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SOUTHERN COMPANY
*Energy to Serve Your World*

September 11, 2009

Docket Nos.: 50-424
50-425

NL-09-1411

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

Vogtle Electric Generating Plant
License Amendment Request to Revise Technical Specification (TS) Sections 5.5.9, "Steam Generator (SG) Program" and TS 5.6.10, "Steam Generator Tube Inspection Report" for Interim Alternate Repair Criteria

Ladies and Gentlemen:

On May 19, 2009, Southern Nuclear Operating Company (SNC) submitted a license amendment request to revise Vogtle Electric Generating Plant (VEGP) Technical Specification (TS) 5.5.9, "Steam Generator (SG) Program", and TS 5.6.10, "Steam Generator Tube Inspection Report." The proposed changes would revise the inspection scope and repair requirements of TS 5.5.9, "Steam Generator (SG) Program", and the reporting requirements of TS 5.6.10, "Steam Generator Tube Inspection Report." The proposed changes would establish a permanent alternate repair criterion to exclude portions of the tube below the top of the steam generator tube sheet from periodic steam generator tube inspections. Westinghouse WCAP-17071-P, Revision 0, "H*: Alternate Repair Criteria for the Tubesheet Expansion Region in Steam Generators with Hydraulically Expanded Tubes (Model F)," was submitted as enclosure 5 and provides the basis for the proposed change.

On July 10, 2009, SNC received a request for additional information (RAI) letter, which contained twenty-four (24) questions. As a result of a teleconference with NRC staff held on July 30, 2009, SNC received a second request for additional information letter on August 5, 2009. The August 5, 2009 letter contained three (3) questions related to questions 4, 20 and 24 from RAI letter received on July 10, 2009. The August 5, 2009 letter also contained one (1) additional question.

On August 28, 2009, SNC provided the responses to questions 1 through 24 of the July 10, 2009 letter and questions 1 through 4 of the August 5, 2009 letter.

On September 2, 2009, in a teleconference between NRC Staff and industry personnel, NRC Staff indicated that their concerns with eccentricity of the tube sheet tube bore in normal and accident conditions (RAI question 4 of the July 10, 2009 letter and RAI question 1 of the August 5, 1009 letter) have not been

completely resolved to the satisfaction of the Staff. The Staff further indicated that there was insufficient time to resolve these issues to support approval of the permanent amendment request to support the fall 2009 refueling outage. As such, SNC is proposing to revise the proposed changes to the technical specification contained in May 18, 2009 letter to be a one-time change to TS 5.5.9 and TS 5.6.10 for Unit 1 during Refueling Outage 15 and the subsequent operating cycle and for Unit 2 during Refueling Outage 14 and the subsequent operating cycle. SNC requests that the Staff provide the specific questions remaining to be resolved and that the review of the amendment request for permanent alternate repair criteria continues.

The permanent H* submittal is based on maintaining structural and leakage integrity in the event of an accident.

From a structural perspective, the 13.1 inch value of H* ensures that tube rupture or tube pull out from the tube sheet will not occur in the event of an accident in the entire life of the plant. Even in the event that all tubes in the steam generator have a 360 degree sever at 13.1 inches, structural integrity of the steam generator tube bundle will be maintained. This assumption bounds the current status of the Vogtle 1 and 2 steam generators with significant margin.

At Vogtle, tube flaw indications within the tube sheet have only been found at the hot leg tube ends and in bulges/overexpansions. Approximately 18,274 tube ends have been recently inspected at Vogtle. Twenty-seven flaw indications have been found in the inspections within 1 inch of the tube end. All of these indications were small and none met the tube repair criteria in the current technical specifications.

While flaws in bulges/overexpansions have been found at Vogtle 1, a separate inspection program for these indications has been implemented at both Vogtle 1 and 2. This inspection program is in accordance with Vogtle's current technical specifications and industry guidance.

Based on these inspections, a limited number of flaws existed in the tube sheets of Vogtle steam generators. The flaws that have been found are associated with residual stress conditions at either the tube ends or bulges/overexpansions within the tube sheet. No indications of a 360 degree sever has been detected in any steam generator at Vogtle. Consequently, the level of degradation in the Vogtle steam generators is very limited compared to the assumption of "all tubes severed" that was utilized in the development of the permanent H*. Consequently, structural integrity will be assured for the operating period between inspections allowed by TS 5.5.9, "Steam Generator (SG) Program".

