	w/ Enclosure
Mr. N. J. Stringfellow, Licensing Supervisor, Vogtle	w/ Enclosure

RType: CVC7000

U. S. Nuclear Regulatory Commission

Mr. L. A. Reyes, Regional Administrator	w/ Enclosure
Mr. R. A. Jervy, NRR Project Manager – Vogtle	w/ Enclosure
Mr. G. J. McCoy, Senior Resident Inspector – Vogtle	w/ Enclosure

State of Georgia

Mr. N. Holcomb, Commissioner – Department of Natural Resources	w/ Enclosure
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**Vogtle Electric Generating Plant
License Renewal - LRA Amendment 3**

Enclosure 1

VEGP License Renewal Application Amendment 3

Vogtle Electric Generating Plant Units 1 and 2
Application for License Renewal – Amendment 3
Changes Resulting from Updated Future Action Commitment List
Provided in June 26, 2008 Letter

<p>Audit Question 4.3-14 RAI 4.3-2 RAI 4.3-04</p>	<p>Section A.2.38, page A-23 Add the following to the end of the section:</p> <ol style="list-style-type: none"> 5. SNC will revise the FatiguePro software to calculate a minimum projected value of 1 for any events that may potentially occur. 6. SNC will revise the FatiguePro initial CUF values for the Unit 1 and Unit 2 hot leg surge nozzles, pressurizer surge nozzles, and pressurizer heater penetrations to double the current values and recalculate the current and projected CUFs. 7. SNC will implement a fatigue management software program that uses six stress components in the stress-based fatigue calculation. The software will be appropriately benchmarked against an ASME NB-3200 fatigue analysis and the stress-based fatigue monitoring locations will be modeled with the as-built configuration. The new software will be used to re-project 60-year CUF values for the monitored locations. When those locations were evaluated for environmental effects on fatigue, the new software will also be used to demonstrate the environmental effects on fatigue will be adequately managed for those locations during the period of extended operation.
<p>Audit Question 4.7-01</p>	<p>Section A.3.6.1, page A-32 Add the following to the end of the section:</p> <p>WCAP-10551-P, Addendum 1 performed a LBB evaluation for the Units 1 and 2 primary loop piping that explicitly addressed the PWSCC concern for the Alloy 82/182 welds in this piping. However, the NRC has not yet accepted the process used as adequately addressing their concerns. Once the NRC has accepted a process for addressing PWSCC of Alloy 82/182 welds in LBB evaluations and at least two years prior to the period of extended operation, SNC will verify the LBB evaluation in WCAP-10551-P, Addendum 1 meets the conditions of that process or have it re-performed using the acceptable process.</p>
<p>Audit Question B.3.28-04</p>	<p>Section A.2.28, page A-18 Add the following to the end of the section:</p> <p>VEGP will monitor spent fuel pool aluminum concentrations to ensure the Boral spent fuel racks will continue to perform their intended function during the period of extended operation. If adverse trends are identified SNC will implement corrective actions. Additionally, SNC will monitor industry experience related to Boral and will take appropriate actions if significant degradation of Boral is identified.</p>

Vogtle Electric Generating Plant Units 1 and 2
Application for License Renewal – Amendment 3
Changes Resulting from Updated Future Action Commitment List
Provided in June 26, 2008 Letter

IP-71002 Inspection	<p>Section A.2.32, page A-19</p> <p>Add the following to the end of the section:</p> <ul style="list-style-type: none">• Guidance will be given regarding proper documentation of condition adverse to quality and its probable causes for any CR written against a finding during Structural Monitoring Program walkdown.• For any finding (e.g., crack, leakage, etc.) guidance will be given for data to be collected and evaluated.• More explicit direction will be given for trending of the problems.
IP-71002 Inspection	<p>Section A.2.30, page A-18</p> <p>Add the following to the end of the section:</p> <p style="padding-left: 40px;">Prior to the period of extended operation, the VEGP Inservice Inspection Program – IWE will be revised to provide more explicit direction to the Registered Professional Engineer for trending and evaluating conditions identified during concrete visual examinations.</p> <p>Section A.2.31, page A-19</p> <p>Add the following to the end of the section:</p> <p style="padding-left: 40px;">Prior to the period of extended operation, the VEGP Inservice Inspection Program – IWL will be revised to provide more explicit direction to the Registered Professional Engineer for trending and evaluating conditions identified during concrete visual examinations.</p>

**Vogtle Electric Generating Plant
License Renewal – LRA Amendment 3**

Enclosure 2

VEGP License Renewal Future Action Commitment List - Updated

VEGP License Renewal Future Action Commitment List - Updated

The following table identifies those actions committed by Southern Nuclear Operating Company in this document for Vogtle Electric Generating Plant.

