

MAR 05 1986

Georgia Power Company
ATTN: Mr. R. J. Kelly
Executive Vice President
P. O. Box 4545
Atlanta, GA 30302

Gentlemen:

SUBJECT: VOGTLE READINESS REVIEW - INTERIM REVIEW QUESTIONS - MODULE NO. 16
"NUCLEAR STEAM SUPPLY SYSTEM"

We have completed an initial review of the subject module which you submitted to us on January 9, 1986, for evaluation. As a result of this initial review, the following questions and comments have been generated which need clarification and a written response.

ACCEPTABLE COMMITMENTS REQUIRING CORRECTIONS

The following commitments have been determined to be consistent with the Final Safety Analysis Report (FSAR), Safety Evaluation Report (SER) and Standard Review Plan (SRP). They are acceptable if the indicated corrections are made.

- (1) FSAR Section 3.2.2-1, Classification of Structures, Components and Systems, Commitment No. 847.

In the "Remarks" entry for this commitment in the Commitment Matrix in Section 3.4 of Module 16, it should show Table 3.2.2-1 instead of Table 2.2.2-1.

- (2) FSAR Section 5.2.1.1, Compliance with Codes and Code Cases, Commitment No. 188.

"Code Cases" should be removed from the description of this commitment. Code cases are discussed in FSAR Section 5.2.1.2.

- (3) FSAR Section 5.2.3.2.2, Compatibility with External Insulation and Environmental Atmosphere, Commitment No. 211.

The referenced FSAR Section should be 5.2.3.2.3 instead of 5.2.3.2.2.

- (4) FSAR Section 6.1.1.1, Engineered Safety Features Materials Specification Requirements, Commitment No. 326.

The referenced FSAR Section should be 6.1.1.1.1 instead of 6.1.1.1.

- (5) FSAR Section 6.1.1.1, Engineered Safety Features Materials--Containment Penetration Materials, Commitment No. 327.

The referenced FSAR Section should be 6.1.1.1.1 instead of 6.1.1.1.

- (6) FSAR Section 6.1.1.1.3.A, Engineered Safety Materials Integrity of Safety Related Components, Commitment No. 256.

The referenced FSAR Section should be 6.1.1.1.3 instead of 6.1.1.1.3.A. The entire FSAR Section 6.1.1.1.3 appears to be specific to Vogtle and all the appropriate Regulatory Guides, i.e., 1.31, 1.36, 1.37, and 1.44, should be incorporated.

OMITTED REGULATORY GUIDE COMMITMENTS

As part of our review, the corresponding SRP sections and the referenced Regulatory Guides were determined for the commitments submitted. The following Regulatory Guide commitments were apparently omitted from the Commitment Matrix in Section 3.4 of Module 16. These omissions should either be justified or provided in a revision to the Commitment Matrix.

- (1) FSAR Section 1.9.26 (Regulatory Guide 1.26), Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants.

Regulatory Guide 1.26 is referenced in FSAR Section 3.2.2. The VEGP classification system (FSAR Section 3.2.2) is included as a commitment (No. 1754). Furthermore, the seismic design classification (FSAR Section 1.9.29) is included as a commitment (No. 1532). Thus, the quality group classifications should be included as a commitment for consistency.

- (2) FSAR Section 1.9.71 (Regulatory Guide 1.71), Welder Qualification for Areas of Limited Accessibility.

Regulatory Guide 1.71 is referenced in FSAR Section 5.2.3.3.2. Field welds are plant specific. Thus, it appears that FSAR Section 1.9.71 is applicable to plant specific aspects of Vogtle and should be included as a commitment. Furthermore, since FSAR Section 5.2.3.3.2 is included as a commitment, the referenced Regulatory Guide should also be included as a commitment for consistency.

- (3) FSAR Section 1.9.147, (Regulatory Guide 1.147) Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1.

Regulatory Guide 1.147 is referenced in SRP Section 5.2.1.2 and should have been included in FSAR Section 5.2.1.2. (In Commitment No. 188, Code cases are incorrectly stated to be included in FSAR Section 5.2.1.1.) Acceptable Code cases evolve with time and are plant specific. Thus, FSAR Section 1.9.147 should be included as a commitment. Furthermore, since we believe that the FSAR Section 5.2.1.2 should be included as a commitment, the referenced Regulatory Guide should also be included as a commitment for consistency.

OMITTED FSAR COMMITMENTS

The commitments in Section 3.4 of Module 16 were evaluated for consistency and correctness. The following FSAR commitments were apparently omitted from the Commitment Matrix in Section 3.4 of Module 16:

(1) FSAR Section 3.2.1, Seismic Classification.