From a leakage perspective, projections of accident induced steam generator tube leakage are based on leakage rate factors applied to leakage detected during normal operation. The multiplication factor used for Vogtle bounds the expected increased leakage in the event of an accident at Vogtle.

The projected accident induced leakage remains the same for both the single cycle and permanent H* amendments. No primary-to-secondary steam generator tube leakage has been detected during the current operating cycles at Vogtle.

For Vogtle, the number of tubes identified with flaws within the tubesheet is small in comparison to the input assumptions used in the development of the permanent H*. Consequently, significant margin exists between the current state of the Vogtle steam generators and the conservative assumptions used as the basis for the permanent H*. Structural and leakage integrity will continue to be assured for the operating period between inspections allowed by TS 5.5.9, "Steam Generator (SG) Program" with the implementation of the proposed one-time H*.

The requested changes do not expand the scope of the application as originally noticed, and does not impact the conclusions of the NRC staff's original proposed no significant hazards consideration determination as published in the Federal Register(74 FR 40240).

SNC requests approval of the proposed license amendments by September 18, 2009 to support the fall refueling outage for Vogtle Unit 1. The proposed changes would be implemented within 30 days of issuance of the amendment.

Mr. M. J. Ajluni states he is Nuclear Licensing Manager 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 as a table in Enclosure 3. If you have any questions, please advise.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

Mark J Ajluni

M. J. Ajluni
Nuclear Licensing Manager

*Sworn to and subscribed before me this* 11th *day of* September, *2009.*

Patricia H. Raymond
*Notary Public*

*My commission expires:* 7-21-12

MJA/TAH/lac

Enclosures:
1. Markup of Proposed Technical Specification
2. Typed Pages for Technical Specification
3. List of Regulatory Commitments

cc: Southern Nuclear Operating Company
Mr. J. T. Gasser, Executive Vice President
Mr. T. E. Tynan, Vice President – Vogtle
Ms. P. M. Marino, Vice President – Engineering
RType: CVC7000

U. S. Nuclear Regulatory Commission
Mr. L. A. Reyes, Regional Administrator
Ms. D. N. Wright, NRR Project Manager – Vogtle
Mr. M. Cain, Senior Resident Inspector – Vogtle

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

**Vogtle Electric Generating Plant Units 1 and 2**
**Response to Request for Additional Information Related to**
**License Amendment Request to Revise Technical Specification (TS)**
**Sections 5.5.9, "Steam Generator (SG) Program" and TS 5.6.10, "Steam Generator Tube Inspection Report" for Interim Alternate Repair Criteria**

**Enclosure 1**

**Revised Markup of Proposed Technical Specification 5.5.9 and 5.6.10**

5.5 Programs and Manuals

5.5.9 Steam Generator (SG) Program (continued)

2. Accident induced leakage performance criterion: The primary to secondary accident induced leakage rate for any design basis accident, other than a SG tube rupture, shall not exceed the leakage rate assumed in the accident analysis in terms of total leakage rate for all SGs and leakage rate for an individual SG. Leakage is not to exceed 1 gpm per SG.

3. The operational LEAKAGE performance criterion is specified in LCO 3.4.13, "RCS Operational LEAKAGE."

c. Provisions for SG tube repair criteria. Tubes found by inservice inspection to contain flaws with a depth equal to or exceeding 40% of the nominal tube wall thickness shall be plugged.

Insert 1

The following alternate tube repair criteria shall be applied as an alternative to the 40% depth based criteria:

~~1. For Unit 2 during Refueling Outage 11 and the subsequent operating cycle, degradation found in the portion of the tube below 17 inches from the top of the hot leg tubesheet does not require plugging.~~

~~For Unit 2 during Refueling Outage 11 and the subsequent operating cycle, degradation identified in the portion of the tube from the top of the hot leg tubesheet to 17 inches below the top of the tubesheet shall be plugged upon detection.~~

~~2. For Unit 1 during Refueling Outage 13 and the subsequent operating cycle, and for Unit 2 during Refueling Outage 12 and the subsequent operating cycle, degradation identified in the portion of the tube below 17 inches from the top of the hot leg tubesheet does not require plugging.~~

