

July 10, 2026

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50-364 50-425

NL-26-0159

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

Southern Nuclear Operating Company
Joseph M. Farley Nuclear Plant, Units 1 and 2
Vogtle Electric Generating Plant, Units 1 and 2
GEN-ISI-ALT-2026-01 – Request for Alternative to Use the
2019 Edition in Lieu of the 2021 Edition of the ASME Section XI
Boiler and Pressure Vessel Code for Inservice Inspection

Ladies and Gentlemen:

In accordance with 10 CFR 50.55a(a)(z)(1), Southern Nuclear Operating Company (SNC) hereby requests Nuclear Regulatory Commission (NRC) approval of proposed Inservice Inspection (ISI) alternative GEN-ISI-ALT-2026-01 for Farley Nuclear Plant (FNP) Units 1 and 2 and Vogtle Electric Generating Plant (VEGP) Units 1 and 2. GEN-ISI-ALT-2026-01 requests an alternative to the requirements of 10 CFR 50.55a(g)(4)(ii) pertaining to the 10-year update of the FNP and VEGP ISI program to the 2021 Edition of the American Society of Mechanical Engineers (ASME), Boiler and Pressure Vessel Code, Section XI.

ASME Section XI activities at SNC plants are standardized among the plants. Currently, the ISI programs at Hatch and Vogtle Units 3 and 4 use the 2019 Edition of Section XI. To maintain standardization of the SNC units, it is requested that Farley and Vogtle Units 1 and 2 also use the 2019 Edition of Section XI instead of the 2021 Edition. SNC believes this standard process improves the quality of the ISI programs at each of the units.

The Enclosure provides the justification for the requested alternative.

NRC approval is requested by January 12, 2027.

This letter contains no NRC commitments. If you have any questions, please contact Ryan Joyce at 205.992.6468.

Respectfully submitted,

Jamie M. Coleman
Regulatory Affairs Director

JMC/was/cbg

Enclosure: Proposed Alternative GEN-ISI-ALT-2026-01 in Accordance with
10 CFR 50.55a(z)(1)

cc: Regional Administrator, Region II
NRR Project Manager – Farley Nuclear Plant
NRR Project Manager – Vogtle Electric Generating Plant - Units 1 and 2
Senior Resident Inspector – Farley Nuclear Plant
Senior Resident Inspector – Vogtle Electric Generating Plant - Units 1 and 2
RType: CGA02.001

ENCLOSURE

Proposed Alternative GEN-ISI-ALT-2026-01 in Accordance with 10 CFR 50.55a(z)(1)

REQUEST FOR AN ALTERNATIVE

1. ASME Code Component(s) Affected
 - a. Code Class
 - i. American Society of Mechanical Engineers (ASME) Class 1, 2, and 3
 - b. References
 - i. ASME Section XI, 2019 Edition
 - ii. ASME Section XI, 2021 Edition
 - c. Examination Category
 - i. Various
 - d. Item Number
 - i. Various
 - e. Description
 - i. Alternative Requirements for the updates for the Sixth Interval ISI Program for Farley Units 1 and 2 and Fifth Interval ISI Program for Vogtle Units 1 and 2
 - f. Unit/Inspection Interval Applicability
 - i. Farley Nuclear Plant, Units 1 and 2 and Vogtle Electric Generating Plant Units 1 and 2
2. Requested Approval Date

The following table identifies the ASME Section XI Code of Record next interval start date for performing Inservice Inspection (ISI) activities at the Southern Nuclear fleet units:

Plant	ISI Interval	Interval Start Date
Farley Nuclear Plant, Units 1 and 2	6 th	12/01/27
Vogtle Electric Generating Plant, Units 1 and 2	5 th	05/31/27

Southern Nuclear is requesting approval by January 12, 2027.

3. Applicable Code Edition and Addenda

- i. Per 10 CFR 50.55a(g)(4)(ii), the code of record required for the Farley and Vogtle Units is the 2021 Edition, which was incorporated by reference into 10 CFR 50.55a(a) on 09/30/24. However, Farley and Vogtle are requesting to update to the 2019 Edition of the ASME Section XI Code.