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ITEM NO.	COMMITMENT	UFSAR SUPPLEMENT LOCATION	SCHEDULE	RELATED LRA SECTIONS/ REFS
1	Implement the ACCW System Carbon Steel Components Program as described in VEGP LRA Section B.3.1.	A.2.1	Prior to the period of extended operation	B.3.1
2	Implement the Bolting Integrity Program as described in VEGP LRA Section B.3.2.	A.2.2	Prior to the period of extended operation	B.3.2
3	Enhance Boric Acid Corrosion Control Program documents to address the effects of borated water leakage onto materials other than steels, including electrical components (e.g., electrical connectors), that are susceptible to boric acid corrosion.	A.2.3	Prior to the period of extended operation	B.3.3
4	Implement the Buried Piping and Tanks Inspection Program as described in VEGP LRA Section B.3.4.	A.2.4	Prior to the period of extended operation	B.3.4
5	Implement the CASS RCS Fitting Evaluation Program as described in VEGP LRA Section B.3.5.	A.2.5	Prior to the period of extended operation	B.3.5

VEGP License Renewal Future Action Commitment List - Updated

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ITEM NO.	COMMITMENT	UFSAR SUPPLEMENT LOCATION	SCHEDULE	RELATED LRA SECTIONS/ REFS
6	Enhance Closed Cooling Water Program documents to indicate the components in each system that are most susceptible to various corrosion mechanisms and to ensure that corrosion monitoring is appropriately accomplished. This qualitative assessment will be based on an understanding of corrosion principles associated with closed cooling water chemistries and on review of system, plant, and industry operating experience. Parameters considered in the review will include system flow parameters (focusing on identification of stagnant regions and on intermittently operated systems), normal operating temperatures, and component geometries (e.g. creviced areas).	A.2.6	Prior to the period of extended operation	B.3.6
7	Implement the External Surfaces Monitoring Program as described in VEGP LRA Section B.3.8.	A.2.8	Prior to the period of extended operation	B.3.8

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ITEM NO.	COMMITMENT	UFSAR SUPPLEMENT LOCATION	SCHEDULE	RELATED LRA SECTIONS/ REFS
8	<p>Implement the following enhancements to the Fire Protection Program:</p> <ul style="list-style-type: none"> • Wall thickness evaluations will be performed on water suppression piping systems using non-intrusive volumetric testing or visual inspections to ensure that wall thicknesses are within acceptable limits. Initial wall thickness evaluations will be performed before the end of the current operating term. Subsequent evaluations will be performed at plant specific intervals during the period of extended operation. The plant specific inspection intervals will be determined based on previous evaluations and site operating experience. • A sample of sprinkler heads will be inspected using the guidance of NFPA 25 "Inspection, Testing and Maintenance of Water-Based Fire Protection Systems" (1998 Edition), Section 2-3.1.1, or NFPA 25 (2002 Edition), Section 5.3.1.1.1. Where sprinkler heads have been in service for 50 years, they will be replaced or representative samples from one or more sample areas will be submitted to a recognized testing laboratory for field service testing. This sampling will be performed every 10 years after the initial field service testing. The 50 years of time in service begins when the system was placed in service, not when the plant became operational. • Fire Protection Program procedures will be revised to provide more detailed instructions for visual inspection of Fire Pump Diesel fuel supply lines for leakage, corrosion, and general degradation while the engine is running during fire suppression system pump tests. 	A.2.9	<p>Prior to the period of extended operation, except for sprinkler head replacement or testing;</p> <p>Sprinkler head replacement or testing will be implemented prior to 50 years from time system was placed in service.</p>	B.3.9

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ITEM NO.	COMMITMENT	UFSAR SUPPLEMENT LOCATION	SCHEDULE	RELATED LRA SECTIONS/ REFS
9	Enhance the Flux Thimble Tube Inspection Program by preparing an overall program procedure documenting the Flux Thimble Tube Inspection Program administration and implementing activities credited for license renewal.	A.2.11	Prior to the period of extended operation	B.3.11
11	Implement the following enhancements to the Generic Letter 89-13 Program: <ul style="list-style-type: none"> • Develop an overall program procedure for the Generic Letter 89-13 Program to describe the various program activities that comprise Generic Letter 89-13 Program and their implementing controls such as chemistry procedures, maintenance activities, scheduled surveillances, or other mechanisms. • Add inspection of the NSCW Transfer Pumps' casings and bolting. • Add the NSCW Cooling Tower spray nozzles as a specific item to be inspected during the cooling tower inspection. 	A.2.12	Prior to the period of extended operation	B.3.12