~~For Unit 1 during Refueling Outage 13 and the subsequent operating cycle, and for Unit 2 during Refueling Outage 12 and the subsequent operating cycle, degradation identified in the portion of the tube from the top of the hot leg tubesheet to 17 inches below the top of the hot leg tubesheet shall be plugged upon detection.~~

~~3. For Unit 1 during Refueling Outage 14 and the subsequent operating cycle and for Unit 2 during Refueling Outage 13 and the subsequent operating cycle, tubes with flaws having a circumferential component less than or equal to 203 degrees found in the portion of the tube below 17 inches from the top of the tubesheet and above 1 inch from the~~

(continued)

5.5 Programs and Manuals

5.5.9 Steam Generator (SG) Program (continued)

~~bottom of the tubesheet do not require plugging. Tubes with flaws having a circumferential component greater than 203 degrees found in the portion of the tube below 17 inches from the top of the tubesheet and above 1 inch from the bottom of the tubesheet shall be removed from service.~~

~~Tubes with service-induced flaws located within the region from the top of the tubesheet to 17 inches below the top of the tubesheet shall be removed from service. Tubes with service-induced axial cracks found in the portion of the tube below 17 inches from the top of the tubesheet do not require plugging.~~

~~When more than one flaw with circumferential components is found in the portion of the tube below 17 inches from the top of the tubesheet and above 1 inch from the bottom of the tubesheet with the total of the circumferential components greater than 203 degrees and an axial separation distance of less than 1 inch, then the tube shall be removed from service. When the circumferential components of each of the flaws are added, it is acceptable to count the overlapped portions only once in the total of circumferential components.~~

~~When one or more flaws with circumferential components are found in the portion of the tube within 1 inch from the bottom of the tubesheet, and the total of the circumferential components found in the tube exceeds 94 degrees, then the tube shall be removed from service. When one or more flaws with circumferential components are found in the portion of the tube within 1 inch from the bottom of the tubesheet, and within 1 inch axial separation distance of a flaw above 1 inch from the bottom of the tubesheet, and the total of the circumferential components found in the tube exceeds 94 degrees, then the tube shall be removed from service. When the circumferential components of each of the flaws are added, it is acceptable to count the overlapped portions only once in the total of circumferential components.~~

Insert 2

d. ~~Provisions for SG tube inspections. Periodic SG tube inspections shall be performed. The number and portions of the tubes inspected and methods of inspection shall be performed with the objective of detecting flaws of any type (e.g., volumetric flaws, axial and circumferential cracks) that may be present along the length of the tube, from the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube repair criteria. For Unit 2 during Refueling Outage 11 and the subsequent operating cycle, the portion of the tube~~

(continued)

5.5 Programs and Manuals

5.5.9 Steam Generator (SG) Program (continued)

~~below 17 inches from the top of the hot leg tubesheet is excluded. For Unit 1 during Refueling Outage 13 and the subsequent operating cycle, and for Unit 2 during Refueling Outage 12 and the subsequent operating cycle, the portion of the tube below 17 inches from the top of the hot leg tubesheet is excluded.~~ The tube-to-tubesheet weld is not part of the tube. In addition to meeting the requirements of d.1, d.2, and d.3 below, the inspection scope, inspection methods, and inspection intervals shall be such as to ensure that SG tube integrity is maintained until the next SG inspection. An assessment of degradation shall be performed to determine the type and location of flaws to which the tubes may be susceptible and, based on this assessment, to determine which inspection methods need to be employed and at what locations.

1. Inspect 100% of the tubes in each SG during the first refueling outage following SG replacement.

2. Inspect 100% of the tubes at sequential periods of 120, 90, and, thereafter, 60 effective full power months. The first sequential period shall be considered to begin after the first inservice inspection of the SGs. In addition, inspect 50% of the tubes by the refueling outage nearest the midpoint of the period and the remaining 50% by the refueling outage nearest the end of the period. No SG shall operate for more than 48 effective full power months or two refueling outages (whichever is less) without being inspected.

