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SOUTHERN COMPANY
Energy to Serve Your World™

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LCV-1124

Docket No.: 50-424

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

Ladies and Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
REVISION 8 TO FIRST 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), submits herein ten copies of Revision 8 to the inservice inspection (ISI) program for VEGP Unit 1 (VEGP-1) for its first ten-year inservice inspection interval. The first ten year inservice inspection interval was for the period from May 31, 1987 though May 30, 1997, excluding the one year grace period allowed by 10 CFR 50.55a for completion of all required examinations. The enclosure provides Revision 8 to VEGP-1 ISI Program document ISI-P-006. The program in effect for the first ten-year inservice inspection interval was written to the requirements of the 1983 Edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, with Addenda through Summer 1983 except where relief has been granted by the NRC. The enclosed document supersedes portions of the original ISI program previously submitted to the NRC.

All required examinations were completed during the interval except for certain examinations which were completed during our most recent maintenance/refueling outage which was completed on October 20, 1997. No other examinations remain to be completed to fulfill the ASME Section XI requirements for the first ten-year inservice inspection interval. The results of the remaining examinations necessary to complete the examination requirements for the first ten-year inservice inspection interval will be addressed in the Owner's Report for Inservice Inspection for VEGP-1 Maintenance/Refueling Outage 1R7 which will be submitted to the NRC under separate cover by January 20, 1998.

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The Revision 8 changes to the VEGP-1 ISI Program include the following:

- Modification of existing Relief Requests RR-2, RR-3, RR-4, RR-5, and RR-30,
- Addition of new Relief Requests RR-63 and RR-64, and
- Minor editorial changes.

Existing Relief Requests RR-2 and RR-3 were previously approved by the NRC but approval was later revoked through rulemaking to 10 CFR 50.55a since they concerned ASME Section XI Category B-A, Item No. B1.10 reactor pressure vessel (RPV) welds. The subject relief requests are being re-submitted to the NRC for review and approval because full-Code examination coverage greater than ninety percent (90%) is not possible. A full-Code examination is considered to be one where examination coverage is greater than 90% as discussed in ASME Section XI Code Case N-460. That Code Case has been approved by the NRC for use as documented in NRC Regulatory Guide 1.147. Similarly, new Relief Request RR-63, which concerns ASME Section XI Category B-A, Item No. 1.10 reactor pressure vessel welds, is submitted for NRC review and approval and involves examination coverage limitations whereby a full-Code examination is not capable of being performed for the affected welds. Relief Requests RR-2, RR-3, and RR-63 constitute requested relief from both the requirements of the ASME Section XI Code *and* 10 CFR 50.55a(g)(6)(ii)(A).

Existing Relief Request RR-2 is revised to address examination limitations for weld 11201-V6-001-W06 which is an RPV lower shell-to-bottom head weld. Examination coverage for this ASME Section XI Category B-A, Item No. B1.11 weld is limited to approximately 62% due to six core support lugs physically obstructing a portion of the subject weld. As a result, the examination coverage achievable for the subject weld does not constitute a full-Code examination. No alternate examinations are practical.

Existing Relief Request RR-3 is revised to address examination limitations for welds 11201-V6-001-W18, 11201-V6-001-W19, and 11201-V6-001-W20, which are RPV lower shell longitudinal welds. Examination coverage for each of these three ASME Section XI Category B-A, Item No. B1.12 welds was limited to approximately 75% percent coverage due to core support lugs physically obstructing a portion of the subject welds. As a result, the achievable examination coverages for the subject welds do not constitute full-Code examinations. No alternate examinations are practical.

Existing Relief Requests RR-4, which was previously reviewed and approved by the NRC, is withdrawn. This relief request involved ASME Section XI Category B-A, Item B1.20 welds; specifically, RPV meridional welds 11201-V6-001-W21, 11201-V6-001-W22,

11201-V6-001-W23, and 11201-V6-001-W24. During inservice inspection activities, each of these welds had examination coverage greater than 90% thereby constituting a full-Code examination. As a result, the subject relief request is withdrawn.

Existing Relief Request RR-5, which was previously reviewed and approved by the NRC, is revised to address examination limitations for RPV bottom head circumferential weld 11201-V6-001-W07. This is an ASME Section XI Category B-A, Item No. B1.21 weld. Examination coverage for this weld is limited to approximately 29% and therefore does not constitute a full-Code examination. This RPV bottom head circumferential weld is physically obstructed due to in-core flux instrumentation tubes. No alternate examination is practical.