4. Applicable Code Requirements

10 CFR 50.55a(g)(4)(ii) states for Successive code of record intervals

“Inservice examination of components and system pressure tests conducted during successive code of record intervals must comply with the requirements of the latest edition and addenda of the ASME BPV Code incorporated by reference in paragraph (a) of this section no more than 18 months before the start of the code of record interval” (or the optional ASME Code Cases listed in NRC Regulatory Guide 1.147, when using ASME BPV Code, Section XI, or NRC Regulatory Guide 1.192, when using the ASME OM Code, as incorporated by reference in paragraphs (a)(3)(ii) and (iii) of this section), “subject to any applicable conditions listed in paragraph (b) of this section”.

5. Reason for Request

The Southern Nuclear fleet includes Hatch Units 1 and 2, Farley Units 1 and 2, Vogtle Units 1 and 2, and Vogtle Units 3 and 4. Hatch and Vogtle Units 3 and 4 currently use the 2019 Edition of Section XI. Fleet procedures are used to ensure that the Section XI programs are implemented consistently across the fleet. However, because the next interval start dates differ by unit, the required code of record also differs. Southern Nuclear desires to maintain one code of record for all units. The following table shows the interval start dates for each unit:

Unit	Interval Start Date	Required Code of Record
Hatch Unit 1 ⁽¹⁾	03/29/26	2019
Hatch Unit 2 ⁽¹⁾	03/29/26	2019
Farley Unit 1 ⁽³⁾	12/01/27	2021
Farley Unit 2 ⁽³⁾	12/01/27	2021
Vogtle Unit 1 ⁽⁴⁾	05/31/27	2021
Vogtle Unit 2 ⁽⁴⁾	05/31/27	2021
Vogtle Unit 3 ⁽²⁾	07/31/23	2019
Vogtle Unit 4 ⁽²⁾	04/29/24	2019

- ¹ This is based on 18 months prior to the start of the interval (March 2026) per 10 CFR 50.55a(g)(4)(ii) and the latest edition incorporated by reference into 10 CFR 50.55a(a) on September 30, 2024.
- ² Vogtle 3 and 4 were approved to use the 2019 Edition of the ASME Section XI Code SER (ML25196A297).
- ³ Farley would be required to update to the 2021 Edition of Section XI in December of 2027.
- ⁴ Vogtle 1 and 2 would be required to update to the 2021 Edition of Section XI in May of 2027.

6. Proposed Alternative and Basis for Use

a. Proposed Alternative

In accordance with 10 CFR 50.55a(z)(1), Southern Nuclear proposes to comply with the ASME BPVC, Section XI, 2019 Edition, as an alternative to the ASME BPVC, Section XI, 2021 Edition required by 10 CFR 50.55a(g)(4)(ii) for the Farley and Vogtle Units 1 and 2 ISI Programs. In implementing this proposal, Southern Nuclear will comply with all NRC conditions as specified in 10 CFR 50.55a for the 2019 Edition of ASME BPVC, Section XI, including the augmented requirements. Code Cases will also be adopted per RG 1.147 for those cases applicable to the 2019 Edition.

b. Basis for Use

In accordance with 10 CFR 50.55a(z)(1), Southern Nuclear proposes to comply with the ASME BPVC, Section XI, 2019 Edition, as an alternative to the ASME BPVC, Section XI, 2021 Edition required by 10 CFR 50.55a(g)(4)(ii) for the Farley and Vogtle Units 1 and 2 ISI Programs.

A comprehensive evaluation was performed comparing the requirements of the 2019 Edition to those of the 2021 Edition to determine the impact of implementing the earlier edition for the subject intervals. This evaluation concluded that the 2019 Edition continues to provide an acceptable level of quality and safety. Specifically, the review determined:

- No changes in the 2021 Edition were identified that materially enhance or increase the level of quality and safety relative to the 2019 Edition.
- No revisions in the 2021 Edition were determined to correct deficiencies in the 2019 Edition.

