



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 25, 2021

Mr. Brian H. Whitley, Director
Regulatory Affairs
Southern Nuclear Operating Company, Inc.
3535 Colonnade Parkway, Bin N-226-EC
Birmingham, AL 35243

SUBJECT: ALTERNATIVE REQUIREMENTS FOR AMERICAN SOCIETY OF
MECHANICAL ENGINEERS SECTION III REMEDIATION OF CONTAINMENT
VESSEL UNISTRUT WELDING, VOGTLE ELECTRIC GENERATING PLANT,
UNIT 3 (EPID L-2021-LLR-0041)

Dear Mr. Whitley:

By letter dated June 3, 2021, and response to request for additional information dated July 2, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML21154A211 and ML21183A174, respectively), Southern Nuclear Operating Company (SNC or licensee) submitted a request to the U.S. Nuclear Regulatory Commission (NRC) to use an alternative to the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section III, 2001 Edition including the 2002 Addenda, requirements for 12 containment vessel (CV) welds attaching Unistrut at the Vogtle Electric Generating Plant (VEGP), Unit 3. SNC stated that the alternative (VEGP 3-ALT-16) was submitted in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR):

10 CFR 50.55a(z)(1), the licensee requested to use the proposed alternative on the basis that the proposed alternative would provide an acceptable level of quality and safety.

The proposed alternative would allow the licensee to remediate the 12 CV Unistrut welds by mechanically removing six pieces of Unistrut material, grinding twelve unqualified welds flush with the CV wall and leaving unqualified weld metal on the inside surface of the CV for the life of the plant at VEGP, Unit 3. The NRC staff finds there is reasonable assurance of structural integrity of the CV subject to the proposed alternative, VEGP 3-ALT-16, which demonstrated through weld coupon testing that the CV material was not adversely affected and by performing thickness measurements, surface examinations, leakage testing, and documentation of the remediation in the appropriate ASME Code data reports.

As set forth in the attached safety evaluation, the NRC staff determined that the proposed alternative is acceptable. Accordingly, the NRC staff finds that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(z)(1) and concludes that the proposed alternative provides an acceptable level of quality and safety. Therefore, the NRC authorizes the use of VEGP 3-ALT-16 for the life of VEGP Unit 3. All other requirements of ASME Code, Sections III and XI and 10 CFR 50.55a for which an alternative has not been specifically requested and authorized remain applicable.

B. Whitley

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If you have any questions, please contact the Senior Project Manager, Billy Gleaves, at (301) 415-5848.

Sincerely,

/RA/

Philip McKenna, Chief
Vogtle Project Office
Office of Nuclear Reactor Regulation

Docket No.: 52-025

Enclosure:
Safety Evaluation

cc: See next page

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 DATED: JULY 25, 2021

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***Via email**

NRR-106

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