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ITEM NO.	COMMITMENT	UFSAR SUPPLEMENT LOCATION	SCHEDULE	RELATED LRA SECTIONS/ REFS
12	<p>Implement the Nickel Alloy Management Program for Non-Reactor Vessel Closure Head Penetration Locations as described in VEGP LRA Section B.3.14.</p> <p>The program will be based on the following commitments:</p> <ul style="list-style-type: none"> (1) SNC will continue to participate in industry initiatives directed at resolving PWSCC issues, such as owner’s group programs and the Electric Power Research Institute Materials Reliability Program. This is an ongoing commitment. (2) SNC will comply with applicable NRC Orders. This is an ongoing commitment. (3) SNC will submit a program inspection plan for VEGP that includes implementation of applicable Bulletins, Generic Letters, and staff accepted industry guidance. The inspection plan will also include assessments of each of the ten aging management program elements defined in Section A.1.2.3 of NUREG-1800 Revision 1. The inspection plan will be submitted to the staff for review and approval not less than 24 months prior to entering the period of extended operation for VEGP Units 1 and 2. 	A.2.14	<p>Program implementation to be completed prior to the period of extended operation</p> <p>Numbered items are implemented as noted in the item.</p>	B.3.14
13	<p>The Nickel Alloy Management Program for Reactor Vessel Closure Head Penetrations will implement commitments for reactor vessel closure head penetrations associated with nickel alloys from:</p> <ul style="list-style-type: none"> (1) NRC Orders, Bulletins, and Generic Letters, and; (2) Staff-accepted industry guidelines. 	A.2.15	Ongoing	B.3.15

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ITEM NO.	COMMITMENT	UFSAR SUPPLEMENT LOCATION	SCHEDULE	RELATED LRA SECTIONS/ REFS
14	Implement the following enhancements to the Oil Analysis Program: <ul style="list-style-type: none"> • An overall program procedure or guideline will be prepared to formalize the sampling and analysis activities performed. • Viscosity, relative level of oxidation, and flash point of lubricating oil samples will be determined for components where the lubricating oil is changed based on its analyzed condition (instead of being changed on a regular schedule regardless of condition). The relative level of oxidation of the lubricating oil will be monitored by analysis of the neutralization number or other appropriate parameter(s). Flash point monitoring will be performed for those components which have the potential for contamination of the lubricating oil with a light hydrocarbon such as fuel oil. • For both components with periodic lubricating oil changes and components where the lubricating oil is changed based on analyzed condition, if a lubricating oil sample exceeds the limits established for the wear metal content screening, the lubricating oil from that component will be subjected to additional testing. The additional testing may include detailed particle counting, elemental analysis, or analytical ferrography as necessary to validate the initial screening results and to diagnose the source of the particulates. 	A.2.16	Prior to the period of extended operation	B.3.16

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ITEM NO.	COMMITMENT	UFSAR SUPPLEMENT LOCATION	SCHEDULE	RELATED LRA SECTIONS/ REFS
15	Implement the One-Time Inspection Program as described in VEGP LRA Section B.3.17.	A.2.17	Inspections will be performed within a window of ten years immediately preceding the period of extended operation.	B.3.17
16	Implement the One-Time Inspection Program for ASME Class 1 Small Bore Piping as described in VEGP LRA Section B.3.18.	A.2.18	Inspections will be performed within a window of ten years immediately preceding the period of extended operation.	B.3.18

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ITEM NO.	COMMITMENT	UFSAR SUPPLEMENT LOCATION	SCHEDULE	RELATED LRA SECTIONS/ REFS
17	Implement the One-Time Inspection Program for Selective Leaching as described in VEGP LRA Section B.3.19.	A.2.19	Inspections will be performed within a window of ten years immediately preceding the period of extended operation.	B.3.19
18	Enhance the Periodic Surveillance and Preventive Maintenance Activities to include the following: <ul style="list-style-type: none"> • Steam Generator Blowdown Secondary Sample Bath Shell inspections • Steam Generator Blowdown Corrosion Product Monitor cooler shell inspections • Potable Water System water heater housing inspections (for the in-scope water heaters) 	A.2.21	Prior to the period of extended operation	B.3.21
19	Implement the Piping and Duct Inspection Program as described in LRA Section B.3.22.	A.2.22	Prior to the period of extended operation	B.3.22

