

March 22, 2022

Docket Nos.: 52-026

ND-22-0199
10 CFR 50.55a

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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**Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
Revision to Request for Alternative:
Alternative Requirements for Inservice Test Interval Code Edition, Unit 4
(VEGP 3&4-IST-ALT-01R2)**

Ladies and Gentlemen:

Pursuant to 10 CFR 50.55a(z)(1), Southern Nuclear Operating Company (SNC) requested NRC authorization to use an alternative to the requirements of 10 CFR 50.55a(f)(4)(i) and 10 CFR 50.55a(f)(4)(ii) regarding use of the latest edition and addenda of the ASME Operation and Maintenance of Nuclear Power Plants (OM) Code used in initial and successive inservice test (IST) intervals by SNC letter ND-19-1294, dated October 31, 2019 [ADAMS Accession Number ML19304C432]. This request was subsequently revised by SNC letter ND-20-0083, dated February 6, 2020 [ADAMS Accession Number ML20037A329]. The revised request was authorized by NRC on March 2, 2020 [ADAMS Accession Number ML20045D517] and established the initial Vogtle Unit 4 IST interval concurrent with the associated initial Vogtle Unit 3 IST interval. IST plans for each Unit's first interval were then combined into a single plan for both units.

The NRC staff authorization included a condition allowing the proposed alternative pursuant to 10 CFR 50.55a(z)(1) for VEGP Unit 4 for initial fuel load dates prior to November 23, 2022. As noted in discussions held with NRC Staff during the March 17, 2022 public meeting, SNC has experienced unforeseen delays and although the current fuel load date for Unit 4 is prior to November 23, 2022, there is some risk that the initial fuel load moving beyond November 23, 2022, and thus, to provide some certainty in IST plan preparation and program procedure development, SNC is requesting removal of the condition of a latest date for use of the alternative for the initial Unit 4 IST interval.

As noted in the alternative request, having both units on the same Code Edition for their initial intervals allows both IST programs to be developed utilizing the same edition of the applicable Codes, which makes it less complicated for involved personnel to become familiar with the Code requirements, provides consistency for IST between the units, and reduces the effort associated with surveillance procedure revisions for the program update and for maintenance of the program documents.

The Code of Record established for Unit 3, ASME OM Code 2012 Edition, is in accordance with the 10 CFR 50.55a requirements and represents requirements established by the NRC to adequately test the equipment for safe plant operation. Applying a common Code edition to both Unit 3 and Unit 4 provides for common requirements which minimizes potential errors caused by having to maintain two separate program requirements for the two units. Additionally, based on the version of the Code applied for the Unit 3 IST program, the units will use the same Code Edition as that used for Preservice testing, which provides further consistency of preservice and inservice testing.

Per NUREG-1482, Rev. 3, Basis for 3.3.2, Concurrent Intervals states “The staff believes that conducting IST programs for multiple unit sites using the same Code edition could provide an improvement in program effectiveness.”

These bases led to authorization of the alternative as providing an acceptable level of quality and safety in accordance with 10 CFR 50.55a(z)(1).

Finally, it is noted that the primary difference between the current IST Code of Record and an update to the 2017 Edition of the OM Code is Appendix IV for air operated valves (AOVs). Vogtle 3&4 UFSAR Subsection 3.9.6.4.5 describes the additional testing for AOVs previously included in the test program. As noted therein, the additional testing is performed as part of the AOV program, which includes the key elements for an AOV Program as identified in the Joint Owners Group (JOG) AOV program document, Revision 1, December 13, 2000. The AOV program incorporates the attributes for a successful power-operated valve long-term periodic verification program, as discussed in Regulatory Issue Summary 2000-03, Resolution of Generic Safety Issue 158: Performance of Safety-Related Power-Operated Valves Under Design Basis Conditions, by incorporating lessons learned from previous nuclear power plant operations and research programs as they apply to the periodic testing of air- and other power-operated valves included in the IST program. NRC is inspecting the AOV testing additions using Inspection Procedure (IP) 73758, including evaluating the additions against RIS 2000-03. As such, updating to the 2017 Edition would not significantly increase the level of safety and quality of the Unit 4 IST program.

Removing this alternative at this late date in the construction process would result in considerable burden without a corresponding increase in safety or quality. The Unit 3 IST program plan is complete utilizing the 2012 Edition, and efforts to-date are to develop procedures consistent with the IST program plan based on the 2012 Edition. With the resources required to complete Unit 3 construction, fuel load and power ascension, it would be a significant burden to develop a Unit 4 IST program to a different Code edition and develop or revise the Unit 4 procedures (this would essentially be a 10-year update prior to Unit 4 startup) and maintain the two units on different IST program plan update schedules over the life of the plants. Additionally, as previously discussed, having the two units on different editions creates an error likely situation for the periods where the two unit's IST program plans are based on different Code editions.

Both units are still on schedules such that Unit 4 initial fuel load is expected to follow Unit 3 initial fuel load by approximately one year. Allowing the two units to maintain consistent IST program plans will also reduce NRC burden as NRC is already reviewing the current plan and implementing procedures. The NRC staff will thus be able to apply results of Unit 3 inspection to the upcoming Unit 4 inspections if the plan is not required to be changed.

Therefore, SNC requests authorization of the alternative for the Unit 4 first interval concurrent with, and until the end of, the Unit 3 first interval. This ending of the applicability for the 2012 Edition of the OM code for Unit 4 would continue to provide an acceptable level of quality and safety in accordance with 10 CFR 50.55a(z)(1).

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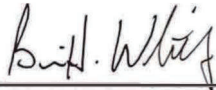
SNC requests authorization of this request in time to support finalization of the Unit 4 Inservice Testing Program at least 2 months prior to the then scheduled Unit 4 fuel load.

This letter contains no regulatory commitments. This letter has been reviewed and confirmed to contain no security-related information. Should you have any questions, please contact Ms. Amy Chamberlain at (205) 992-6361.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 22nd day of March 2022.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



Brian H. Whitley
Director, Regulatory Affairs
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cc:

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