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NL-10-2191

December 6, 2010



Docket Nos.: 50-424
50-425

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

Vogtle Electric Generating Plant Units 1 and 2
Intent to Submit a License Amendment Request to Implement
10 CFR 50.69 and Request for Pilot Plant Status

Ladies and Gentlemen:

This letter is to inform the Nuclear Regulatory Commission (NRC) of Southern Nuclear Operating Company's (SNC) intent to submit a license amendment request for implementation of 10 CFR 50.69 for the Vogtle Electric Generating Plant (VEGP). The current target date for submittal is sometime in the fourth quarter of 2011, no later than December 31, 2011.

SNC requests that the NRC assign pilot plant status to VEGP for implementation of 10 CFR 50.69 for reasons described below. SNC is committed to working with the NRC to implement 10 CFR 50.69 using NRC regulatory guidance such as RG 1.201 and NRC approved industry guidance such as NEI 00-04 "10 CFR 50.69 SSC Categorization." SNC is also committed to working with industry groups NEI, ASME, EPRI, and the PWR Owners groups in the development of industry guidance for implementation of 10 CFR 50.69. In an effort to increase the effectiveness of the NRC pilot program and to assure commonality and consistency with regard to the application of treatments of SSCs within the risk categories, SNC plans to provide examples of treatments associated with categorizations resulting from the VEGP 10 CFR 50.69 implementation. VEGP is an ISTS PWR with a number of system designs in common with other plants. VEGP is a dual-unit site and a four-loop plant with low, intermediate, and high-head ECCS injection. The design and operations commonality would facilitate direct applicability of the VEGP for the pilot plant effort.

Furthermore, SNC understands that a high quality pilot plant PRA is a key element to support pilot plant status for 10 CFR 50.69 implementation. The VEGP PRA models severe accident scenarios resulting from internal initiating events occurring at full power operation and is of sufficient quality and level of detail to support the categorization process. In May of 2009, the VEGP PRA model was reviewed per RG 1.200 Revision 1 against ASME PRA Standard Requirements. Based on the peer review results, the VEGP Internal Events/Internal Flooding PRA model is of the highest quality with 99% of 296

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applicable supporting requirements (SRs) met at Capability Category II or higher. Since the peer review, all outstanding issues have been resolved.

Ongoing NRC generic regulation improvements will benefit by the application of risk informed regulation like 10 CFR 50.69. New methods and treatment developed as part of this effort may be the basic platform on which future risk informed regulation could be built. SNC believes that the NRC will use such information to improve regulations. Pursuant to 10 CFR 170.11(a)(1)(iii)(A), SNC requests that the review fees associated with the NRC evaluation of this license amendment request be waived. It is SNC's understanding that the fee waiver would be applicable to the complete NRC review of a VEGP license amendment request.

In order to facilitate efficient implementation of 10 CFR 50.69, SNC requests that the NRC assign a NRC point of contact to work with the SNC Project Manager on this project.

SNC respectfully requests a decision on the request for pilot plant status and fee waiver as soon as practicable in order to support timely and efficient preparation of the license amendment request.

This letter contains no NRC commitments.

If you have any questions, please contact Jack Stringfellow at (205) 992-7037.

Respectfully submitted,



M. J. Ajluni
Nuclear Licensing Director

MJA/GAL/emm

cc: Southern Nuclear Operating Company
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Mr. T. E. Tynan, Vice President – Vogtle
Ms. P. M. Marino, Vice President – Engineering
RType: CVC7000

U. S. Nuclear Regulatory Commission
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Mr. R. E. Martin, NRR Project Manager – Vogtle
Mr. M. Cain, Senior Resident Inspector – Vogtle
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