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ITEM NO.	COMMITMENT	UFSAR SUPPLEMENT LOCATION	SCHEDULE	RELATED LRA SECTIONS/ REFS
20	<p>Implement the Reactor Vessel Internals Program as described in LRA Section B.3.24.</p> <p>The program will be based on the following commitments:</p> <ul style="list-style-type: none"> (1) SNC will participate in the industry program for investigating and managing aging effects on reactor internals. This is an ongoing commitment. (2) SNC will evaluate and implement the results of the industry programs, such as the Electric Power Research Institute Material Reliability Program, as applicable to the VEGP reactor internals. This commitment will be fully implemented prior to the period of extended operation. (3) SNC will submit an inspection plan for the VEGP reactor internals to the NRC for review and approval not less than 24 months before entering the period of extended operation for VEGP Units 1 and 2. This inspection plan will address the bases, inspection methods, and acceptance criteria associated with aging management of the reactor vessel thermal sleeves and the core support lugs (along with the associated support pads and attachment welds). 	A.2.24	<p>Program implementation to be completed prior to the period of extended operation;</p> <p>Numbered items are implemented as noted in the item.</p>	B.3.24

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ITEM NO.	COMMITMENT	UFSAR SUPPLEMENT LOCATION	SCHEDULE	RELATED LRA SECTIONS/ REFS
21	Implement the following enhancements to the Reactor Vessel Surveillance Program: (1) Prior to completion of testing of the last surveillance capsule in each unit, action will be taken to ensure that tested and untested specimens from all capsules removed from the VEGP reactor vessels remain in storage. (2) Alternate dosimetry will be installed to monitor neutron fluence on the reactor vessel after removal of the last surveillance capsule in that unit. This enhancement will be implemented prior to removal of the last surveillance capsule in each unit.	A.2.25	As noted in the numbered items	B.3.25

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ITEM NO.	COMMITMENT	UFSAR SUPPLEMENT LOCATION	SCHEDULE	RELATED LRA SECTIONS/ REFS
23	Implement the following enhancements to the Structural Monitoring Program: <ul style="list-style-type: none"> • The scope of the Structural Monitoring Program will be expanded to include the additional structures that require monitoring for license renewal. • The scope of inspection for structures that require monitoring for license renewal will be clarified. An area-based inspection will be performed unless a detailed inspection scope is provided. • The Structural Monitoring Program scope for hangers and supports will be clarified. • Program requirements will be revised to include periodic ground water monitoring to confirm that groundwater chemistry remains non-aggressive as defined in NUREG 1801. • Underwater inspection of the NSCW cooling tower basins, including appropriate inspection and acceptance criteria, will be added to the Structural Monitoring Program. 	A.2.32	Prior to the period of extended operation	B.3.32
24	Enhance the Structural Monitoring Program - Masonry Walls to include monitoring of masonry walls in the structures that are in scope for license renewal, but are not currently monitored under the program.	A.2.33	Prior to the period of extended operation	B.3.33

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ITEM NO.	COMMITMENT	UFSAR SUPPLEMENT LOCATION	SCHEDULE	RELATED LRA SECTIONS/ REFS
25	Implement the Non-EQ Cables and Connections Program as described in LRA Section B.3.34.	A.2.34	Implement program and complete first inspection prior to the period of extended operation	B.3.34
26	Implement the Non-EQ Inaccessible Medium-Voltage Cables Program as described in LRA Section B.3.35.	A.2.35	Implement program and complete first inspection prior to the period of extended operation	B.3.35

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ITEM NO.	COMMITMENT	UFSAR SUPPLEMENT LOCATION	SCHEDULE	RELATED LRA SECTIONS/ REFS
27	Implement the Non-EQ Cable Connections One-Time Inspection Program as described in LRA Section B.3.36.	A.2.36	Inspections will be performed within a window of five years immediately preceding the period of extended operation.	B.3.36

