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

September 8, 2015

Mr. C. R. Pierce
Regulatory Affairs Director
Southern Nuclear Operating Company, Inc.
Post Office Box 1295, Bin - 038
Birmingham, AL 35201-1295

SUBJECT: EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2 (HNP) – REQUEST FOR ADDITIONAL INFORMATION ON ALTERNATIVE V-9 (TAC NOS. MF6238 AND MF6239)

Dear Mr. Pierce:

By letter dated May 4, 2015, Southern Nuclear Operating Company, Inc. requested Nuclear Regulatory Commission (NRC) authorization of alternative V-9 for the HNP for the fifth Ten-Year Interval Inservice Testing Program. In order to continue the review, the NRC staff requests additional information as discussed in the Enclosure. It is requested that your response be provided within thirty (30) days of the date of this letter.

Sincerely,

/RMartin

Bob Martin, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-321 and 50-366

Enclosure:
Request for Additional Information

cc: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

REGARDING PROPOSED ALTERNATIVE V-9

FOR THE INSERVICE TESTING PROGRAM FIFTH 10-YEAR INTERVAL

EDWIN I. HATCH PLANT UNITS 1 & 2 (HNP)

By letter dated May 4, 2015, Agencywide Documents Access and Management System (ADAMS) Accession No. ML15124A904, the Southern Nuclear Operating Company, Inc. (the licensee) requested authorization, pursuant to Title 10 of the Code of *Federal Regulations* (10 CFR), Section 50.55a(z)(2), for alternative testing associated with the inservice testing (IST) program fifth 10-year interval for the HNP. The Nuclear Regulatory Commission (NRC) staff is reviewing the submittal and has the following question:

10 CFR Section 50.55a(f)(4), "Inservice testing standards requirement for operating plants," requires, in part, that IST of certain American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components must meet the requirements of the ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code). 10 CFR 50.55a(z) provides that alternatives to the requirements of paragraph (f) of 10 CFR 50.55a may be used when authorized by NRC.

In proposing alternatives, a licensee must demonstrate that the proposed alternatives provide an acceptable level of quality and safety (10 CFR 50.55a(z)(1)) or compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety (10 CFR 50.55a(z)(2)).

Proposed alternative V-9 requests an alternative for testing excess flow check valves (EFCV). The alternative is to test EFCVs at a frequency specified in Technical Specifications (TS) Surveillance Requirement (SR) 3.6.1.3.8. TS SR 3.6.1.3.8 allows a "representative sample" of EFCVs to be tested every refueling outage, such that each EFCV will be individually tested approximately every 10 years. Justification for the relief request is based on General Electric (GE) Topical Report NEDO-32977-A "Excess Flow Check Valve Testing Relaxation" dated June 2000. The topical report provided: (1) an estimate of steam release frequency (into the reactor building) due to a break in an instrument line concurrent with an EFCV failure to close, (2) and assessment of the radiological consequences of such a release. The NRC staff reviewed the GE topical report and issued its evaluation on March 14, 2000 (ADAMS Accession No. ML003691722). In its evaluation, the NRC staff found that the test interval could be extended up to a maximum of 10 years. In conjunction with this finding, the NRC staff noted that each licensee that adopts the relaxed test interval program for EFCVs must have a failure feedback mechanism and corrective action program (CAP) to ensure EFCV performance continues to be bounded by the topical report results.

Enclosure

Please explain HNP failure feedback mechanism and CAP. Also, please explain how the CAP will evaluate component failures and establish appropriate corrective actions.

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Sincerely,

/RA/

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Plant Licensing Branch II-1
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