



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

June 16, 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 (VEGP),
REQUEST FOR ADDITIONAL INFORMATION (RAI) REGARDING GENERIC
LETTER (GL) 2008-01, "MANAGING GAS ACCUMULATION IN EMERGENCY
CORE COOLING, DECAY HEAT REMOVAL, AND CONTAINMENT SPRAY
SYSTEMS" (GL 2008-01), (TAC NOS. MD7892 AND MD7893)

Dear Mr. Ajluni:

By letters to the U.S. Nuclear Regulatory Commission (NRC) dated May 30 and October 10, 2008, January 21, 2009, and January 20, 2010 (Agencywide Documents Access and Management System, Accession Nos. ML0815402230, ML082880119, ML090220333, and ML100220234, respectively) (References 4, 5, 6 and 7 of the enclosed list), Southern Nuclear Operating Company, Inc., submitted information in response to GL 2008-01 for VEGP. On the basis of the information provided, the NRC staff has concluded that the enclosed additional information is required to determine that the licensee has acceptably demonstrated "that the subject systems are in compliance with the current licensing and design bases and applicable regulatory requirements, and that suitable design, operational, and testing control measures are in place for maintaining this compliance" as stated in GL 2008-01.

Please provide a response within forty-five (45) calendar days of the date of this letter. Please contact me at (301) 415-1493, should you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Robert Martin".

Robert E. Martin, 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

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REQUEST FOR ADDITIONAL INFORMATION

GENERIC LETTER (GL) 2008-01

VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2

DOCKET NOS. 50-424 AND 50-425

The Nuclear Regulatory Commission (NRC) staff requests additional information, as identified below, regarding the response of the Southern Nuclear Operating Company, Inc. (SNC) to Generic Letter 2008-01, "Managing Gas Accumulation In Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," (GL 2008-01), for the Vogtle Electric Generating Plant, Units 1 and 2 (VEGP). Guidance on the NRC staff's expectations is provided by Reference 1 which is generally consistent with Nuclear Energy Institute's (NEI's) guidance provided to industry in Reference 2 as clarified in later NEI communications. The NRC staff recommends that SNC consult Reference 1 when responding to the following requests for information:

1. Provide a regulatory commitment and a schedule for applying the Technical Specification Task Force (TSTF) process to any Technical Specification (TS) changes resulting from GL 2008-01.
2. References 4 through 7 did not address the potential for gas to come out of solution as it passes through the containment emergency sump screens where it may collect and then pass into the pipes leading to the pumps. Please provide a brief description of the analysis that supports resolution of this issue.
3. Please provide a summary of the current version of Procedure 50085-C, "Gas Accumulation Monitoring and Trending." Consistent with Section 3.5.2 of Reference 1, please address the following in the summary.
 - a. Where venting is accomplished, briefly describe how volumes are determined and provide estimated void volume determination uncertainty.
 - b. Describe any instructions for sampling and chemical analysis of accumulated gas.
 - c. Describe the incorporation of gas void size acceptance criteria and the requirement to initiate a Condition Report when the applicable acceptance criteria is exceeded.
 - d. Briefly describe method(s) used to identify and quantify gas voids where there is no vent.
 - e. Describe method(s) used to trend the size of the gas void.
4. Reference 7 is silent regarding the NRC staff Reference 3 criterion for pump response to gas of 1 percent. Please provide reference to a plant-specific document for updating VEGP's criteria, if needed, with respect to the NRC staff's Reference 3 criteria. If unavailable, please provide plans and schedules for completing the analysis.
5. References 5 through 7 appear to exclude all insulated piping from walkdowns. This is inconsistent with Section 3.4.6 of Reference 1. Please justify omission or provide summary

of results of walkdowns, including how the piping and components with insulation were dimensionally assessed.

6. Training was not identified in the GL, but is considered by the NRC staff to be a necessary part of applying procedures and other activities when addressing the issues identified in the GL. This was identified in the Reference 2 NEI template as an item that should be addressed in the GL. This is not addressed in your response. Please provide a brief description of planned training and its schedule.

References

1. Ruland, William H., "Preliminary Assessment of Responses to Generic Letter 2008-01, 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems,' and Future NRC Staff Review Plans," NRC letter to James H. Riley, Nuclear Energy Institute, ML091390637, May 28, 2009.
2. Riley, James H., "Generic Letter (GL) 2008-01, 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Contain Spray Systems' Evaluation and 3 Month Response Template," Letter to Administrative Points of Contact from Director, Engineering, Nuclear Generation Division, Nuclear Energy Institute, Enclosure 2, "Generic Letter 2008-01 Response Guidance," March 20, 2008.
3. Warren C. Lyon, U.S. Nuclear Regulatory Commission, "Revision 2 to NRC Staff Criteria for Gas Movement in Suction Lines and Pump Response to Gas," dated March 26, 2009 (ADAMS Accession No. ML090900136).
4. Letter from SNC, "Three-Month Response to NRC Generic Letter 2008-01, 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems,'" dated May 30, 2008, (Agencywide Document Access and Management System (ADAMS) Accession No. ML0815402230).
5. Letter from SNC, "Nine-Month Response to NRC Generic Letter 2008-01, 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems,'" dated October 10, 2008, (ADAMS Accession No. ML082880119).
6. Letter from SNC, "Unit 2 Nine-Month Supplemental Response to NRC Generic Letter 2008-01, 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems,'" dated January 21, 2009, (ADAMS Accession No. ML090220333).
7. Letter from SNC, "Unit 1 Nine-Month Supplemental Response to NRC Generic Letter 2008-01, 'Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems,'" dated January 20, 2010, (ADAMS Accession No. ML100220234).

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/RA/

Robert E. Martin, Project Manager
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*RAI transmitted by memo dated

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