



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

October 14, 2016

Mr. Charles R. Pierce
Regulatory Affairs Director
Southern Nuclear Operating Company, Inc.
P.O. Box 1295 / Bin 038
Birmingham, AL 35201-1295

SUBJECT: FARLEY NUCLEAR PLANT, UNITS 1 AND 2, AND VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2 – ALTERNATIVES FOR PUMPS AND VALVES INSERVICE TESTING PROGRAM (CAC NOS. MF8210, MF8211, MF8212, MF8213, MF8182, AND MF8183)

Dear Mr. Pierce:

By letter dated July 28, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16214A252), Southern Nuclear Operating Company Inc. (SNC or the licensee) proposed an alternative to the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) by adopting approved Code Case OMN-20 "Inservice Test [IST] Frequency" for use at the Joseph M. Farley Nuclear Plant, Units 1 and 2 (FNP), during its fourth 10-year IST interval and for use at the Vogtle Electric Generating Plant, Units 1 and 2 (VEGP), during its third 10-year IST Interval. Also, by another letter dated July 28, 2016 (ADAMS Accession No. ML16210A460), SNC proposed a similar alternative for the VEGP during its fourth 10-year IST interval.

The U.S. Nuclear Regulatory Commission (NRC) staff has determined that the proposed alternatives provide reasonable assurance that the affected components are operationally ready. The NRC staff concludes that the licensee has adequately addressed all of the regulatory requirements set forth in Title 10 of the *Code of Federal Regulation* Section 50.55a(z)(2).

Accordingly, the NRC staff authorizes the adoption of Code Case OMN-20 for (1) the remainder of the fourth 10-year IST interval at FNP, which is currently scheduled to end November 30, 2017; (2) the remainder of the third 10-year IST interval at VEGP, which is currently scheduled to end May 31, 2017; and (3) the VEGP fourth 10-year interval, which is currently scheduled to

C.R. Pierce

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start June 1, 2017. All other ASME OM Code requirements for which relief was not specifically requested and approved in the subject requests for relief remain applicable.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael T. Markley". The signature is fluid and cursive, with the first name being the most prominent.

Michael T. Markley, Chief
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-348, 50-364, 50-424,
and 50-425

Enclosure:
Safety Evaluation

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UNITED STATES
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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

PROPOSED ALTERNATIVES FOR THE INSERVICE TESTING PROGRAM

SOUTHERN NUCLEAR OPERATING COMPANY, INC.

JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2

VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2

1.0 INTRODUCTION

By letter dated July 28, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16214A252), Southern Nuclear Operating Company Inc. (SNC or the licensee) proposed an alternative to the 2001 Edition through 2003 Addenda of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) by adopting approved Code Case OMN-20 "Inservice Test [IST] Frequency" for use at for the Joseph M. Farley Nuclear Plant, Units 1 and 2 (FNP), during its fourth 10-year IST interval, which is scheduled to end November 30, 2017. A similar alternative to the 2001 Edition through 2003 Addenda of the ASME OM Code was proposed for the Vogtle Electric Generating Plant, Units 1 and 2 (VEGP), during its third 10-year IST interval, which is scheduled to end May 31, 2017.

By another letter dated July, 28, 2016 (ADAMS Accession No. ML16210A460), SNC proposed a similar alternative to the 2004 Edition through 2006 Addenda of the ASME OM Code by adopting approved Code Case OMN-20 "Inservice Test Frequency" for use at the VEGP during its fourth 10-year IST interval, which is currently scheduled to start June 1, 2017.

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a(z)(2), the licensee requested to use proposed alternatives, since complying with the current ASME OM Code requirements would result in hardship or unusual difficulty, without a compensating increase in the level of quality and safety.

2.0 REGULATORY EVALUATION

The regulation in 10 CFR 50.55a(f), "Inservice Testing Requirements," requires, in part, that IST of certain ASME Code Class 1, 2, and 3 components must meet the requirements of the ASME OM Code and applicable addenda, except where alternatives have been authorized pursuant to paragraphs 10 CFR 50.55a(z)(1) or 10 CFR 50.55a(z)(2).