Insert 3

3. ~~If crack indications are found in any SG tube, then the next inspection for each SG for the degradation mechanism that caused the crack indication shall not exceed 24 effective full power months or one refueling outage (whichever is less). If definitive information, such as from examination of a pulled tube, diagnostic nondestructive testing, or engineering evaluation indicates that a crack-like indication is not associated with a crack(s), then the indication need not be treated as a crack.~~

e. Provisions for monitoring operational primary to secondary LEAKAGE.

5.5.10 Secondary Water Chemistry Program

This program provides controls for monitoring secondary water chemistry to inhibit SG tube degradation. The program shall include:

(continued)

5.6 Reporting Requirements

5.6.9 Deleted.

5.6.10 Steam Generator Tube Inspection Report

A report shall be submitted within 180 days after the initial entry into MODE 4 following completion of an inspection performed in accordance with the Specification 5.5.9, Steam Generator (SG) Program. The report shall include:

a. The scope of inspections performed on each SG,

b. Active degradation mechanisms found,

c. Nondestructive examination techniques utilized for each degradation mechanism,

d. Location, orientation (if linear), and measured sizes (if available) of service induced indications,

e. Number of tubes plugged during the inspection outage for each active degradation mechanism,

Insert 4

f. Total number and percentage of tubes plugged to date,

g. The results of condition monitoring, including the results of tube pulls and in-situ testing,

h. ~~Following completion of a Unit 1 inspection performed in Refueling Outage 14 (and any inspections performed in the subsequent operating cycle) and following completion of a Unit 2 inspection performed in Refueling Outage 13 (and any inspections performed in the subsequent operating cycle), the number of indications and location, size, orientation, whether initiated on primary or secondary side for each service-induced flaw within the thickness of the tubesheet, and the total of the circumferential components and any circumferential overlap below 17 inches from the top of the tubesheet as determined in accordance with TS 5.5.9.c.3;~~

i. ~~Following completion of a Unit 1 inspection performed in Refueling Outage 14 (and any inspections performed in the subsequent operating cycle) and following completion of a Unit 2 inspection performed in Refueling Outage 13 (and any inspections performed in the subsequent operating cycle), the primary to secondary LEAKAGE rate observed in each SG (if it is not practical to assign leakage to an individual SG, the entire primary to secondary LEAKAGE should be conservatively assumed to be from one SG) during the cycle preceding the inspection which is the subject of the report; and~~

j. ~~Following completion of a Unit 1 inspection performed in Refueling Outage 14 (and any inspections performed in the subsequent operating cycle) and following completion of a~~

(continued)

## 5.6 Reporting Requirements

5.6.10 Steam Generator Tube Inspection Report (continued)

Unit 2 inspection performed in Refueling Outage 13 (and any inspections performed in the subsequent operating cycle), the calculated accident leakage rate from the portion of the tube below 17 inches from the top of the tubesheet for the most limiting accident in the most limiting SG.

**Insert 1:**

For Unit 1 during Refueling Outage 15 and the subsequent operating cycle and for Unit 2 during Refueling Outage 14 and the subsequent operating cycle, tubes with service-induced flaws located greater than 13.1 inches below the top of the tubesheet do not require plugging. Tubes with service-induced flaws located in the portion of the tube from the top of the tubesheet to 13.1 inches below the top of the tubesheet shall be plugged upon detection.

**Insert 2:**

Provisions for SG tube inspections. Periodic SG tube inspections shall be performed. The number and portions of the tubes inspected and methods of inspection shall be performed with the objective of detecting flaws of any type (e.g., volumetric flaws, axial and circumferential cracks) that may be present along the length of the tube, from the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube repair criteria. For Unit 1 during Refueling Outage 15 and the subsequent operating cycle and for Unit 2 during Refueling Outage 14 and the subsequent operating cycle, portions of the tube below 13.1 inches below the top of the tubesheet are excluded from this requirement.

**Insert 3:**

If crack indications are found in portions of the SG tube not excluded above, then the next inspection for each SG for the degradation mechanism that caused the crack indication shall not exceed 24 effective full power months or one refueling outage (whichever is less). If definitive information, such as from examination of a pulled tube, diagnostic nondestructive testing, or engineering evaluation indicates that a crack-like indication is not associated with a crack(s), then the indication need not be treated as a crack.

