

**Jeffrey T. Gasser**  
Vice President

**Southern Nuclear  
Operating Company, Inc.**  
40 Inverness Center Parkway  
Post Office Box 1295  
Birmingham, Alabama 35201  
  
Tel 205.992.7721  
Fax 205.992.0403



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U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555-0001

Vogtle Electric Generating Plant  
Clarification of the  
Response to Request for Additional Information Regarding  
Risk Informed Inservice Inspection Program Submittal

Ladies and Gentlemen:

On June 2, 2003, and June 10, 2003, telephone calls between the Staff, Southern Nuclear Operating Company (SNC), and Westinghouse were held to discuss the April 23, 2003, SNC response to a NRC request for additional information (RAI) regarding the Vogtle Electric Generating Plant (VEGP) Risk Informed Inservice Inspection (RI-ISI) Program Submittal. Pursuant to these discussions, the following information is supplied to clarify the SNC position regarding the use of multiple line size segments for the July 26, 2002, VEGP RI-ISI Program submittal.

Segments with multiple line sizes were treated as follows:

High Safety Significant (HSS) Segments with Multiple Line Sizes

There are 11 multiple pipe size HSS segments. Nine of these segments fully meet Westinghouse Owners Group (WOG) WCAP-14572, Revision 1-NP-A, "Westinghouse Owners Group Application of Risk-Informed Methods to Piping Inservice Inspection Topical Report." For the remaining two segments, the same number of examinations are being done as if these two multiple pipe size segments had been split by pipe size.

Low Safety Significant (LSS) Segments with Multiple Line Sizes

Each LSS segment with multiple line sizes and multiple Section XI inspections was separated into sub-segments based on pipe diameters for the change-in-risk evaluation. Credit for a Section XI ISI examination was then conservatively assigned to each sub-segment, and the change-in-risk calculations were re-run. The RI-ISI program, thus revised, still meets all change-in-risk requirements for Unit 1 and 2 with no additional inspections.

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It is the SNC and Westinghouse position that the intent of the NRC-approved WOG WCAP-14572 is being met, and this clarification to the SNC response to the NRC RAI regarding the VEGP RI-ISI Program submittal reinforces that position. Therefore, SNC requests that approval be given by July 31, 2003, to implement the RI-ISI Program at VEGP as submitted on July 26, 2002, in order to support the September 2003 VEGP Unit 1 refueling outage.

This letter contains no NRC commitments. If you have any questions, please advise.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey T. Gasser', with a long horizontal flourish extending to the right.

Jeffrey T. Gasser

JTG/DRG/daj

cc: Southern Nuclear Operating Company  
Mr. J. D. Woodard, Executive Vice President  
Mr. W. F. Kitchens, General Manager – Plant Vogtle  
Mr. M. Sheibani, Engineering Supervisor – Plant Vogtle  
Document Services RTYPE: CVC7000

U. S. Nuclear Regulatory Commission  
Mr. L. A. Reyes, Regional Administrator  
Mr. F. Rinaldi, NRR Project Manager – Vogtle  
Mr. J. Zeiler, Senior Resident Inspector – Vogtle