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)).

Enclosure

Based on the above, and subject to the following technical evaluation, the U.S. Nuclear Regulatory Commission (NRC or the Commission) staff finds that regulatory authority exists for the licensee to request, and the Commission to authorize, the alternative requested by the licensee.

3.0 TECHNICAL EVALUATION

3.1. Licensee's Alternative Requests

ASME OM Code Requirements:

This request relates to the test frequency requirements for pumps and valves applicable to ASME OM Division 1, Section IST, 2009 Edition through Oma-2011 Addenda and all earlier editions and addenda of the ASME OM Code. This request is also applicable to any adopted ASME OM Code Cases listed in Regulatory Guide 1.192, Revision 1, "Operation and Maintenance Code Case Acceptability, ASME OM Code" (ADAMS Accession No. ML13340A034), which pertain to pumps and valves.

The licensee states, in part:

Reason for Request

The IST Program controls specified in Section 5.5 of TS [Technical Specification] provide: a) a table specifying certain IST frequencies; b) an allowance to apply SR [Surveillance Requirement] 3.0.2 to inservice tests required by the OM Code and with frequencies of two years or less; c) an allowance to apply SR 3.0.3 to inservice tests required by the OM Code; and d) a statement that, "Nothing in the ASME OM Code shall be construed to supersede the requirements of any TS." In Regulatory Issue Summary (RIS) 2012-10, "NRC Staff Position on Applying Surveillance Requirement 3.0.2 and 3.0.3 to Administrative Controls Program Tests," and Enforcement Guidance Memorandum (EGM) 2012-001, "Dispositioning Noncompliance with Administrative Controls Technical Specifications Programmatic Requirements that Extend Test Frequencies and Allow Performance of Missed Tests," the NRC stated that items b, c, and d of the TS IST Program were inappropriately added to the TS and may not be applied (although the EGM allows licensees to continue to apply those paragraphs pending a generic resolution of the issue).

In RIS 2012-10 and EGM 2012-001, the NRC stated that the current TS allowance to apply SR 3.0.2 and SR 3.0.3 to the Inservice Testing Program would no longer be permitted. In response, OMN-20, which provides allowances similar to SR 3.0.2, was approved and is proposed to be used as an alternative to the test periods specified in the OM code.

Proposed Alternative and Basis for Use

The proposed alternative is OMN-20, "Inservice Test Frequency," which addresses testing periods for pumps and valves specified in ASME OM Division 1,

Section IST, 2009 Edition through OMa-2011 Addenda, and all earlier editions and addenda of ASME OM Code.

This request is being made in accordance with 10 CFR 50.55a(z)(2), in that the existing requirements are considered a hardship without a compensating increase in quality and safety for the following reasons:

- 1) For IST testing periods up to and including 2 years, Code Case OMN-20 provides an allowance to extend the IST testing periods by up to 25%. The period extension is to facilitate test scheduling and considers plant operating conditions that may not be suitable for performance of the required testing (e.g., performance of the test would cause an unacceptable increase in the plant risk profile due to transient conditions or other ongoing surveillance, test or maintenance activities). Period extensions are not intended to be used repeatedly merely as an operational convenience to extend test intervals beyond those specified. The test period extension and the statements regarding the appropriate use of the period extension are equivalent to the existing TS SR 3.0.2 allowance and the statements regarding its use in the SR 3.0.2 Bases. Use of the SR 3.0.2 period extension has been a practice in the nuclear industry for many decades and elimination of this allowance would place a hardship on SNC when there is no evidence that the period extensions affect component reliability.
- 2) For IST testing periods of greater than 2 years, OMN-20 allows an extension of up to 6 months. The ASME OM Committee determined that such an extension is appropriate. The 6-month extension will have a minimal impact on component reliability considering that the most probable result of performing any inservice test is satisfactory verification of the test acceptance criteria. As such, pumps and valves will continue to be adequately assessed for operational readiness when tested in accordance with the requirements specified in 10 CFR 50.55a(f) with the frequency extensions allowed by Code Case OMN-20.
- 3) As stated in EGM 2012-001, if an Inservice Test is not performed within its frequency, SR 3.0.3 will not be applied. The effect of a missed Inservice Test on the Operability of TS equipment will be assessed under the licensee's Operability Determination Program.

