



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 5, 2010

Mr. Mark J. Ajluni
Manager, Nuclear Licensing
Southern Nuclear Operating Company, Inc.
40 Inverness Center Parkway
P.O. Box 1295
Birmingham, Alabama 35201

SUBJECT: VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2 - REQUEST FOR
ADDITIONAL INFORMATION REGARDING RELIEF REQUEST
VEGP-ISI-ALT-04 FOR THE THIRD AND SUBSEQUENT INSERVICE
INSPECTION INTERVALS (TAC NOS. ME2226 AND ME2227)

Dear Mr. Ajluni:

By letter to the U.S. Nuclear Regulatory Commission (NRC) dated September 9, 2009, as supplemented by letter dated October 26, 2009, Southern Nuclear Operating Company, Inc. (SNC), submitted relief request, VEGP-ISI-ALT-04, which proposed an alternate schedule from IWL-2410(a) and IWL-2421(b) of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, Subsection IWL, to allow the examinations required by Table IWL-2500-1 for concrete and unbonded post-tensioning systems to be aligned and performed concurrently for Vogtle Electric Generating Plant, Units 1 and 2. The NRC staff has reviewed your application and determined that additional information is needed to complete its review.

The NRC staff's request for additional information (RAI) is enclosed. The draft RAI was sent to SNC on January 21, 2010. A teleconference was held February 3, 2010, to discuss the questions. As agreed to by your staff, please provide a response by February 24, 2010. If circumstances result in the need to revise your response date, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Donna N. Wright".

Donna N. Wright, 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:
RAI

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

REGARDING RELIEF REQUEST VEGP-ISI-ALT-04

ALIGNMENT OF TESTING SCHEDULES FOR IWL-2500 EXAMINATIONS

VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2

DOCKET NOS. 50-424 AND 50-425

By letter to the U.S. Nuclear Regulatory Commission (NRC) dated September 9, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML092520157), as supplemented by letter dated October 26, 2009 (ADAMS Accession No. ML093000084), Southern Nuclear Operating Company, Inc. (SNC, the licensee), submitted relief request (RR) VEGP-ISI-ALT-04 which proposes an alternate schedule from IWL-2410(a) and IWL-2421(b) of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, Subsection IWL, to allow the examinations required by Table IWL-2500-1 for concrete and unbonded post-tensioning systems to be aligned and performed concurrently for Vogtle Electric Generating Plant, Units 1 and 2 (VEGP). The NRC staff has reviewed your application and determined that the following additional information is needed to complete its review:

1. The fourth paragraph under the "Proposed Alternative and Basis for Use" section of RR VEGP-ISI-ALT-04, Version 2, in Enclosure 2 of the letter dated October 26, 2009, states:

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.

- (a) Neither Item (1) of the RR paragraph quoted above, nor Table 1 of the RR referenced therein provides the examination schedule for Item No. L1.12, "Suspect Areas," of Examination Category L-A, Concrete, in Table IWL-2500-1. The information as provided in Table 1 of the RR would imply that Item No. L1.12 examinations (when applicable) would be performed on a 10-year interval, which is not consistent with the maximum frequency indicated in the ASME Code in Section IWL-2410. The NRC staff notes that the examination schedule in IWL-2410 covers all examinations (general visual and detailed visual) of concrete surfaces in accordance with IWL-2510. Please state explicitly and consistently (in the body of the RR and in Table 1 of the RR), the proposed minimum examination schedule for Item L1.12 (when applicable) in Table IWL-2500-1.
- (b) Items (2) and (3) as stated in the RR paragraph quoted above, are not mutually exclusive and present a contradiction with each other. Please state explicitly in the above Item (2) description, the item numbers of Examination Category L-B of Table IWL-2500-1 that would be examined on a 10-year frequency, so that it will be consistent with the information provided in Table 1 of the RR.

Enclosure

2. The first paragraph under the "Proposed Alternative and Basis for Use," section of RR VEGP-ISI-ALT-04, Version 2, in Enclosure 2 of the letter dated October 26, 2009, states, in part, that:

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.

Further, SNC's response to Supplemental Information No. 3 in Enclosure 1 states,

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-AL T-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).

The first statement above seems to indicate that VEGP has been performing the inservice examination of containment concrete surfaces, in Table IWL-2500-1, Examination Category L-A, on a 10-year frequency, rather than the 5-year examination frequency specified in IWL-2410 "Concrete." The second statement above seems to indicate that the above IWL examination frequency issue for containment concrete surfaces could also apply to the Farley Nuclear Plant. The issue seems to have risen due to a misinterpretation and/or misunderstanding of the ASME Code provision in IWL-2421(b) that is applicable only to unbonded post-tensioning systems for sites with multiple units.

- (a) Please confirm if, in the past, the licensee has been implementing the Table IWL-2500-1, Examination Category L-A examination of containment concrete surfaces on a 10-year frequency, for VEGP. If so, what action is being taken to correct the IWL examination schedule for containment concrete surfaces, such that it is in compliance with IWL-2410?
- (b) Please confirm if the above IWL examination frequency issue for containment concrete surfaces based on a 10-year frequency also applies to Farley? If so, what action is being taken to correct the IWL examination schedule for containment concrete surfaces for Farley, such that it is in compliance with IWL-2410?

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Sincerely,

/RA/

Donna N. Wright, Project Manager
 Plant Licensing Branch II-1
 Division of Operating Reactor Licensing
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Docket Nos. 50-424 and 50-425

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 RAI

cc w/encl: Distribution via Listserv

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ADAMS Accession No.: ML100360421

*provided by memo dated

OFFICE	NRR/LPL2-1/PM	NRR/LPL2-1/LA	NRR/EMCB/BC	NRR/LPL2-1/BC
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DATE	02/05/10	02/05/10	01/15/10	02/05/10

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