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LCV-1016

May 29, 1997

Docket Nos.: 50-424,
50-425

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Ladies and Gentlemen:

**VOGTLE ELECTRIC GENERATING PLANT
SECOND TEN-YEAR INTERVAL INSERVICE INSPECTION PROGRAM**

Southern Nuclear Operating Company (SNC), the licensee and operator of the Georgia Power Company (GPC)-owned Vogtle Electric Generating Plant (VEGP), Units 1 and 2, hereby submits the Second Ten-Year Interval Inservice Inspection (ISI) Program in accordance with the requirements of 10 CFR 50.55a(g)(5)(i). The enclosed ISI program, which will be implemented May 31, 1997, was developed to comply with the requirements of the 1989 Edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code to the extent practical. As part of the update to this later NRC-approved version of ASME Section XI (Code), SNC identified certain requirements which were considered to be impractical. Where the Code requirements are considered to be impractical, requests for relief have been developed for alternative examinations and/or tests. In certain instances, requests for relief have been developed proposing alternatives to the Code requirements which would provide an acceptable level of quality and safety. SNC requests that the NRC grant the requests for relief provided in the enclosed ISI program document. The requested relief does not adversely affect public health and safety.

By letter LCV-0861 dated August 16, 1996, GPC (the former licensee and operator of VEGP and sister company to SNC, the current licensee and operator of VEGP) requested NRC concurrence to update the VEGP-2 ISI program for the second ten-year inspection interval approximately two years ahead of schedule. The early update of the VEGP-2 ISI Program would be coincident with the update for VEGP-1 and would allow ISI for the two VEGP units to be performed to the same edition of the Code. Otherwise, a different

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edition and/or addenda of the Code would have to be used for the ISI programs for each VEGP unit because of the differences in the commercial operation dates on which the ISI program interval dates are based. By concurrently updating the VEGP-1 and 2 ISI programs, a more comprehensive examination program will be achieved which will enhance the possibility of detecting a generic problem and will reduce costs involved with maintaining two separate ISI programs should the use of different code editions and/or addenda of ASME Section XI be required. In addition, the use of the same edition and/or addenda of ASME Section XI for the two VEGP units would help prevent possible errors associated with maintaining two separate ISI programs with different requirements should the early update of the VEGP-2 ISI Program not be allowed. As a result, the enclosed ISI program document is applicable to both VEGP units. Pursuant to the GPC letter of August 16, 1996, the enclosed ISI program document contains a request for relief for updating the ISI program for VEGP-2 ahead of schedule and requests an exemption from having to update the subject program at its normal update time, i.e., May 1999.

In order to maintain continuity with the first ten-year inspection interval, please be advised that it is our intention to use selected Requests for Relief which are contained in the enclosed ISI Program document during VEGP-1 Maintenance/Refueling Outage 1R7 currently scheduled to begin September 7, 1997. These include the following:

<u>Second Ten-Year Interval Request for Relief No.</u>	<u>Similar First Ten-Year Interval Request for Relief No.</u>	<u>Subject of Request for Relief</u>
RR-20	RR-61	ASME Section XI Code Case N-509
RR-23	RR-60	ASME Section XI Code Case N-498-1
RR-24	RR-59	ASME Section XI Code Case N-416-1
RR-29	RR-43	Snubber Examination and Testing Program

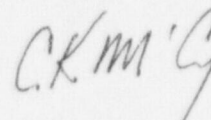
The aforementioned Second Ten-Year Interval Requests for Relief, for all practical purposes, are identical to those approved by the NRC for use during the first ten-year interval at VEGP. Their similar Requests for Relief for the first ten-year interval were

approved by the NRC as documented in correspondence dated March 8, 1996 to GPC. Discussions with NRC staff personnel have indicated that the subject Code Cases are to be included in Revision 12 of NRC Regulatory Guide 1.147 when issued and any caveats were identified. Any known caveats imposed by the NRC for use with the ASME Section XI Code Cases cited above are reflected in the subject Requests for Relief for the second ten-year interval. In the case of Request for Relief RR-29, the existing Snubber Examination and Testing Program which was recently relocated unchanged from the VEGP Standard Technical Specifications to the VEGP Technical Requirements Manual as allowed by the NRC through the Improved Technical Specifications program, will continue to be used.

In addition, we wish to use other Requests for Relief during the upcoming VEGP-1 Maintenance/Refueling Outage 1R7. Specifically, these include the following new Requests for Relief: RR-17, RR-22, RR-25, RR-26, and RR-28. Request for Relief RR-17 proposes the use of alternate weld selection criteria for Class 2 piping welds. Requests for Relief RR-22, RR-25, RR-26, and RR-28 concern the use of ASME Section XI Code Cases N-544, N-566, N-533, and N-508-1, respectively. Pending their final review and approval, SNC requests that the NRC grant interim approval of Requests for Relief RR-17, RR-22, RR-25, RR-26, and RR-28 by August 8, 1997 in order to allow their use during VEGP-1 Maintenance/Refueling Outage 1R7.

Should there be any questions in this regard, please contact this office. SNC personnel would be pleased to meet with the NRC staff should additional information be required.

Sincerely,



C. K. McCoy

CKM/JAE/jae

Enclosure: Vogtle Electric Generating Plant, Units 1 and 2,
Inservice Inspection Program - Second Ten-Year Interval

xc: (see next page for distribution)

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