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

Vogtle Electric Generating Plant Units 1 and 2
Intent to Implement Risk Informed Technical Specification Task Force Initiative
4B as the Improved Standard Technical Specification Pilot Plant

Ladies and Gentlemen:

This letter is to inform the Nuclear Regulatory Commission (NRC) of Southern Nuclear Operating Company's (SNC) intent for Vogtle Electric Generating Plant (VEGP) to become the Improved Standard Technical Specification (ISTS) pilot plant for the implementation of Risk Informed Technical Specification Task Force (RITSTF) Initiative 4B, "Risk Informed Completion Times with Configuration Risk Management Program or Maintenance Rule Backstop" In this effort, SNC will work with the Technical Specification Task Force (TSTF) and the Nuclear Energy Institute (NEI) to ensure that all efforts are in compliance with NEI 06-09, "Risk-Informed Technical Specifications Initiative 4B, Risk-Managed Technical Specifications (RMTS) Guidelines," which was approved by the NRC on May 17, 2007.

SNC recognizes that the NRC issued license amendments for South Texas Project (STP) Units 1 and 2, which approved risk-based extensions to select Technical Specification (TS) completion time action requirements. However, the STP TS are not based on the ISTS, and the STP design is somewhat unique to the domestic fleet with its three train safety system design. VEGP is an ISTS PWR, and it has a number of system designs in common with other plants, so the direct applicability of a pilot effort is increased. VEGP is a dual-unit site and a four-loop plant with low, intermediate, and high-head ECCS injection; therefore, there will be more commonality with the rest of the industry, resulting in a broader study.

SNC understands that the pilot plant should have a PRA model that is acceptable to support implementation of RITSTF Initiative 4B. In May of 2009, the VEGP PRA model Revision 4 was reviewed per RG 1.200, Revision 1 against ASME PRA Standard Requirements. The ASME PRA Standard contains a total of 327 numbered supporting requirements (SRs) in nine technical elements and the configuration control element. Eleven of the SRs represent deleted requirements (IE-A8, IE-A9, SC-A3, SY-A9, SY-B9, HR-G8, IF-A2, IF-B4, IF-D2, IF-E2, and QU-D2) and 20 were determined to be not applicable to the VEGP PRA. Among 296 applicable SRs, 99% of SRs were met Capability Category II or higher as follows:

Capability Category Met	No. of SRs	% of total applicable SRs
CC-I/II/III (or SR Met)	210	70.9%
CC I	0	0%
CC II	38	12.8%
CC III	7	2.4%
CC I/II	14	4.7%
CC II/III	24	8.1%
SR Not Met	3	1.0%
SR (CC-I/II/III) Met	296	100%

Based on these results, the VEGP Internal Events/Internal Flooding PRA model is of the highest quality.


VEGP is in the process of developing a state-of-the-art fire PRA which is planned to be peer reviewed in third quarter of 2011 against the ASME PRA Standard. It is expected that the model will meet all the supporting requirements of the Standard at capability categories that are suitable for use in applications such as RITSTF Initiative 4B.

The intent of the SNC pilot program, including NRC review, is to identify and resolve any potential generic issues in implementing RITSTF Initiative 4B, and reduce uncertainties related to NRC review and approval of plant-specific applications of this initiative for ISTS plants.

As part of the pilot program, SNC will submit a license amendment request for VEGP Units 1 and 2 requesting NRC approval to implement this risk informed TS change. SNC requests that the review fees associated with the NRC evaluation of this license amendment request be waived pursuant to 10 CFR 170.11 with the basis that the request is to assist in developing NRC regulatory guidance to endorse implementation of RITSTF Initiative 4B in accordance with 10 CFR 170.11 (a)(iii)(A). It is SNC's understanding that the fee waiver would be applicable to the complete NRC review of a VEGP license amendment request.

Please provide a decision on the request for a fee waiver as soon as practical so a license amendment request may be submitted by September 30, 2011. This letter contains no NRC commitments. If you have any questions, please contact Jack Stringfellow at (205) 992-7037.

Respectfully submitted,



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