

## Vogle PEmails

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**From:** Hoellman, Jordan  
**Sent:** Thursday, July 12, 2018 3:32 PM  
**To:** Vogle PEmails  
**Subject:** Draft Request for Alternative (ALT-10) for Pre-submittal Meeting  
**Attachments:** ND-17-1859 Enclosure ALT-10 Presubmittal.pdf

Please see the attached draft Request for Alternative (ALT-10) for discussion at the 7/19/18 public meeting. The draft ALT-10 does not contain SUNSI.

**Hearing Identifier:** Vogtle\_COL\_Docs\_Public  
**Email Number:** 321

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**Subject:** Draft Request for Alternative (ALT-10) for Pre-submittal Meeting  
**Sent Date:** 7/12/2018 3:32:25 PM  
**Received Date:** 7/12/2018 3:32:28 PM  
**From:** Hoellman, Jordan

**Created By:** Jordan.Hoellman2@nrc.gov

**Recipients:**  
"Vogtle PEmails" <Vogtle.PEmails@nrc.gov>  
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ND-17-1859

Enclosure

Proposed Alternative VEGP 3&4-PSI/ISI-ALT-10 in Accordance with 10 CFR 50.55a(z)(1) – Alternative Requirements for Preservice Examination Volumetric Surface Configuration Requirements

<b>Plant Site-Unit:</b>	Vogtle Electric Generating Plant (VEGP) – Units 3 and 4
<b>Interval-Interval Dates:</b>	Applies to construction and preservice inspection intervals.
<b>Requested Date for Approval:</b>	Approval is requested by 1/13/19 to support performance of preservice inspection activities prior to the Class 1 hydrostatic test.
<b>ASME Code Components Affected:</b>	ASME Class 1 Piping and Components
<b>Applicable Code Edition and Addenda:</b>	ASME B&PV Code, Section III, 1998 Edition through the 2000 Addenda (code of record).
<b>Applicable Code Requirements:</b>	<p>ASME Section III NB-4424.2 (a) requires that the surface finish shall be 6.3 Ra or better for a distance of at least 2t (where t equals nominal wall thickness) plus 4 in. or 6 in., whichever is greater (Fig. NB-4250-2 or Fig. NB-4250-3), from the edge of the weld crown on at least one side of the weld where an ultrasonic examination is required.</p> <p>As noted in Fig. NB-4250-2 and NB-4250-3, this distance is required to be free of interferences.</p>
<b>Reason for Request:</b>	The requirements for surface finish, surface finish distance, and distance for which any hanger or attachment (or any other interference) can be made, is required to be 2t (where t equals nominal wall thickness) plus 4 inches, or 6 inches, whichever is greater as described in ASME Section III NB-4424.2(a) and shown in ASME Section III NB-4250-2 for ultrasonic examinations.

	<p>The purpose of this distance requirement is to assure the examination area is adequate to perform a volumetric examination from the outside diameter (OD) for component-to-pipe and pipe-to-pipe welds.</p> <p>Other examination configurations exist that would allow an adequate examination in accordance with ASME Section XI. One specific example is instrumentation bosses near the AP1000 Steam Generator Hot Leg Safe End-to-Pipe welds are within the distance required in ASME Section III NB-4424.2 (Shown in Figure NB-4250-2).</p>
<p><b>Proposed Alternative and Basis for Use:</b></p>	<p><b>Proposed Alternative:</b></p> <p>For configurations that do not meet those described in NB-4424.2(a) and shown in Figure NB-4250-2 and Figure NB-4250-3:</p> <p>(a) The requirements of Figure NB-4250-1 shall be met.                  (b) The Owner’s Design Specification shall describe the configuration and surface finish required for preservice inspection in lieu of the configuration shown in Figure NB-4250-2 or Figure NB-4250-3 and surface finish described in NB-4424.2(a).                  (c) The Certificate Holder (with agreement of the Owner or Owner Designee) shall verify and document that the required preservice inspection can be performed with the proposed configuration and surface finish.                  (d) Use of this alternative shall be documented in the appropriate Data Report Form.</p> <p><b>Basis for Use:</b></p> <p>For volumetric examination surface configurations that do not meet NB-4424.2(a), which reference Fig. NB-4250-2 and NB-4250-3, an inspectability evaluation is performed and documented to ensure that essentially 100% of the ASME Section XI volumetric examination coverage is obtained. If essentially 100% volumetric examination coverage is not obtained, this alternative shall not apply.</p> <p>The proposed alternative ensures that essentially 100% of the ASME Section XI preservice inspection volume is obtained and future inservice inspection coverage requirements will be met; therefore, this proposed alternative provides an acceptable level of quality and safety in accordance with 10 CFR 50.55a(z)(1).</p>
<p><b>Duration of Proposed Alternative:</b></p>	<p>This alternative applies to the period preceding plant operations.</p>

ND-17-1859

Enclosure

Proposed Alternative VEGP 3&4-PSI/ISI-ALT-10 in Accordance with 10 CFR 50.55a(z)(1) –  
Alternative Requirements for Preservice Examination Volumetric Surface Configuration  
Requirements

<b>References:</b>	None
<b>Status:</b>	Awaiting NRC authorization

DRAFT