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

Edwin I. Hatch Nuclear Plant
Joseph M. Farley Nuclear Plant
Vogtle Electric Generating Plant

Comments on Draft License Renewal Interim Staff Guidance, LR-ISG-2009-01:
Staff Guidance Regarding Plant-Specific Aging Management Review and Aging
Management Program for Neutron-Absorbing Material in Spent Fuel Pools
(Docket ID NRC-2009-0521)

Ladies and Gentlemen:

The Nuclear Regulatory Commission (NRC) requested comments on Draft License Renewal Interim Staff Guidance, LR-ISG-2009-01: Staff Guidance Regarding Plant-Specific Aging Management Review and Aging Management Program for Neutron-Absorbing Material in Spent Fuel Pools, via Federal Register notice dated December 1, 2009 (74 FR 62829). As the licensed operator for the Edwin I. Hatch Nuclear Plant; the Joseph M. Farley Nuclear Plant; and the Vogtle Electric Generating Plant, Southern Nuclear Operating Company (SNC) takes exception to the statement that, "Similarly, the spent fuel pool water chemistry program at Vogtle documented an increase in the concentration of aluminum, which indicates loss of material from the Boral neutron absorbing material (Ref. 7)."

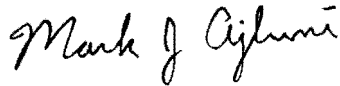
The statement from the ISG which is quoted above implies that Southern Nuclear concluded that the increase in the concentration of aluminum indicates loss of material from the BORAL™ neutron absorbing material. SNC does not believe that increasing aluminum concentration in the spent fuel pool water is conclusive evidence that loss of material from the BORAL™ neutron absorbing material is occurring. The license renewal application for Vogtle Electric Generating Plant (VEGP) (ISG Ref. 7), did state in Section B.3.28, "Aluminum concentrations in the spent fuel pool water have increased ..." However, section 3.3.2.2.6 of the VEGP license renewal application also stated, "VEGP manages loss of material due to corrosion of the aluminum cladding material with the Water Chemistry Program." The aging management reviews documented in the VEGP license renewal application did not conclude that loss of material from the BORAL™ neutron absorbing material was indicated by the increased aluminum concentration in the

spent fuel pool water, but rather that it indicated corrosion of the aluminum cladding on the BORALTM.

Therefore, it is inappropriate to use the Vogtle Electric Generating Plant operating experience with aluminum concentration in the spent fuel pool as indication of degradation of the BORALTM neutron absorbing material. SNC will perform testing of the BORALTM neutron absorbing material as committed to in the Future Action Commitment List in Appendix A of NUREG-1920, The Safety Evaluation Report Related to the Vogtle Electric Generating Plant, Units 1 and 2.

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

Sincerely,



M. J. Ajluni
Nuclear Licensing Manager

MJA/JEH/phr

cc: Southern Nuclear Operating Company
Mr. J. T. Gasser, Executive Vice President
Mr. J. R. Johnson, Vice President – Farley
Mr. D. R. Madison, Vice President – Hatch
Mr. T. E. Tynan, Vice President – Vogtle
Ms. P. M. Marino, Vice President – Engineering
RType:<Farley=CFA04.054; Hatch=CHA02.004; Vogtle=CVC7000

U. S. Nuclear Regulatory Commission
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Ms. D. N. Wright, NRR Project Manager – Vogtle
Mr. E. L. Crowe, Senior Resident Inspector – Farley
Mr. J. A. Hickey, Senior Resident Inspector – Hatch
Mr. M. Cain, Senior Resident Inspector – Vogtle