



Michael J. Yox
Regulatory Affairs Director
Southern Nuclear Company

7825 River Road, BIN 63031
Waynesboro, GA 30830
706-848-6459 tel

myox@southernco.com

June 3, 2021

Docket No.: 52-025

ND-21-0392
10 CFR 50.55a

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

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
Request for Alternative: Alternative Requirements for ASME Section III Remediation of
Containment Vessel Unistrut Welding (VEGP 3-ALT-16)

Ladies and Gentlemen:

Pursuant to 10 CFR 50.55a(z)(1), Southern Nuclear Operating Company (SNC), the licensee for Vogtle Electric Generating Plant (VEGP) Units 3 and 4, requests NRC authorization to use an alternative to the requirements of Section III, NCA-3131, NE-4411, NE-4435(a)(1), NE-4435(a)(4) and NE-4610 of the ASME Boiler and Pressure Vessel (B&PV) Code, 2001 Edition through 2002 Addenda for VEGP Unit 3. The proposed request for alternative is applicable to activities related to the Containment Vessel (CV) ASME N-Certificate Holder's execution of a remediation plan before the 10 CFR 52.103(g) finding, with residual weld material remaining in place for the life of the plant. The details of the 10 CFR 50.55a(z)(1) request are contained in the enclosure to this letter. Approval is requested by July 30, 2021, to support completion of the Containment System (CNS) ASME Code Section III Compliance ITAAC (ITAAC 91).

During NRC public teleconference calls on April 22, April 29, and May 27, 2021, SNC presented drafts of the alternative request and received feedback from the NRC in preparation for the final submittal of this letter and its enclosures.

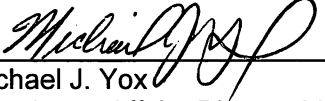
Enclosure 1 provides the proposed alternative VEGP 3-ALT-16 in accordance with 10 CFR 50.55a(z)(1).

Enclosure 2 provides the Procedure Qualification Record No. 14162 performed by CB&I.

Enclosure 3 provides the Procedure Qualification Record No. 14163 performed by CB&I.

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

Respectfully submitted,



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

- Enclosures: 1) Vogtle Electric Generating Plant (VEGP) Unit 3 – Proposed Alternative in Accordance with 10 CFR 50.55a(z)(1) – Alternative Requirements for ASME Section III Remediation of Containment Vessel Unistrut Welding (VEGP 3-ALT-16)
- 2) Vogtle Electric Generating Plant (VEGP) Unit 3 – CB&I Procedure Qualification Record 14162
- 3) Vogtle Electric Generating Plant (VEGP) Unit 3 – CB&I Procedure Qualification Record 14163

cc:

Southern Nuclear Operating Company / Georgia Power Company

Mr. S. E. Kuczynski (w/o enclosures)

Mr. P. P. Sena III (w/o enclosures)

Mr. M. D. Meier (w/o enclosures)

Mr. G. Chick

Mr. S. Stimac

Mr. P. Martino

Mr. D. L. McKinney (w/o enclosures)

Mr. T. W. Yelverton (w/o enclosures)

Mr. B. H. Whitley

Mr. W. Levis

Ms. C. A. Gayheart

Ms. M. Ronnlund

Mr. J. M DeLano

Mr. M. J. Yox

Mr. C. T. Defnall

Mr. J. Tupik

Ms. A. C. Chamberlain

Mr. S. Leighty

Ms. K. Roberts

Mr. J. Haswell

Mr. D. T. Blythe

Mr. K. Warren

Mr. A. S. Parton

Mr. A. Nix

Document Services RTYPE: VND.LI.L00

File AR.01.02.06

Nuclear Regulatory Commission

Mr. M. King (w/o enclosures)

Mr. G. Bowman

Ms. M. Bailey (w/o enclosures)

Ms. A. Veil

Mr. G.J. Khouri

Mr. G. Armstrong

Mr. C. Patel

Mr. C. Santos

Mr. B. Kemker

Mr. J. Eargle

Mr. C. J. Even

Ms. N. C. Covert

Mr. C. Welch

Mr. J. Gaslevic

Mr. O. Lopez-Santiago

Mr. M. Webb

Mr. B. Gleaves

Mr. T. Fredette

U.S. Nuclear Regulatory Commission
ND-21-0392
Page 4 of 4

Ms. K. McCurry
Mr. B. Davis
Mr. J. Parent
Mr. B. Grimman
Mr. P. McKenna

State of Georgia
Mr. R. Dunn

Oglethorpe Power Corporation
Mr. M. W. Price
Mr. B. Brinkman
Mr. E. Rasmussen

Municipal Electric Authority of Georgia
Mr. J. E. Fuller
Mr. S. M. Jackson

Dalton Utilities
Mr. T. Bundros

Westinghouse Electric Company, LLC
Mr. L. Oriani (w/o enclosures)
Mr. T. Rubenstein (w/o enclosures)
Mr. M. Corletti
Mr. D. Hawkins
Mr. J. Coward

Other
Mr. S. W. Kline, Bechtel Power Corporation
Ms. L. A. Matis, Tetra Tech NUS, Inc.
Dr. W. R. Jacobs, Jr., Ph.D., GDS Associates, Inc.
Mr. S. Roetger, Georgia Public Service Commission
Mr. R.L. Trokey, Georgia Public Service Commission
Mr. K. C. Greene, Troutman Sanders
Mr. S. Blanton, Balch Bingham