The proposed alternative is requested for the current 10-year FNP and VEGP IST intervals, or until Code Case OMN-20 is incorporated into a future revision of Regulatory Guide 1.192 referenced by a future revision of 10 CFR 50.55a, whichever occurs first. Currently, FNP is in its fourth interval and VEGP is in its third interval. Note that since VEGP's fourth interval begins June 1, 2017, a separate SNC letter (NL-16-1292) contains a similar alternative for the VEGP fourth interval.

3.2 NRC Staff Evaluation

Historically, licensees have applied, and the NRC staff has accepted, the Standard Technical Specification definitions for IST intervals (including allowable interval extensions) to ASME OM

Code-required testing (see Section 3.1.3 of NUREG-1482, Revision 2, "Guidelines for Inservice Testing at Nuclear Power Plants, Inservice Testing of Pumps and Valves and Inservice Examination and Testing of Dynamic Restraints (Snubbers) at Nuclear Power Plants, Final Report" October 2013 (ADAMS Accession No. ML13295A020). Recently, the NRC staff reconsidered the allowance of using TS testing intervals and interval extensions for IST not associated with TS SRs. As noted in RIS 2012-10, "NRC Staff Position on Applying Surveillance Requirements 3.0.2 and 3.0.3 to Administrative Controls Program Tests," dated August 23, 2012 (ADAMS Accession No. ML12079A393), the NRC determined that programmatic test frequencies cannot be extended in accordance with TS SR 3.0.2. This includes all IST described in the ASME OM Code not specifically required by the TS SRs.

Following this development, the NRC staff sponsored and co-authored an ASME OM Code inquiry and Code Case to modify the ASME OM Code to include TS-like test interval definitions and interval extension criteria. The resultant Code Case OMN-20 was approved by the ASME Operation and Maintenance Standards Committee on February 15, 2012, with the NRC representative voting in the affirmative. Code Case OMN-20 was subsequently published in conjunction with the ASME OM Code, 2012 Edition. The licensee proposes to adopt Code Case OMN-20.

Requiring the licensee to meet the ASME OM Code requirements and applicable adopted ASME OM Code Cases without an allowance for defined frequency and frequency extensions for IST of pumps and valves results in a hardship, without a compensating increase in the level of quality and safety. Based on the prior acceptance by the NRC staff of the similar TS test interval definitions and interval extension criteria, the staff concludes that implementation of the test interval definitions and interval extension criteria contained in ASME OM Code Case OMN-20 is acceptable. Allowing the use of Code Case OMN-20 provides reasonable assurance of operational readiness of pumps and valves subject to the ASME OM Code IST.

4.0 CONCLUSION

As set forth above, the NRC staff has determined that the proposed alternatives provide reasonable assurance that the affected components are operationally ready. The NRC staff concludes that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(z)(2).

Accordingly, the NRC staff authorizes the adoption of Code Case OMN-20 for (1) the remainder of the fourth 10-year IST interval at FNP, which is currently scheduled to end November 30, 2017; (2) the remainder of the third 10-year IST interval at VEGP, which is currently scheduled to end May 31, 2017; and (3) the VEGP fourth 10-year interval, which is currently scheduled to start June 1, 2017. All other ASME OM Code requirements for which relief was not specifically requested and approved in the subject requests for relief remain applicable.

Principal Contributor: M. Farnan

Date: October 14, 2016

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Sincerely,

/RA SWilliams for/

Michael T. Markley, Chief
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-348, 50-364, 50-424,
and 50-425

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ADAMS Accession No.: ML16264A321

OFFICE	NRR/DORL/LPL2-1/PM	NRR/DORL/LPL2-1/LA	NRR/DE/EPNB/BC	NRR/DORL/LPL2-1/BC
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DATE	9/23/2016	9/21/2016	9/13/2016	10/14/2016

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