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ITEM NO.	COMMITMENT	UFSAR SUPPLEMENT LOCATION	SCHEDULE	RELATED LRA SECTIONS/ REFS
28	Implement the following enhancements to the Fatigue Monitoring Program: <ul style="list-style-type: none"> • Implementing documents will be revised to address the effect of the full structural weld overlays applied to the pressurizer spray and surge nozzles on the stress-based module calculation of CUF. • The VEGP UFSAR will be revised to require fatigue monitoring of the Accumulator/RHR nozzles and pressurizer heater penetrations. • Implementing documents will be revised to reduce acceptable CUF values to account for environmental fatigue effects for those NUREG-6260 locations monitored for fatigue. • The implementing procedure for the Fatigue Monitoring Program will be enhanced to explicitly require that the corrective action initiated for exceeding the acceptance criteria of a CUF less than or equal to 1.0 includes a review to identify and assess any additional affected reactor coolant pressure boundary locations. 	A.2.38	No later than two years prior to the period of extended operation	B.3.38

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ITEM NO.	COMMITMENT	UFSAR SUPPLEMENT LOCATION	SCHEDULE	RELATED LRA SECTIONS/ REFS
29	<p>To ensure that the fatigue cycle limits are not exceeded, SNC will replace the steam generator secondary side handhole bolts after 30 years of service. The handhole bolts have been previously replaced and are scheduled to be replaced again during the spring outages in 2026 and 2028 for Units 1 and 2, respectively.</p> <p>Alternatively, a less restrictive replacement schedule may be developed and documented based on potential updated analyses initiated by the Bolting Integrity Program.</p>	A.3.2.5	As stated in the commitment	4.3.5 B.3.2
30	<p>To ensure that the fatigue cycle limits are not exceeded, SNC will replace the steam generator secondary side manway bolts after 30 years of service. The manway bolts have never been replaced and are scheduled for replacement during the spring outages in 2017 and 2019 for Units 1 and 2, respectively.</p> <p>Alternatively, a less restrictive replacement schedule may be developed and documented based on potential updated analyses initiated by the Bolting Integrity Program.</p>	A.3.2.5	As stated in the commitment	4.3.5 B.3.2
31	<p>The VEGP Pressure-Temperature Limits Report (for each unit) will be updated to address neutron embrittlement for a 60-year operating life, including any changes to the cold-overpressure mitigation system setpoints.</p>	A.3.1.5 A.3.6.4	Prior to the unit entering the period of extended operation	4.2.5 4.7.4

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ITEM NO.	COMMITMENT	UFSAR SUPPLEMENT LOCATION	SCHEDULE	RELATED LRA SECTIONS/ REFS
32	Implement a replacement schedule for the small diameter (\leq 2-inch) flexible hoses described below: <ul style="list-style-type: none"> • Radiation Monitoring System flexible hoses associated with the vent stack radiation monitor sample line. • Emergency Diesel Generator System flexible hoses associated with the fuel oil supply lines from the fuel oil headers to the fuel injector pumps. • ACCW System flexible hoses associated with the normal charging pump motor coolers. • Hydrogen Recombiner and Monitoring System flexible hoses associated with the calibration gas and oxygen bottles. • Main Steam System flexible hoses between the ARV hydraulic actuator and the hand pump unit. • Drain System flexible hoses installed on the Containment Bldg Tendon Gallery Sump Pump discharge lines. • Fire Protection System flexible hoses associated with the fire pump diesel fuel oil system. 	None	Prior to the period of extended operation	2.3.3.25 2.3.3.20 2.3.3.6 2.3.3.20 2.3.4.1 2.3.3.23 2.3.3.19

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ITEM NO.	COMMITMENT	UFSAR SUPPLEMENT LOCATION	SCHEDULE	RELATED LRA SECTIONS/ REFS
33	Ensure the fatigue monitoring limits implemented as part of the Fatigue Monitoring Program are adequate to ensure that charging and letdown intermediate break location CUF values remain less than 0.1 for 60 years of operation.	A.3.2.1	No later than two years prior to the period of extended operation	4.3.1.7

