

**From:** [Hall, Randy](#)  
**To:** [Ken McElroy](#); [Joyce, Ryan M. \(RMJOYCE@southernco.com\)](#)  
**Subject:** Hatch Unit 2 - Draft Request for Additional Information on Alternative RR-V-11, Proposed Extension to Main Steam Safety Relief Valve Testing Requirements (EPID L-2017-LLR-0075)  
**Date:** Thursday, March 08, 2018 3:41:00 PM  
**Attachments:** [Draft RAIs to SNC 8 March 2018.docx](#)

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March 8, 2018

Mr. G. Ken McElroy  
Licensing Manager  
Southern Nuclear Operating Company, Inc.

Dear Ken,

By letter dated August 3, 2017 (Agencywide Documents Access and Management System Accession No. ML17215A558), the Southern Nuclear Operating Company, Inc. (SNC) submitted a request for alternative for the Edwin I. Hatch Nuclear Plant, Unit 2. The requested alternative would authorize a one-time extension of the main steam safety relief valve (SRV) main body test frequency, allowing the required testing to be performed at the next Unit 2 refueling outage in February 2019. The NRC staff has reviewed the information provided by SNC in your submittal regarding proposed alternative RR-V-11, and has determined that the additional information in the attached draft Request for Additional Information (RAI) is needed to complete its evaluation.

We have scheduled a clarification call with your staff at 10 AM EDT on March 14, 2018, to discuss the draft RAI and the operating experience gained by SNC from the SRV testing and examinations completed during the recent Unit 1 refueling outage. The call is intended to ensure that the draft RAI questions are understandable, the regulatory basis for the questions is clear, and to determine whether any of the information requested was previously docketed.

Following the clarification call, the staff's RAI will be documented as an Official Agency Record. SNC is requested to provide a written response to the RAI within 30 days of the date of the clarification call, unless a different schedule is agreed to during the call.

Please contact me if you have any questions.

Randy

**Randy Hall, Senior Project Manager**  
**Plant Licensing Branch II-1**  
**Division of Operating Reactor Licensing**  
**Office of Nuclear Reactor Regulation**  
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REQUEST FOR ADDITIONAL INFORMATION  
OFFICE OF NUCLEAR REACTOR REGULATION  
REQUEST FOR ALTERNATIVE RR-V-11  
REGARDING MAIN STEAM SAFETY RELIEF VALVE TESTING REQUIREMENTS  
EDWIN I. HATCH NUCLEAR PLANT, UNIT 2  
SOUTHERN NUCLEAR OPERATING COMPANY, INC.  
DOCKET NO. 50-366

By letter dated August 3, 2017 (Agencywide Documents Access and Management System Accession No. ML17215A558), the Southern Nuclear Operating Company, Inc. (SNC) submitted a request for alternative for the Edwin I. Hatch Nuclear Plant, Unit 2 (Hatch Unit 2). The requested alternative would authorize a one-time extension of the main steam safety relief valve (SRV) main body test frequency, allowing the required testing to be performed at the next Hatch Unit 2 refueling outage in February 2019. The NRC staff has reviewed the information provided by SNC in its submittal regarding proposed alternative RR-V-11, and has determined that the additional information below is needed to complete its evaluation.

The proposed alternative to the ASME OM Code requirements for testing of the Hatch Unit 2 SRVs was requested pursuant to 10 CFR 50.55a(z)(2) on the basis that the Code requirements result in a hardship or unusual difficulty without a compensating increase in the level of quality and safety. However, the valves in question have been the subject of 10 CFR Part 21 notifications and the valves currently in service have been subjected to the vendor recommended Part 21 interim actions, for which there is little operating experience. The staff requires additional information to support SNC's conclusion that compliance with the Code requirements does not provide a compensating increase in quality and safety in this instance.

1. Discuss the as-found condition of the SRVs currently in service in Hatch Unit 2 following limited flow testing and prior to performing the Part 21 recommended actions before returning them to service.
2. Discuss the operating, test, and examination history of the subject valve for both Hatch Unit 2 and Hatch Unit 1.
3. Have the valves been actuated in-service during the current Hatch Unit 2 or previous Hatch Unit 1 fuel cycles? If so, what were the results?
4. What information is available from the inspection and testing of the Hatch Unit 1 SRVs during the just completed February 2018 refueling outage? Discuss how these results will be applied to the ongoing evaluation of the condition of the Unit 2 valves, and what impact those results may have on the justification for extending the current test interval.