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January 29, 1998

LCV-1016-G

10 A017

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 CLARIFICATION TO INSERVICE INSPECTION PROGRAM <u>REQUEST FOR RELIEF RR-20</u>

By letter LCV-1016 dated May 29, 1997, Southern Nuclear Operating Company (SNC) submitted the Second Ten-Year Inservice Inspection Program for the Georgia Power Company-owned Vogtle Electric Generating Plant (VEGP), Units 1 and 2. Contained therein was Request for Relief RR-20 which requested NRC approval for the use of ASME Section XI Code Case N-509, "Alternative Rules for the Selection and Examination of Class 1, 2, and 3 Integrally Welded Attachments". Use of the subject Code Case requires that ten percent (10%) of the integrally welded attachments for vessels, piping, pumps, and valves be examined.

Recent communication with NRC staff suggests that our Request for Relief RR-20 does not explicitly state that 10% of the integrally welded attachments for vessels, piping, pumps, and valves will be examined if ASME Section XI Code Case N-509 is used. As a result, we wish to clarify our proposed use of the subject Code Case. SNC will examine a minimum of 10% of the ASME Section XI integrally welded attachments in each piping, pump, and valve examination item number listed in ASME Section XI Code Case N-509, Table 2500-1. These examinations will be distributed among the non-exempt integrally welded attachments in each piping system contained in VEGP's Class 1, 2, and 3 systems and components. In the case of the examination item numbers relating to pressure vessels, Note 4 of Table 2500-1 will be used in the selection of integrally welded attachments to be

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examined. This will result in over 10% of the total pressure vessel integrally welded attachments being selected for examination.

With our having provided clarification on the proposed us of ASME Section XI Code Case N-509, we respectfully request that you expeditiously complete your review of Request for Relief RR-20 so that it may used during VEGP-2 Maintenance/Refueling Outage 2R6 which is currently scheduled to begin March 8, 1998.

Should there be any questions in this regard, please contact this office.

Sincerely,

C.K. MCCos

CKM/JAE/jae

INEEL Research Center xc Mr. M. T. Anderson

> Southern Nuclear Operating Company Mr. J. B. Beasley, Jr. Mr. W. L. Burmaister Mr. M. Shewani NORMS

U. S. Nuclear Regulatory Commission Mr. D. H. Jaffe, Senio: Project Manager, NRR Mr. L. A. Reyes, Regional Administrator Senior Resident Inspector, Vogtle