

To: John Lamb,
Project Manager, U.S. Nuclear Regulatory Commission

Cc: NRC Document Control Desk
NRC Resident Inspector – Vogtle Electric Generating Plant

Subject: Submission of Proposed Alternative to Submitting Vogtle Unit 2 Inservice Inspection Summary Report Within 90 Days of Outage Completion

Reference: NRC Letter from H. Nieh to NEI, “*U.S. Nuclear Regulatory Commission Planned Actions Related to the Requirements for ASME Code Inservice Inspection Reporting During the Coronavirus Disease 2019 Public Health Emergency*,” dated April 9, 2020

As a result of the Coronavirus Disease 2019 (COVID-19) public health emergency (PHE), Southern Nuclear Operating Company (SNC) requests an alternative from certain reporting requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, IWA-1400, IWA-6240, and 10 CFR 50.55a(b)(2)(xxxii), as applicable, for Vogtle Electric Generating Plant (VEGP) Unit 2. This alternative is being requested pursuant to 10 CFR 50.55a(z)(2), *Hardship without a compensating increase in quality and safety*. ASME B&PV Code, Section XI, IWA-1400, IWA-6240, and 10 CFR 50.55a(b)(2)(xxxii) state, in part, that inservice inspection summary reports shall be submitted to the U. S. Nuclear Regulatory Commission (NRC) within 90 calendar days of the completion of each refueling outage. IWA-6230 of the ASME B&PV Code, Section XI, which is incorporated by reference in 10 CFR 50.55a, requires licensees to complete an inservice inspection summary report within 90 days after the conclusion of a refueling outage, per Mandatory Appendix II. As an alternative to the requirements of Section XI, ASME Code Case N-532-5 allows for the use of the Owners Activity Report (OAR-1), which provides a summary of items with flaws or relevant conditions that required evaluation for continued service, and repair and replacement activities required for continued service that occurred during the previous operating cycle.

The reference letter allows for an expedited review of a request for a deferral, provided certain information is provided. In accordance with the Reference letter, the following information is provided:

Station	Current Code Edition of Record	Current Due Date of OAR-1	Proposed Alternate Submission Date of OAR-1
Vogtle Electric Generating Plant Unit 2	ASME Section XI 2007 Edition through 2008 Addenda	12/10/2020	90 days after PHE has ended or prior to the beginning of the subsequent refueling outage, whichever is earlier.

This alternative is necessary based on SNC and associated vendor measures to maintain Centers for Disease Control and Prevention (CDC) recommended quarantine and social distancing requirements. These requirements have resulted in a hardship, as several individuals responsible for the preparation of this report have been unable to perform their functions in a timely and efficient manner.

The bulk of the effort to prepare the owners activity report is associated with work order close out and review. Each work order associated with ASME Section XI work for the previous operating cycle needs to be completed, closed, reviewed, and archived by maintenance and clerical personnel. Preparing this report requires a significant amount of worker-hours to prepare. Site programs engineering personnel, quality control, supply chain, maintenance, welding engineer, in-service inspection engineer and the ANII are constantly reviewing the work along the way to ensure code compliance.

To minimize the impact of COVID-19 on plant operations and onsite activities, personnel responsible for reviewing and closing maintenance work orders (WOs) are working staggered shifts. These staggered shifts have resulted in inefficiencies that have led to increases in maintenance work order processing time because SNC has not fully implemented an Electronic Work Packages process and therefore relies on paper WOs. These paper WOs are routed through various departments for signature approvals and only one copy is maintained to avoid any traceability concerns for duplicate copies. Processing these word order packages electronically (i.e. scanning and sending remotely) is not a viable option to expedite these activities for two reasons: 1) Multiple personnel are constantly reviewing and revising work order documentation associated with the OAR, and use of scanned copies would increase the risk of error due to loss of traceability of the original work orders; and 2) Work orders may be several hundred pages and contain pages of various physical sizes, which makes scanning and sending via email problematic.

In using paper WOs during staggered shifts, there are inefficiencies in reviews due to only having a limited amount of quality control personnel (1) on-site at a time to perform quality control post-reviews each day, compile missing data during the review process, and obtain signatures in the proper order during the review process.

In addition, during the Vogtle Unit 2 refueling outage 21 (2R21), several qualified personnel required for processing and review of this work were quarantined due to COVID-19. Significant delays in work order processing occurred compared to previous outages because personnel quarantined could not be onsite for an extended period of time to process work orders in a timely manner.

Due to Vogtle's staggered shifts and qualified personnel unavailability, completion of the OAR within 90 days of 2R21 outage completion results in a hardship. Therefore, compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

VEGP has established procedures to retain records of its completed inspection items that are easily accessible for NRC inspection, specifically, NMP-ES-018, SNC Inservice Inspection Engineering Program, and NMP-ES-018-011, Inservice Inspection (ISI) Examinations Records.

SNC requests approval of this Alternative by December 4, 2020.

Respectfully,



Cheryl A. Gayheart
Regulatory Affairs Director