

Southern Nuclear
Operating Company, Inc.
One Southern Lane
Columbia, South Carolina
29204-0001
803.733.6000
www.southernnc.com



Energy to Serve Your World

October 26, 2009

Docket Nos.: 50-424
50-425

NL-09-1739

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

Vogtle Electric Generating Plant – Unit 1 & 2
Supplemental Information Regarding VEGP-ISI-RR-01, Version 1.0 (Unit 2),
Relief Request in Accordance With 10 CFR 50.55a(g)(5)(iii) and VEGP-ISI-ALT-
04, Version 2, Alternative in Accordance With 10 CFR 50.55a(a)(3)(i)

Ladies and Gentlemen:

On April 23, 2009, Southern Nuclear Company (SNC) submitted relief request VEGP-ISI-RR-01 which requests relief from performing strand testing on Vogtle Unit 2 containment tendons, applicable for the 3rd inservice inspection interval.

Per teleconference on July 24, 2009, the NRC staff acknowledged RR-L-2 submitted by SNC on April 5, 1999 and approved by the NRC on June 16, 2000 which approved SNC request to align containment tendon schedules for Unit 1 and Unit 2 for the second inspection interval. The staff requested SNC submit a similar request for the 3rd inspection interval.

On July 29, 2009, SNC received a request for additional information (RAI) letter, which contained three (3) questions.

On September 9, 2009, SNC submitted responses to July 29, 2009 RAI letter. This response contained VEGP-ISI-ALT-04, Version 1, which proposed an administrative Structural Integrity Test (SIT) date to allow SNC to align the testing schedules for IWL-2500 examinations required by IWL-2410(a) and IWL-2420(a).

Per teleconference on October 9, 2009 and confirmed by October 19, 2009 letter, NRC staff has requested SNC provide supplemental information in accordance with the LIC-109 process. The October 19, 2009 letter requested the information by October 26, 2009, however in accordance with the LIC-109 process, 13 working days from October 9, 2009 would be October 28, 2009. This was confirmed by NRC staff via telecom on October 20, 2009.

Enclosure 1 contains the SNC responses to the request for supplemental information.

Enclosure 2 contains VEGP-ISI-ALT-04, Version 2, proposed alternative in accordance with 10 CFR 50.55a(a)(3)(i). VEGP-ISI-ALT-04 requests approval to align Unit 1 and 2 Class CC testing schedules. The proposed alternative contained in VEGP-ISI-ALT-04 would apply to the 3rd inservice inspection interval and all subsequent inspection intervals for the remainder of plant operating life.

SNC requests approval by May 1, 2010 to support testing scheduled for summer 2010.

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

Sincerely,



M. J. Ajluni
Nuclear Licensing Manager

MJA/TAH/lc

Enclosures: 1. Supplemental Information
2. VEGP-ISI-ALT-04, Version 2

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

**Vogtle Electric Generating Plant – Unit 1 & 2
Supplemental Information regarding VEGP-ISI-RR-01, Version 1.0 (Unit 2),
Relief Request in Accordance With 10 CFR 50.55a(g)(5)(iii) and VEGP-ISI-
ALT-04, Version 2, Alternative in Accordance With 10 CFR 50.55a(a)(3)(i)**

Enclosure 1

Supplemental Information

Vogtle Electric Generating Plant – Unit 1 & 2
Supplemental Information regarding VEGP-ISI-RR-01, Version 1.0 (Unit 2), Relief
Request in Accordance With 10 CFR 50.55a(g)(5)(iii) and VEGP-ISI-ALT-04,
Version 2, Alternative in Accordance With 10 CFR 50.55a(a)(3)(i)
Enclosure 1

NRC staff has requested SNC provide supplemental information regarding:

1. The applicable codes for which the alternative is proposed.

SNC response:

Per VEGP-ISI-ALT-04, Version 1, SNC proposed an alternative to the IWL-2410(b) Concrete inspection schedule and IWL-2420(b) testing schedule for the Unbonded Post-Tensioning Systems. After further review, IWL-2420(b) provides the testing schedule for single unit sites. As indicated in VEGP-ISI-ALT-04, Version 2, the proposed alternative is applicable to IWL-2410(b) Concrete inspection schedule and IWL-2421(b) Unbonded Post-Tensioning Systems testing schedule for 2 unit sites.

2. Clarification of the proposed alternative testing schedule.

SNC response:

Table 1 of VEGP-ISI-ALT-04, Version 2 provides the schedule and scope of all required IWL-2500-1 examinations for Units 1 and 2 through 2030.