**Insert 4:**

h. For Unit 1 during Refueling Outage 15 and the subsequent operating cycle and for Unit 2 during Refueling Outage 14 and the subsequent operating cycle, the primary to secondary LEAKAGE rate observed in each SG (if it is not practical to assign the LEAKAGE to an individual SG, the entire primary to secondary LEAKAGE should be conservatively assumed to be from one SG) during the cycle preceding the inspection which is the subject of the report; and

i. For Unit 1 during Refueling Outage 15 and the subsequent operating cycle and for Unit 2 during Refueling Outage 14 and the subsequent operating cycle, the calculated accident induced leakage rate from the portion of the tubes below 13.1 inches from the top of the tubesheet for the most limiting accident in the most limiting SG. In addition, if the calculated accident induced leakage rate from the most limiting accident is less than 2.48 times the maximum operational primary to secondary leakage rate, the report should describe how it was determined.

j. For Unit 1 during Refueling Outage 15 and the subsequent operating cycle and for Unit 2 during Refueling Outage 14 and the subsequent operating cycle, the results of monitoring for tube axial displacement (slippage). If slippage is discovered, the implications of the discovery and corrective action shall be provided.

**Vogtle Electric Generating Plant Units 1 and 2**
**Response to Request for Additional Information Related to**
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**Sections 5.5.9, "Steam Generator (SG) Program" and TS 5.6.10, "Steam Generator Tube Inspection Report" for Interim Alternate Repair Criteria**

**Enclosure 2**

**Typed Pages for Technical Specification 5.5.9 and 5.6.10**

5.5 Programs and Manuals

5.5.9 Steam Generator (SG) Program (continued)

2. Accident induced leakage performance criterion: The primary to secondary accident induced leakage rate for any design basis accident, other than a SG tube rupture, shall not exceed the leakage rate assumed in the accident analysis in terms of total leakage rate for all SGs and leakage rate for an individual SG. Leakage is not to exceed 1 gpm per SG.

3. The operational LEAKAGE performance criterion is specified in LCO 3.4.13, "RCS Operational LEAKAGE."

c. Provisions for SG tube repair criteria. Tubes found by inservice inspection to contain flaws with a depth equal to or exceeding 40% of the nominal tube wall thickness shall be plugged.

The following alternate tube repair criteria shall be applied as an alternative to the 40% depth based criteria:

For Unit 1 during Refueling Outage 15 and the subsequent operating cycle and for Unit 2 during Refueling Outage 14 and the subsequent operating cycle, tubes with service-induced flaws located greater than 13.1 inches below the top of the tubesheet do not require plugging. Tubes with service-induced flaws located in the portion of the tube from the top of the tubesheet to 13.1 inches below the top of the tubesheet shall be plugged upon detection.

(continued)

5.5 Programs and Manuals

5.5.9 Steam Generator (SG) Program (continued)

d. Provisions for SG tube inspections. Periodic SG tube inspections shall be performed. The number and portions of the tubes inspected and methods of inspection shall be performed with the objective of detecting flaws of any type (e.g., volumetric flaws, axial and circumferential cracks) that may be present along the length of the tube, from the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube repair criteria. For Unit 1 during Refueling Outage 15 and the subsequent operating cycle and for Unit 2 during Refueling Outage 14 and the subsequent operating cycle, portions of the tube below 13.1 inches below the top of the tubesheet are excluded from this requirement.

(continued)

5.5 Programs and Manuals

5.5.9 Steam Generator (SG) Program (continued)

The tube-to-tubesheet weld is not part of the tube. In addition to meeting the requirements of d.1, d.2, and d.3 below, the inspection scope, inspection methods, and inspection intervals shall be such as to ensure that SG tube integrity is maintained until the next SG inspection. An assessment of degradation shall be performed to determine the type and location of flaws to which the tubes may be susceptible and, based on this assessment, to determine which inspection methods need to be employed and at what locations.

1. Inspect 100% of the tubes in each SG during the first refueling outage following SG replacement.

2. Inspect 100% of the tubes at sequential periods of 120, 90, and, thereafter, 60 effective full power months. The first sequential period shall be considered to begin after the first inservice inspection of the SGs. In addition, inspect 50% of the tubes by the refueling outage nearest the midpoint of the period and the remaining 50% by the refueling outage nearest the end of the period. No SG shall operate for more than 48 effective full power months or two refueling outages (whichever is less) without being inspected.

