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October 16, 1998

Docket No. 50-321

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

Edwin I. Hatch Nuclear Plant - Unit 1  
Reactor Pressure Vessel Shell Welds Examination

Ladies and Gentlemen:

This letter supercedes the letter from Southern Nuclear Operating Company (SNC) to the NRC dated September 18, 1998.

SNC has scheduled examination of the Reactor Pressure Vessel (RPV) shell welds during the Spring 1999 Maintenance/Refueling Outage. These examinations are required to satisfy 10 CFR 50.55a(g)(6)(ii)(A) and were previously deferred to the Spring 1999 Maintenance/Refueling Outage as allowed by 10 CFR 50.55(a)(g)(6)(ii)(A)(3). The original scope of examination included all accessible RPV circumferential and axial shell welds. However, on July 28, 1998, the NRC issued a Safety Evaluation Report (SER) for the Boiling Water Reactor (BWR) Vessel and Internals Project Report, "BWR Reactor Pressure Vessel Shell Weld Inspection Recommendations (BWRVIP-05)." The BWRVIP-05 report provided justification for excluding the examination of RPV circumferential shell welds and recommended examination of only the axial shell welds. The NRC SER endorsed the recommendations included in the BWRVIP-05 report and indicated that licensees may request relief from the inservice inspection requirements of 10 CFR 50.55a(g) for volumetric examination of the RPV circumferential shell welds by demonstrating: (1) at the expiration of their license, the circumferential welds satisfy the limiting conditional failure probability for circumferential welds in this evaluation, and (2) they have implemented operator training and established procedures that limit the frequency of cold over pressure events to the amount specified in this report. The SER also indicated that the NRC intended to issue a Generic Letter (GL) informing BWR licensees that relief from circumferential RPV shell weld examinations, per the proposed BWRVIP-05 report, will be considered on a plant-specific basis.

On August 4, 1998, the BWRVIP Committee Chairman issued a letter to BWRVIP members indicating that the committee will be working with utilities to assist in providing information needed to obtain permanent relief in accordance with the forthcoming NRC GL.

On August 7, 1998, in Federal Register Volume 63, Number 152, Page 42460-42461, the NRC published a Draft GL which provided guidance for licensees seeking relief from the requirement for examination of BWR RPV circumferential shell welds as recommended in the BWRVIP-05 report. The GL indicated that permanent relief would be granted on a plant-specific basis provided that the licensee's justification for relief adequately addressed the two criteria listed in the first paragraph above.

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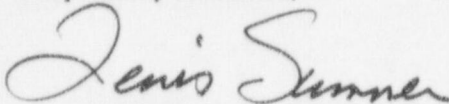
October 16, 1998

On August 13, 1998, the BWRVIP Committee Chairman issued another letter to BWRVIP Committee Members stating that the BWRVIP is continuing to work with the NRC staff to identify more specifically the information that utilities will need to provide to obtain permanent relief from the requirement for examination of RPV circumferential shell welds. The BWRVIP expects to provide BWRVIP utilities with an example of the information that needs to be provided to the NRC staff in the near future.

SNC intends to follow the example provided by the BWRVIP for obtaining permanent relief for examination of the RPV circumferential shell welds, however, this information may not be available in sufficient time to support activities presently scheduled for the upcoming Spring 1999 Unit 1 outage. Therefore, SNC requests the delay of inspection of the RPV circumferential shell welds for two operating cycles as outlined in NRC Information Notice 97-63, Supplement 1: "Status of NRC Staff's Review of BWRVIP-05." SNC's technical justification is based on the results of the BWRVIP Beltline Team's extensive evaluation discussed in the previous paragraphs and SNC's implementation of the plan outlined in the attachment. SNC's technical justification insures that an acceptable level of quality and safety will have been achieved and public health and safety will not be endangered by allowing the proposed alternative to the augmented examination requirements. Therefore, SNC requests that the proposed alternative be authorized pursuant with 10 CFR 50.55a(a)(3)(i). In order to plan for the inspections required during the Spring 1999 outage, NRC response to the alternative is requested by January 15, 1999.

Should you have any questions in this regard, please contact this office.

Respectfully submitted,



H. L. Sumner, Jr.

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Attachment: Plan and Schedule for Examination of Plant Hatch Unit 1 RPV Shell Welds

cc: Southern Nuclear Operating Company  
Mr. P. H. Wells, Nuclear Plant General Manager  
SNC Document Management (R-Type A02.001)

U. S. Nuclear Regulatory Commission, Washington, D. C.  
Mr. L. N. Olshan, Project Manager - Hatch

U. S. Nuclear Regulatory Commission, Region II  
Mr. L. A. Reyes, Regional Administrator  
Mr. J. T. Munday, Senior Resident Inspector - Hatch

Attachment

Edwin I. Hatch Nuclear Plant  
Plan and Schedule for Examination of Plant Hatch Unit 1 RPV Shell Welds

- Reserve examination equipment and personnel to perform RPV axial shell weld volumetric examination from the vessel inside surface during the spring 1999 Unit 1 Refueling Outage.
- Perform volumetric examination of the accessible length of each RPV axial shell weld.
- Review the guidance, or example, provided by the BWRVIP Committee for development of a request to obtain permanent relief from the requirement to examine RPV circumferential shell welds.
- Collect information to justify the two additional criteria included in NRC SER for BWRVIP-05 Report (i.e., (1) at the expiration of the current license, the circumferential welds will satisfy the limiting conditional failure probability for circumferential welds in this evaluation, and (2) implementation of operator training and establishment of procedures that limit the frequency of cold over pressure events to the amount specified in this report).
- Develop a relief request, to be incorporated into the ISI Program, from the requirement for the examination of the RPV circumferential shell welds.
- Submit relief request for RPV circumferential shell welds prior to expiration of requested 2-cycle deferral (as allowed by IN 97-63, Supp. 1)