The seismic design classification (FSAR Section 1.9.29) is included as a commitment (No. 1532). Furthermore, the VEGP classification system (FSAR Section 3.2.2) is included as a commitment (No. 1754). Thus, the seismic classification should be included as a commitment for consistency.

(2) FSAR Section 5.2.1.2, Compliance with Code Cases.

Commitment No. 188 (FSAR Section 5.2.1.1) as stated in the Commitment Matrix in Section 3.4 of Module 16 incorrectly includes Code cases. Code cases are discussed in FSAR Section 5.2.1.2. Because the applicable Code cases are specific to Vogtle, FSAR Section 5.2.1.2 should be included as a commitment.

COMMITMENT CLARIFICATIONS

There are no commitments identified in certain FSAR sections that appear to be within the scope of the nuclear steam supply system. Conversely, there are commitments identified in certain FSAR sections that appear to be outside the scope of the nuclear steam supply system. Also, there is a slight inconsistency in the referenced Code edition in one of the commitments. Thus, the following clarifications are requested:

(1) FSAR Section 3.1.4, Nuclear Steam Supply System Components Design Classification, Commitment No. 1727.

FSAR Section 3.1.4 indicates that Westinghouse classifies nuclear steam supply system components according to ANSI N18.2-1973. However, FSAR Section 1.9.26.2 indicates that Westinghouse classifies components within its scope of supply using ANSI N18.2a-1975. Clarification is required for the specific referenced ANSI Code edition.

(2) FSAR Section 5.2.4, Inservice Inspection and Testing of Reactor Coolant Pressure Boundary, and FSAR Section 6.6, Inservice Inspection of Class 2, 3 Components.

Preservice and inservice inspections (PSI and ISI) are plant specific and relief can be requested on a plant specific basis. Thus, PSI and ISI should be included as commitments. However, FSAR Sections 5.2.4 and 6.6 indicate the need for license conditions and FSAR Sections 5.2.4.3 and 6.6 (PSI program) contain open items. Clarification of the assumptions regarding commitments in the area of PSI and ISI is needed.

(3) FSAR Section 5.3.2, Pressure-Temperature Limits.

Because the properties of reactor vessel materials vary from plant to plant, operating limitations are based on the specific properties of the reactor vessel materials at Vogtle. Thus, FSAR Section 5.3.2 appears to be specific to Vogtle and should be included as a commitment. Furthermore, because Regulatory Guide 1.99 is referenced, FSAR Section 1.9.99 (Effects of Residual Elements on Predicted Radiation Damage to Reactor Vessel Materials) should also be included as a commitment.

(4) FSAR Section 5.3.3, Reactor Vessel Integrity.

The applicable Code edition, the materials surveillance program, and the fracture toughness of the reactor vessel materials are specific to Vogtle. Thus, it appears that FSAR Section 5.3.3 should be included as a commitment. Furthermore, because Regulatory Guide 1.99 is referenced, FSAR Section 1.9.99 (Effects of Residual Elements on Predicted Radiation Damage to Reactor Vessel Materials) should also be included as a commitment.

(5) FSAR Section 5.4.2.5, Steam Generator Inservice Inspection.

The steam generator (SG) preservice and inservice inspections may be plant specific items. Accordingly, SG inspection would be included as commitments and the referenced Regulatory Guide would also be included. Clarification of the assumptions regarding commitments in the area of SG inspections is needed.

(6) FSAR Section 6.1, Engineered Safety Features Materials, and FSAR Section 6.2.2, Containment Heat Removal Systems.

Some commitments in FSAR Sections 6.1 and 6.2.2 have been included in Module 16. However, Module 16 is for the nuclear steam supply system. Thus, it does not seem appropriate to include these commitments in Module 16. Furthermore, commitments in the engineered safety features and containment heat removal systems are scattered in various Modules. Thus, it is difficult for the reviewers to establish consistency and determine program completeness in evaluating the systems. Clarification of the assumptions used in regard to the inclusion of these systems in Module 16 and in regard to the plant specific versus generic aspects of these systems is needed.

Please review these comments and questions and provide a written response. Your input is requested to be received on or before March 30, 1986. Please coordinate your written response and any telecons you may require with W. H. Rankin (404-331-4197) of my staff.

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Your assistance in responding to this request for additional information is appreciated.

Sincerely,

Original Signed by
Roger D. Walker

Roger D. Walker, Director
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cc: (Continued on page 6)

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