



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

March 8, 1996

Mr. C. K. McCoy Vice President - Nuclear Vogtle Project Georgia Power Company P. O. Box 1295 Birmingham, AL 35201

SUBJECT: VOGTLE ELECTRIC GENERATING PLANT UNIT 1 REVISION 7 TO INSERVICE INSPECTION PROGRAM PLAN AND ASSOCIATED RELIEF REQUESTS (TAC NO. M94236)

Dear Mr. McCoy:

By letter dated November 17, 1995, you submitted the Vogtle Electric Generating Plant Unit 1 (VEGP-1) First 10-Year Interval Inservice Inspection (ISI) Program Plan, Revision 7 and associated requests for relief from the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI. Included in the submittal are five revised requests for relief (RR-22, RR-23, RR-24, RR-30, and RR-43) and four new requests for relief (RR-59, RR-60, RR-61, and RR-62) as well as a number of minor editorial changes to the first 10-year ISI program.

The staff, with technical assistance from its contractor, the Idaho National Engineering Laboratory (INEL), has evaluated the information provided in your November 17, 1995, letter. Based on the information submitted, the staff adopts the contractor's conclusions and recommendations presented in the Technical Letter Report attached to the staff's enclosed Safety Evaluation (SE) for all of the relief requests. Revised request for relief RR-43 concerns removal of the snubber inservice inspection and testing program from the VEGP-1 Technical Specifications (TS). That request will be evaluated in connection with the processing of the TS amendment request seeking removal of the program. The staff concluded that there are no deviations from regulatory requirements or commitments identified in the First 10-Year Interval ISI Program Plan, Revisior 7 for VEGP-1. Furthermore, the staff concludes that the Code examination requirements are impractical for the welds contained in request for relief RR-30 (Part C-C) and that your proposed testing provides reasonable assurance of operational readiness of the subject pump integrally welded attachments; therefore, relief is granted pursuant to 10 CFR 50.55a(g)(6)(1).

The staff concluded that request for relief RR-22 remains granted, pursuant to 10 CFR 50.55a(g) ('(i), as determined in NRC Safety Evaluation dated November 26, 1991. Similarly, revised request RR-24 is granted pursuant to 10 CFR 50.55a(g)(6)(i) to encompass the two additional welds.

For relief granted pursuant to 10 CFR 50.55a(g)(6)(i), the staff has determined that the requirements of the Code are impractical and relief is authorized by law, will not endanger life, property, or the common defense and security. Such relief has been granted given due consideration to the burden that could result if the requirements were imposed on the facility.

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For equests for relief RR-23, RR-61 and RR-62, the staff concluded that your proposed alternative will provide an acceptable level of quality and safety. Therefore, the alternatives contained in RR-23 and RR-62 are authorized pursuant to 10 CFR 50.55a(a)(3)(i) as requested. The alternative contained in request for relief RR-61 (use of ASME Code Case N-509) is authorized pursuant to 10 CFR 50.55a(a)(3)(i) provided that you examine a minimum of 10% of the total number of integral attachments in Class 1, 2, and 3 systems. ASME Code Case N-509 is acceptable for use for the VEGP-1 first 10-year ISI interval, with the above condition, until such time as the Code Case is adopted for general use in Regulatory Guide 1.147. After that time, you must follow the conditions, if any, specified in the regulatory guide.

The staff concluded that for requests for relief RR-59 and RR-60, the Code requirements would result in a burden without a compensating increase in quality and safety. Furthermore, the staff concluded that your alternatives will provide reasonable assurance of the operational readiness of the affected systems. Therefore, your proposed alternatives contained in requests for relief RR-59 and RR-60 are authorized pursuant to 10 CFR 50.55a(a)(3)(ii).

If you have any questions regarding the enclosed Safety Evaluation, please contact Duke Wheeler at 301-415-1444.

Sincerely,

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Herbert N. Berkow, Director Project Directorate II-2 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Docket No. 50-424

Enclosure: Safety Evaluation

cc w/encl: See next page

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## Mr. C. K. McCoy

For requests for relief RR-23, RR-61 and RR-62, the staff concluded that your proposed alternative will provide an acceptable level of quality and safety. Therefore, the alternatives contained in RR-23 and RR-62 are authorized pursuant to 10 CFR 50.55a(a)(3)(i) as requested. The alternative contained in request for relief RR-61 (use of ASME Code Case N-509) is authorized pursuant to 10 CFR 50.55a(a)(3)(i) provided that you examine a minimum of 10% of the total number of integral attachments in Class 1, 2, and 3 systems. ASME Code Case N-509 is acceptable for use for the VEGP-1 first 10-year ISI interval, with the above condition, until such time as the Code Case is adopted for general use in Regulatory Guide 1.147. After that time, you must follow the conditions, if any, specified in the regulatory guide.

The staff concluded that for requests for relief RR-59 and RR-60, the Code requirements would result in a burden without a compensating increase in quality and safety. Furthermore, the staff concluded that your alternatives will provide reasonable assurance of the operational readiness  $3^4$  the affected systems. Therefore, your proposed alternatives contained in requests for relief RR-59 and RR-60 are authorized pursuant to 10 CFR 50.55a(a)(3)(ii).

If you have any questions regarding the enclosed Safety Evaluation, please contact Duke Wheeler at 301-415-1444.

Sincerely,

Herbert N. Berkow, Director Project Directorate II-2 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Docket No. 50-424

Enclosure: Safety Evaluation

cc w/encl: See next page

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cc:

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