3. Additional technical information as to why the proposed alternative concrete inspection schedule provides an acceptable level of quality and safety.

SNC response:

Based on the language contained in IWL-2421(b) and NRC approval of Farley RR-57 and 58 provided in March 28, 2006, the testing schedule contained in VEGP-ISI-ALT-04, Version 1 indicated Vogtle would perform IWL-2500-1 Category L-A Concrete inspections on a ten year frequency. After further review of industry standards, SNC will perform the IWL-2500-1 Category L-A Concrete inspections on a five year frequency as required by IWL-2410(b).

**Vogtle Electric Generating Plant – Unit 1 & 2
Supplemental Information regarding VEGP-ISI-RR-01, Version 1.0 (Unit 2),
Relief Request in Accordance With 10 CFR 50.55a(g)(5)(iii) and VEGP-ISI-
ALT-04, Version 2, Alternative in Accordance With 10 CFR 50.55a(a)(3)(i)**

Enclosure 2

VEGP-ISI-ALT-04, Version 2

Enclosure 2
SOUTHERN NUCLEAR OPERATING COMPANY
VEGP-ISI-ALT-04, VERSION 2.0
PROPOSED ALTERNATIVE IN ACCORDANCE WITH 10 CFR 50.55a(a)(3)(i)

Plant Site-Unit:	Vogtle Electric Generating Plant -Units 1 and 2
Interval-Interval Dates:	3 rd ISI Interval, May 31, 2007 through May 30, 2017
Requested Date for Approval and Basis:	Approval is requested by May 1, 2010
ASME Code Components Affected:	The exterior portion of the VEGP-1 and 2 Containment Buildings fabricated from concrete and their post-tensioning systems (ASME Section XI, Table IWL-2500-1, Category L-A and L-B).
Applicable Code Edition and Addenda:	ASME Section XI, 2001 Edition through the 2003 Addenda
Applicable Code Requirements:	<p>IWL-2410(a) states: "Concrete shall be examined in accordance with IWL-2510 at 1, 3, and 5 years following the completion of the containment Structural Integrity Test CC-6000 and every 5 years thereafter."</p> <p>IWL-2421(b) states: "When the conditions of IWL-2421(a) are met, the inspection dates and examination requirements may be as follows.</p> <p>(1) For the containment with the first Structural Integrity Test, all examinations required by IWL-2500 shall be performed at 1, 3, and 10 years and every 10 years thereafter. Only the examinations required by IWL-2524 and IWL-2525 need be performed at 5 and 15 years and every 10 years thereafter.</p> <p>(2) For each subsequent containment constructed at the site, all examinations required by IWL-2500 shall be performed at 1, 5, and 15 years and every 10 years thereafter. Only the examinations required by IWL-2524 and IWL-2525 need be performed at 3 and 10 years and every 10 years thereafter."</p>
Reason for Request:	<p>The Unit 1 Structural Integrity Test (SIT) was completed on August 23, 1986 and the Unit 2 SIT was completed on November 14, 1988. Based on these dates, IWL-2421(b)(1) and (2) would require all IWL-2500 exams for Unit 1 in 2016 (SIT + 30-years) and Unit 2 in 2013 (SIT + 25-years). Therefore, this alternative is being proposed to allow VEGP to align the schedule for IWL-2510 and IWL-2520 examinations for both units.</p> <p>10CFR50.55a was revised in 1996 requiring containment examinations in accordance with ASME Section XI, Subsection IWE and IWL. With this rule change, the VEGP Technical Specifications were amended to reference containment examinations in accordance with IWE and IWL.</p>

Enclosure 2
SOUTHERN NUCLEAR OPERATING COMPANY
VEGP-ISI-ALT-04, VERSION 2.0
PROPOSED ALTERNATIVE IN ACCORDANCE WITH 10 CFR 50.55a(a)(3)(i)