Existing Relief Request RR-30, which was previously reviewed and approved by the NRC, has been revised to add Boron Injection Tank (BIT) weld 11204-V6-001-W05 to Attachment 1 of the relief request. Examination coverage limitations were experienced on the bottom side of this ASME Section XI Category C-C, Item No. C3.10 weld while performing the surface examination. Specifically, the examination was limited to approximately 64% coverage due to the bracket and support configuration. As a result, a full-Code examination was unable to be performed due to the limitations experienced. A supplemental visual examination was performed to augment the required surface examination. In addition, a reference to Relief Request RR-62 was added for welds associated with the Regenerative Heat Exchanger, Excess Letdown Heat Exchanger, Letdown Heat Exchanger, Letdown Reheat Heat Exchanger, and the Discharge Pulsation Dampener as identified in Attachment 1 to Relief Request RR-30. Relief Request RR-62 was previously reviewed and approved by the NRC in its letter dated March 8, 1996 to GPC. Attachment 1 to Relief Request RR-30 was also revised to correct the ASME Item Number for Discharge Pulsation Dampener weld number 11208-V4-002-W01 from C1.10 to C1.20.

New Relief Request RR-63 requests relief from the examination coverage requirements for RPV welds 11201-V6-001-W12, 11201-V6-001-W13, and 11201-V6-001-W14 which are RPV upper shell longitudinal welds. These welds are also ASME Section XI Category B-A, Item No. B1.12. In each case, examination coverage was limited to less than 90% due to physical obstructions created by RPV nozzles. Examination coverage was limited to approximately 75%, 80%, and 85% for welds 11201-V6-001-W12, 11201-V6-001-W13, and 11201-V6-001-W14, respectively. As a result, a full-Code examination could not be performed due to the physical obstructions involved. No alternate examinations are practical.

New Relief Request RR-64 has been added resulting from a concern identified by the Authorized Nuclear Inservice Inspector (ANII) who found that any repairs of piping and components 1-inch nominal pipe size (NPS) and smaller may not have been properly documented, e.g., use of Owner's Reports for Repairs and Replacements (ASME Form NIS-2), due to a misunderstanding of the ASME Section XI Code requirements. This concern was previously identified to the NRC in GPC letter LCV-0932 dated January 8, 1997. Our review indicated that both VEGP units appear to have been in non-compliance since the beginning of commercial operation for any repairs of piping and components 1-inch NPS and smaller. It is our position that no compensating increase in the level of safety would be achieved for either VEGP unit were compliance with the Code requirements invoked retroactively for the first ten-year inservice inspection interval for any repairs which may have been performed to piping and components 1-inch NPS and smaller. Relief will also be requested for VEGP Unit 2 (VEGP-2) and will be submitted under separate cover as part of Revision 8 to VEGP-2 ISI Program document ISI-P-014. Subsequent to the identification of this potential non-compliance, plant personnel responsible for repair activities have been instructed that repairs, irrespective of the size of piping and components involved, are to be properly documented (including use of ASME Form NIS-2), the repair/replacement procedure was revised, and a training course was held.

The remaining changes in Revision 8 to the VEGP-1 ISI Program for the First Ten-Year ISI Interval are editorial in nature. Specifically, these include, but are not limited to, changing references, where appropriate, from Georgia Power Company to Southern Nuclear Operating Company due to the transfer of the plant operating licenses earlier in 1997. Incorporation of the editorial changes do not change the intent and scope of the ISI Program for VEGP-1 for the First Ten-Year ISI Interval.

Please refer to the enclosed ISI program revision for details on the changes described above. A summary of the changes resulting from Revision 8 to the VEGP-1 ISI Program is provided in the enclosure and precedes the affected document pages.

The NRC is requested to review and grant approval of the enclosed ISI program revision in accordance with the requirements of 10 CFR 50.55a as detailed in the affected relief requests. The subject changes do not affect public health and safety.

We wish to clarify a statement made previously to the NRC in GPC letter LCV-0817 dated July 30, 1996. That letter submitted the Owner's Report for Inservice Inspection for VEGP-1 Maintenance/Refueling Outage 1R6. The transmittal letter incorrectly noted that the remaining valve bolting visual examinations for Safety Injection (SI) System

valves 11204U6128 and 11204U6129 were being reported as not having been inspected pursuant to a request from the NRC in its letter dated November 26, 1991 to GPC, the former licensee and operator of VEGP and sister company to SNC. The subject GPC letter should have stated that the *internal surfaces* of these SI valves, rather than the valve bolting, had not been visually examined during the interval. The NRC letter of November 26, 1991 required that GPC identify to the NRC any pumps or valves for which an internal examination had not been performed during the inservice inspection interval. This was required by the NRC in lieu of mandatory disassembly of a pump or valve for the sole purpose of performing a visual examination on its internal surfaces. Based on our compliance with the surface examination requirement cited in the subject NRC letter, no relief request is being submitted, nor considered by SNC to be required, for SI valves 11204U6128 and 11204U6129.

Should there be any questions in this regard, please contact this office at your earliest convenience.

Sincerely,

C. K. McCoy

CKM/JAE/jae

Enclosure: Revision 8 to VEGP-1 First Ten-Year Interval ISI Program document ISI-P-006

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