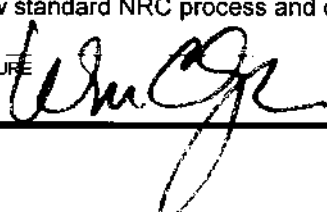


<p>NRC FORM 699 (9-2003)</p> <p style="text-align: center;">U.S. NUCLEAR REGULATORY COMMISSION</p> <p style="text-align: center;">CONVERSATION RECORD</p>		<p>DATE 10/27/2011</p> <p>TIME</p>
<p>NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU Mark Ajluni</p> <p>ORGANIZATION Southern Nuclear Operating Company</p> <p>SUBJECT Teleconference to Discuss SNOC request for relief from ASME Code Requirements to Implement Temporary non-Code Repair of Service Water Piping on E.I. Hatch Unit 1 ME7366</p>	<p>TELEPHONE NO.</p>	<p>TYPE OF CONVERSATION</p> <p><input type="checkbox"/> VISIT</p> <p><input type="checkbox"/> CONFERENCE</p> <p><input checked="" type="checkbox"/> TELEPHONE</p> <p><input type="checkbox"/> INCOMING</p> <p><input checked="" type="checkbox"/> OUTGOING</p>
<p>SUMMARY (Continue on Page 2)</p> <p>Attendees: NRC: W.Gleaves, G.Kulesa, T.Lupold, D.Alley, E.Morris, G.Croon RGN2 SNOC: M.Ajluni, R.Racheford, D.Madison, S.Bailey, J.Edward, M.Torrence, and plant manager.</p> <p>Prior to the teleconference to discuss the subject, SNOC stated that, as a result of the augmented inspections required as part of the subject relief request, additional leaks on the Hatch Unit 1 service water pipe were found. A total of 5 additional areas were required to be inspected by the Code Case N-513, R3, and if leaks are found it is required that the augmented inspection be expanded. Not all of the original 5 areas have yet been inspected and the inspection scope has not yet been expanded. The leak was found in the SW piping for Unit 1 in a concrete valve pit and the leak was characterized as "weeping". Plant Hatch is evaluating the leak. This weeping leak is said to be hundreds of feet away from the leaks that are the subject of the relief request. The NRC (Dave Alley) stated, "Code Case N-513-3 says when flaws are detected, an additional sample shall be inspected until no more leaks are located." Rebecca Racheford of SNOC program group agreed with that assessment.</p> <p>Then the NRC proceeded with the call as planned. The purpose was to give oral approval of the Plant Hatch relief request in order to perform a non-Code repair of service water piping on Unit 1. The NRC's statement went as follows:</p> <p>Statement by Tim Lupold, Branch Chief, Division of Engineering, Piping and NDE Branch - By letter dated October 24, 2011, as supplemented by letter dated October 27, 2011, Southern Nuclear Operating Company (the licensee) requested authorization to implement alternative HNP-ISI-ALT-14, Version 2, which proposes a temporary non-code repair to leaks discovered in the Hatch Nuclear Plant Unit 1 (HNP-1) Plant Service Water (PSW) System. Specifically, the licensee requested relief from the requirements of paragraphs IWA-4412 and IWA-4420 of Section XI of the 2001 Edition of the ASME Boiler and Pressure Vessel Code. These paragraphs require that repair/replacement of piping be made in accordance with the ASME Code and that, in order to perform code compliant repairs, the defect must be removed.</p> <p style="text-align: right;">Continue on Page 2</p>		
<p>ACTION REQUIRED No immediate action.</p> <p>Documentation of this conference call by W. Gleaves, Project Manager within 2 days.</p> <p>The submitted relief request safety evaluation will follow standard NRC process and our goal for issuance of the SE is 150 days from submittal.</p>		
<p>NAME OF PERSON DOCUMENTING CONVERSATION William (Billy) Gleaves</p>	<p>SIGNATURE </p>	<p>DATE 10/31/2011</p>
<p>ACTION TAKEN</p>		
<p>TITLE OF PERSON TAKING ACTION</p>	<p>SIGNATURE OF PERSON TAKING ACTION</p>	<p>DATE</p>

CONVERSATION RECORD (Continued)**SUMMARY (Continue on Page 3)**

The licensee has requested relief from the requirements under 10 CFR 50.55a(a)(3)(ii), stating that the completion of a code compliant repair (i.e. removal of the defect) would constitute undue hardship without a compensating increase in the level of quality and safety. Furthermore, the licensee has requested verbal authorization to make this non-code repair based on the need to make the repair in a timely manner.

The basis presented by the licensee in support of this request is as follows:

1. At the present time the pipe under consideration is weeping from two locations as a result of corrosion occurring from the inside of the pipe. Given the present leak rate, it is technically possible to make a non-code compliant repair to the piping to provide both structural and leak tight integrity while the piping remains in service. This repair can be made by welding reinforcing plates over the degraded locations without removing the defect.
2. To make a code compliant repair, it would be necessary to remove the defect. If this were attempted with the pipe in service, the leak rate would be far too great to successfully weld reinforcing plates over the flaws. Removal of the PSW subsystem from operation to perform the repair requires entry into a technical specification action statement. The action time for restoration of PSW subsystem to operable status is 72 hours. It is not possible to complete the code compliant repair in this time period.
3. The urgency for making this repair is due to the temperature of the water (i.e. river temperature) in the pipe. The river temperature is currently 66oF and falling. Welding the reinforcing plate to the pipe while the pipe remains in service requires a preheat temperature of 60oF. If the river temperature falls below 60oF, which is expected in a matter of days, this repair will become substantially more difficult.

The staff has evaluated the licensee's request to verify the existence of a hardship and to determine the acceptability of the proposed alternative. Based on items 1 – 3 above, the staff finds that the performance of a code repair constitutes a hardship as it will require a plant shutdown. Based on a comparison of the licensee's proposed alternative with guidance contained in ASME Code Case N-513-3 and Generic Letter 90-05, the staff finds that the licensee's proposed alternative is acceptable from both structural and leak tight integrity perspectives. The staff, therefore, concludes that performance of a code repair would constitute undue hardship without a compensating increase in the level of quality and safety.

Statement by Gloria Kulesa, Division of Operating Reactor Licensing, Chief of Plant Licensing Branch II-1 - Based on the review of the information provided in the October 24 and 27, 2011 submittals, the NRC staff concludes that compliance with the specified requirements would result in a hardship or unusual difficulty without a compensating increase in the level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(ii), the NRC verbally authorizes repair to the plant service water system in accordance with alternative HNP-ISI-ALT-14, Version 2 for a period of time not to exceed the plant's next refueling outage, currently scheduled for February 2012.

All other ASME Code, Section XI requirements for which relief was not specifically requested and approved in this relief request remain applicable, including third party review by the Authorized Nuclear Inservice Inspector.

Statement by Tim Lupold - We want to caution against a "patchwork" approach to fixing degradation. We would encourage SNOG to consider a "holistic" approach that considers the health of the entire pipe. NRC would evaluate this approach especially in light of a potential "blanket" request for relief from Code requirements to implement additional temporary non-Code repairs.