	<p>Since IWL-2420 requires examinations based upon SIT date, SNC proposes an alternative equivalent to that of previous Technical Specification amendments which have been superseded by the ASME Section XI Code.</p>
Proposed Alternative and Basis for Use:	<p>The last complete IWL-2500 examinations were performed in 2000 for Unit 1 and 2005 for Unit 2 and only the IWL-2524 and IWL-2525 examinations were performed in 2000 for Unit 2 and 2005 for Unit 1. Therefore, SNC proposes an examination frequency equivalent to the requirements of the referenced ASME Section XI Code on a slightly altered schedule by "re-baselining" the IWL-2500 examinations in 2010 for both VEGP units. "Re-baselining" results in the examination schedule shown in the table on page 3 below.</p> <p>VEGP Unit 1 and Unit 2 containments utilize the same pre-stressing system, are essentially identical in design (except Unit 2 tendons were not designed to allow detensioning) and are similarly exposed to the same environmental conditions. The post tensioning operations for VEGP-1 were completed on April 26, 1986 and VEGP-2 on December 31, 1986. Therefore, the VEGP units meet the criteria of IWL-2421(a) allowing for examinations per IWL-2421(b).</p> <p>SNC is proposing to establish a "re-baselining" date for scheduling the 3rd ISI Interval and subsequent ISI Interval Subsection IWL examinations. This "re-baselining" date has no impact on the code required examination frequencies for either unit but will allow VEGP to schedule both unit's tendon and strand testing during the same time period. Being able to perform tendon and strand testing on both units during the same time period decreases the cost for mobilization of contractor personnel, increases the efficiency of equipment and personnel resources, allows for more standardization and application of lessons learned between units and still provides an acceptable level of quality and safety for the containment structures.</p> <p>Table 1 indicates that: 1) Subsection IWL, Table IWL-2500-1, Category L-A, Item L1.11 will be performed on a 5 year frequency, 2) Subsection IWL, Table IWL-2500-1, Category L-B Items will be performed on a 10 year frequency, and 3) Subsection IWL, Table IWL-2500-1, Category L-B, Items L2.30, L2.40 and L2.50 will be performed on a 5 year frequency as required by the code.</p> <p>Based on the tendon lift off schedule being approved by a previous Technical Specification amendment and the proposed examination frequency being equivalent to that required by the code, this alternative should be granted under 10 CFR 50.55a(a)(3)(i) because the proposed alternative continues to provide an acceptable level of quality and safety.</p>
Alternative Duration:	3 rd ISI Interval, beginning May 31, 2007 and all subsequent ISI intervals.
Precedents:	Farley Alternative RR-58 approved via NRC SER dated March 28, 2006.

Enclosure 2
SOUTHERN NUCLEAR OPERATING COMPANY
VEGP-ISI-ALT-04, VERSION 2.0
PROPOSED ALTERNATIVE IN ACCORDANCE WITH 10 CFR 50.55a(a)(3)(i)

References:	VEGP Technical Specifications SR 3.6.1.2 and 5.5.6 (prior to Amendments 147 (Unit 1) and 127 (Unit 2), dated 12/12/06) previously implemented the alternative examination schedule for lift off testing.
Status:	Awaiting NRC approval.

Enclosure 2
SOUTHERN NUCLEAR OPERATING COMPANY
VEGP-ISI-ALT-04, VERSION 2.0
PROPOSED ALTERNATIVE IN ACCORDANCE WITH 10 CFR 50.55a(a)(3)(i)

Table 1 - Proposed IWL Examination Schedule

Re-Baselining Date of 08/01/2010 for Application of Future IWL Examinations ⁽¹⁾					
Unit 1	All Table IWL-2500-1, Cat. L-A & L-B	Only Table IWL-2500-1, Cat. L-A, Item L1.11 + Cat. L-B, Item L2.30, L2.40 and L2.50	All Table IWL-2500-1, Cat. L-A & L-B	Only Table IWL-2500-1, Cat. L-A, Item L1.11 + Cat. L-B, Item L2.30, L2.40 and L2.50	All Table IWL-2500-1, Cat. L-A & L-B
	08/01/10 ⁽¹⁾	08/01/15 ⁽¹⁾	08/01/20 ⁽¹⁾	08/01/25 ⁽¹⁾	08/01/30 ⁽¹⁾
Unit 2	All Table IWL-2500-1, Cat. L-A & L-B as modified by VEGP-ISI-RR-01	Only Table IWL-2500-1, Cat. L-A, Item L1.11 + Cat. L-B, Item L2.30, L2.40 and L2.50	All Table IWL-2500-1, Cat. L-A & L-B as modified by VEGP-ISI-RR-01	Only Table IWL-2500-1, Cat. L-A, Item L1.11 + Cat. L-B, Item L2.30, L2.40 and L2.50	All Table IWL-2500-1, Cat. L-A & L-B as modified by VEGP-ISI-RR-01
	08/01/10 ⁽¹⁾	08/01/15 ⁽¹⁾	08/01/20 ⁽¹⁾	08/01/25 ⁽¹⁾	08/01/30 ⁽¹⁾

Foot notes:

(1) ± 1 year means that examinations shall commence no earlier than 1 year prior to the specified date and shall be completed no more than 1 year after specified date (as allowed by IWL-2410(c) and IWL-2420(c)).