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February 9, 2021

Docket Nos.: 52-025
52-026

ND-21-0070
10 CFR 50.55a

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4
Revision to Request for Alternative:
Alternative Requirements for ASME Section XI Examination Coverage of
Weldolet Branch Connection Welds (VEGP 3&4-PSI/ISI-ALT-15R1)

Ladies and Gentlemen:

Pursuant to 10 CFR 50.55a(z)(2), Southern Nuclear Operating Company (SNC), the licensee for Vogtle Electric Generating Plant (VEGP) Units 3 and 4, requested an alternative to the requirements of Section XI, IWA-2200, of the ASME Boiler and Pressure Vessel (B&PV) Code, 2007 Edition through 2008 Addenda (code of record) for VEGP Units 3 and 4, by SNC letter ND-20-1414, dated December 23, 2020 [ADAMS Accession No. ML20358A178].

The requested code alternative included a proposal to conduct best effort volumetric examination techniques conducted to the maximum extent practical for weldolet branch connection welds on the Reactor Coolant System (RCS) pressure boundary for Automatic Depressurization System (ADS) Stage 1 piping. These examinations were proposed in lieu of the ASME Code requirement for essentially 100 percent of volumetric examination coverage.

During a public call held on January 28, 2021, the NRC staff provided clarification questions in regard to SNC Letter ND-20-1414. This submittal includes revisions to the attachments in ND-20-1414 to address the requested clarifications. All changes are marked with revision bars.

Enclosures 1 through 5 were provided with the original VEGP 3&4-PSI/ISI-ALT-15, SNC letter ND-20-1414. To provide clarification for the NRC Staff, Enclosures 6 through 10 are provided herein which replace Enclosures 1 through 5 of ND-20-1414 in their entirety.

Enclosure 6 provides the revised proposed alternative with an updated "requested by" date, and revised Figures 1 through 5.

Enclosure 7 provides the revised proprietary technical description of the flaw tolerance evaluation conducted by Westinghouse on the subject weldolet branch connections. Enclosure 7 is requested to be withheld from disclosure to the public under 10 CFR 2.390.

Enclosure 8 provides the revised non-proprietary technical description of the flaw tolerance evaluation conducted by Westinghouse on the subject weldolet branch connections.

Enclosure 9 provides the Westinghouse affidavit for withholding proprietary information contained in Enclosure 7. Enclosure 7 contains information proprietary to Westinghouse Electric Company LLC ("Westinghouse"), and is supported by the affidavit signed by Westinghouse, the owner of the information. The Affidavit sets forth the basis on which the information may be withheld from public disclosure by the Nuclear Regulatory Commission ("Commission") and addresses with specificity the considerations listed in paragraph (b)(4) of Section 2.390 of the Commission's regulations.

Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations.

Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse Affidavit should reference CAW-21-5146 and should be addressed to Camille T. Zozula, Manager, Infrastructure & Facilities Licensing, Westinghouse Electric Company, 1000 Westinghouse Drive, Suite 165, Cranberry Township, Pennsylvania 16066.

Enclosure 10 provides the SNC affidavit for withholding proprietary information contained in Enclosure 7.

This letter contains no regulatory commitments. This letter has been reviewed and confirmed to not contain security-related information. Should you have any questions, please contact Mr. Steven Leighty at (706) 848-6790.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 9th of February 2021.

Respectfully submitted,



Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4
Southern Nuclear Operating Company

- Enclosures: 6) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Revision to Proposed Alternative in Accordance with 10 CFR 50.55a(z)(2) – Alternative Requirements for ASME Section XI Examination Coverage of Weldolet Branch Connection Welds (VEGP 3&4-PSI/ISI-ALT-15R1)
- 7) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Revision to Westinghouse Proprietary Technical Description of the Flaw Tolerance Evaluation Conducted on the Subject Weldolet Branch Connections **(Withheld Information)**
- 8) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Revision to Westinghouse Non-Proprietary Technical Description of the Flaw Tolerance Evaluation Conducted on the Subject Weldolet Branch Connections (Non-Proprietary)
- 9) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Affidavit from Westinghouse for Withholding Under 10 CFR 2.390 (CAW-21-5146), Proprietary Information Notice, and Copyright Notice (VEGP 3&4-PSI/ISI-ALT-15R1)
- 10) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Affidavit from Southern Nuclear Operating Company for Withholding Under 10 CFR 2.390 (VEGP 3&4-PSI/ISI-ALT-15R1)

cc:

Southern Nuclear Operating Company/ Georgia Power Company

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Document Services RTYPE: VND.LI.L06

File AR.01.02.06

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