Use of the 2019 Edition will not result in a reduction in the scope, frequency, or effectiveness of Inservice inspections, examinations, or pressure testing activities, nor will it relax applicable acceptance standards or required corrective actions.

Southern Nuclear will continue to implement all applicable 10 CFR 50.55a conditions, limitations, and augmented requirements associated with the 2019 Edition, as well as NRC-endorsed ASME Code Cases as identified in Regulatory Guide 1.147. Required Code Cases, including Code Case N-770-7, have been incorporated or will be implemented as applicable to ensure continued compliance with NRC requirements.

ASME Section XI programs within Southern Nuclear are implemented using a fleet-based, standardized approach across all units. The use of multiple Code Editions across the fleet would require maintaining separate ISI programs with differing technical and administrative requirements. This condition introduces additional complexity in program implementation, including planning, scheduling, execution, and evaluation of inspection activities.

Utilizing a single Code Edition (2019 Edition) across the fleet enhances the quality and safety of program implementation by:

- Improving configuration control and ensuring consistent application of program requirements,
- Reducing the potential for human error associated with implementing differing Code requirements,
- Enabling consistent training, qualification, and oversight of personnel, and
- Leveraging fleet-wide operating experience and lessons learned in the execution of ISI activities.

These factors support improved program execution and directly contribute to maintaining a high level of quality and safety.

Based on the evaluation and the programmatic controls described above, Southern Nuclear concludes that the use of the 2019 Edition of ASME BPVC, Section XI, in lieu of the 2021 Edition required by 10 CFR 50.55a(g)(4)(ii), provides an acceptable level of quality and safety. Therefore, authorization of this alternative is requested in accordance with 10 CFR 50.55a(z)(1).

C. Summary and Conclusions

10 CFR 50.55a(z) states:

Alternatives to codes and standards requirements. Alternatives to the requirements of paragraphs (b) through (h) of this section or portions thereof may be used when authorized by the Director, Office of Nuclear Reactor Regulation. A proposed alternative must be submitted and authorized prior to implementation. The applicant or licensee must demonstrate that:

- (1) *Acceptable level of quality and safety.* The proposed alternative would provide an acceptable level of quality and safety; or
- (2) *Hardship without a compensating increase in quality and safety.*
Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Based on the evaluation above, the use of the 2019 Edition of ASME BPVC, Section XI, in lieu of the 2021 Edition required by 10 CFR 50.55a(g)(4)(ii), provides an acceptable level of quality and safety in accordance with 10 CFR 50.55a(z)(1). The proposed alternative maintains technical adequacy while enhancing program consistency and reducing the potential for implementation errors, thereby supporting safe and effective ISI program execution across the Southern Nuclear fleet.

7. Duration of Proposed Alternative

The duration of the proposed alternative would be for the Farley Units 1 and 2 – 6th code of record interval and Vogtle Units 1 and 2 – 5th code of record interval.

8. Precedents

This request for alternative is similar to the following:

1. NRC Letter to Union Electric Company, Callaway Plant, Unit 1 - Request for Relief to Use a Subsequent Edition of the ASME Code Examinations for the Third Inservice Inspection Interval" Dated August 18, 2005 (ADAMS Accession No. ML052080215)
2. NRC Letter to Entergy Operations, Inc. for Arkansas Nuclear One, Unit 2, "Arkansas Nuclear One, Unit 2 - Request for Relief ANO2-ISI-003, Alternative to Use 2001 Edition through 2003 Addenda in lieu of the 2004 Edition of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI by letter dated April 26, 2010 (TAC No. ME1452)." (ML100970659)
3. NRC Letter to Virginia Electric and Power Company, "Surry Power Station, Unit Nos 1 and 2 - Relief from the Requirements of the ASME Section Code S1-15-ISI-01 & S2-15-ISI-01 Regarding Use of ASME Section XI 2004 Edition" dated April 29, 2013 (TAC NOS. ME8774 and ME8775) (ADAMS Accession No. ML13100A049)