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34	<p>The cranes within the scope of the Overhead and Refueling Crane Inspection Program are routinely inspected; however the existing procedures do not explicitly identify inspection of structural components for excessive wear, corrosion, and misalignment in all cases. As a result, SNC will enhance applicable plant procedures to explicitly identify inspection of crane rails and crane structural components for loss of material due to corrosion and wear, and for indication of rail misalignment:</p> <ul style="list-style-type: none"> a) Procedure 93246-C "Polar Crane" will be enhanced to include inspection of crane rails and crane structural components (e.g., bridge) for loss of material due to corrosion; inspection of crane rails for loss of material due to wear, and for indication of rail misalignment. b) Procedure 27315-C "Spent Fuel Cask Crane" will be enhanced to include inspection of crane rails for loss of material due to corrosion. c) Procedure 27340-C "Refueling Machine" will be enhanced to include inspection of crane rails and crane structural components (e.g., bridge) for loss of material due to corrosion, and for indication of rail misalignment. d) Procedure 27342-C "Fuel Handling Machine Bridge Crane" will be enhanced to include inspection of crane rails and crane structural components (e.g., bridge) for loss of material due to corrosion; inspection of crane rails for loss of material due to wear, and for indication of rail misalignment. 	A.2.20	Prior to the period of extended operation	B.3.20

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ITEM NO.	COMMITMENT	UFSAR SUPPLEMENT LOCATION	SCHEDULE	RELATED LRA SECTIONS/ REFS
35	This is a new commitment in response to Audit Question 4.3-14. SNC will revise the FatiguePro software to calculate a minimum projected value of 1 for any events that may potentially occur.	A.2.28	No later than two years prior to the period of extended operation	A.2.28
36	This is a new commitment in response to Audit Question 4.7-01. Once the NRC has accepted a process for addressing PWSCC of Alloy 82/182 welds in LBB evaluations, SNC will verify the LBB evaluation in WCAP-10551-P, Addendum 1 meets the conditions of that process or have it re-performed using the acceptable process.	A.3.6.1	No later than two years prior to the period of extended operation	A.3.6.1
37	This is a new commitment in response to Audit Question B.3.28-04. To ensure the Boral spent fuel racks will continue to perform their intended function during the period of extended operation, VEGP will monitor spent fuel pool aluminum concentrations and implement corrective actions if adverse trends are identified. Additionally, SNC will monitor industry experience related to Boral and will take appropriate actions if significant degradation of Boral is identified.	A.2.28	Prior to the period of extended operation	A.2.28

VEGP License Renewal Future Action Commitment List - Updated

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Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

ITEM NO.	COMMITMENT	UFSAR SUPPLEMENT LOCATION	SCHEDULE	RELATED LRA SECTIONS/ REFS
38	<p>This is a new commitment in response to RAI 4.3-2.</p> <p>SNC commits to revise the FatiguePro initial CUF values for the Unit 1 and Unit 2 hot leg surge nozzles, pressurizer surge nozzles, and pressurizer heater penetrations to double the current values and recalculate the current and projected CUFs.</p>	A.2.28	No later than two years prior to entering the period of extended operation.	A.2.28
39	<p>This is a new commitment in response to RAI 4.3-04.</p> <p>SNC commits to implement a fatigue management software program that uses six stress components in the stress based fatigue calculation. The software will be appropriately benchmarked against an ASME NB-3200 fatigue analysis and the stress based fatigue monitoring locations will be modeled with the as-built configuration. The new software will be used to re-project 60-year CUF values for the monitored locations. When those locations were evaluated for environmental effects on fatigue, the new software will also be used to demonstrate the environmental effects on fatigue will be adequately managed for those locations during the period of extended operation. This software will be put in service at least two years prior to the period of extended operation.</p>	A.2.28	No later than two years prior to entering the period of extended operation.	A.2.28

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ITEM NO.	COMMITMENT	UFSAR SUPPLEMENT LOCATION	SCHEDULE	RELATED LRA SECTIONS/ REFS
40	<p>This is a new commitment in response to a question raised during the IP-71002 inspection.</p> <p>The following changes will be made to the Structural Monitoring Program in order to enhance evaluation and trending of findings:</p> <ol style="list-style-type: none"> 1) Guidance will be given regarding proper documentation of condition adverse to quality and its probable causes for any CR written against a finding during structural monitoring program walkdown. 2) For any finding (e.g., crack, leakage, etc.) guidance will be given for data to be collected and evaluated. 3) More explicit direction will be given for trending of the problems. 	A.2.32	No later than two years prior to the period of extended operation	A.2.32
41	<p>This is a new commitment in response to a question raised during the IP-71002 inspection.</p> <p>The following changes will be made to the IWE and IWL programs in order to enhance evaluation and trending of findings:</p> <ol style="list-style-type: none"> 1) More explicit direction will be given to the Registered Professional Engineer for trending and evaluating conditions (including evidence of tendon grease leakage) identified during concrete visual examinations. 	A.2.30 A.2.31	No later than two years prior to the period of extended operation	A.2.30 A.2.31