3. If crack indications are found in portions of the SG tube not excluded above, then the next inspection for each SG for the degradation mechanism that caused the crack indication shall not exceed 24 effective full power months or one refueling outage (whichever is less). If definitive information, such as from examination of a pulled tube, diagnostic nondestructive testing, or engineering evaluation indicates that a crack-like indication is not associated with a crack(s), then the indication need not be treated as a crack.

e. Provisions for monitoring operational primary to secondary LEAKAGE.

5.5.10 Secondary Water Chemistry Program

This program provides controls for monitoring secondary water chemistry to inhibit SG tube degradation. The program shall include:

(continued)

5.6 Reporting Requirements

5.6.9 Deleted.

5.6.10 Steam Generator Tube Inspection Report

A report shall be submitted within 180 days after the initial entry into MODE 4 following completion of an inspection performed in accordance with the Specification 5.5.9, Steam Generator (SG) Program. The report shall include:

a. The scope of inspections performed on each SG,

b. Active degradation mechanisms found,

c. Nondestructive examination techniques utilized for each degradation mechanism,

d. Location, orientation (if linear), and measured sizes (if available) of service induced indications,

e. Number of tubes plugged during the inspection outage for each active degradation mechanism,

f. Total number and percentage of tubes plugged to date,

g. The results of condition monitoring, including the results of tube pulls and in-situ testing,

h. For Unit 1 during Refueling Outage 15 and the subsequent operating cycle and for Unit 2 during Refueling Outage 14 and the subsequent operating cycle, the primary to secondary LEAKAGE rate observed in each SG (if it is not practical to assign the LEAKAGE to an individual SG, the entire primary to secondary LEAKAGE should be conservatively assumed to be from one SG) during the cycle preceding the inspection which is the subject of the report; and

i. For Unit 1 during Refueling Outage 15 and the subsequent operating cycle and for Unit 2 during Refueling Outage 14 and the subsequent operating cycle, the calculated accident induced leakage rate from the portion of the tubes below 13.1 inches from the top of the tubesheet for the most limiting accident in the most limiting SG. In addition, if the calculated accident induced leakage rate from the most limiting accident is less than 2.48 times the maximum operational primary to secondary leakage rate, the report should describe how it was determined.

j. For Unit 1 during Refueling Outage 15 and the subsequent operating cycle and for Unit 2 during Refueling Outage 14 and the subsequent operating cycle, the results of monitoring for tube axial displacement (slippage). If slippage is discovered, the implications of the discovery and corrective action shall be provided.

**Vogtle Electric Generating Plant Units 1 and 2**
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**Sections 5.5.9, "Steam Generator (SG) Program" and TS 5.6.10, "Steam**
**Generator Tube Inspection Report" for Interim Alternate Repair Criteria**

**Enclosure 3**

**List of Regulatory Commitments**

## List of Regulatory Commitments

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

| Commitment | Due Date/Event |
|---|---|
| "SNC commits to revise the Steam Generator Program Strategic Plan procedure to include monitoring for tube slippage as part of the steam generator tube inspection program for Unit 1 and Unit 2. Slippage monitoring will occur for each inspection of the Vogtle 1 and 2 steam generators." | Prior to the start of Refueling Outage 1R15. |
| "SNC commits to perform a one time verification of the tube expansion to locate any significant deviations in the distance from the top of tubesheet to the bottom of the expansion transition (BET). If any significant deviations are found, the condition will be entered into the plant's corrective action program and dispositioned. Additionally, SNC commits to notify the NRC of significant deviations." | Prior to the startup following Refueling Outage 1R15 (Unit 1) and 2R14 (Unit 2). |
| "For the condition monitoring (CM) assessment, the component of operational leakage from the prior cycle from below the H* distance will be multiplied by a factor of 2.48 and added to the total accident leakage from any other source and compared to the allowable accident induced leakage limit. For the operational assessment (OA), the difference in the leakage between the allowable accident induced leakage and the accident induced leakage from sources other than the tubesheet expansion region will be divided by 2.48 and compared to the observed operational leakage. An administrative limit will be established to not exceed the calculated value." | At each scheduled inspection required by TS 5.5.9, "Steam Generator (SG) Program" beginning with 1R15 (Unit 1) and 2R14 (Unit 2). |