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Energy to Serve Your World™

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U. S. Nuclear Regulatory Commission
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Washington, D. C. 20555-0001


Edwin I. Hatch Nuclear Plant
Third and Fourth 10-Year Interval Inservice Inspection (ISI) Programs
Submittal to Respond to NRC Request for Additional Information

Ladies and Gentlemen:

By letter dated March 30, 2005 Southern Nuclear Operating Company (SNC) submitted relief requests, alternatives, and an exemption request for the Edwin I. Hatch Nuclear Plant Fourth 10-Year Interval ISI program. In response to subsequent discussions with NRC staff, Enclosure 3 of the March 30, 2005 letter, Alternative ISI-ALT-1 was revised. A revised alternative was submitted on August 2, 2005, to replace the version submitted by the March 30, 2005 letter. A Request for Additional Information was received from the NRC on September 12, 2005. Enclosure 1 contains our response to the three (3) requests for additional information. Enclosure 3 modifies our previous submittal of ISI-ALT-1.

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

Sincerely,



H. L. Sumner, Jr.

HLS/PAH/daj

Enclosure: Enclosure 1 - Responses to NRC Request for Information of
September 12, 2005
Revised Enclosure 3 of August 2, 2005 Letter - ISI-ALT-1, Version 2

cc: Southern Nuclear Operating Company
Mr. J. T. Gasser, Executive Vice President
Mr. G. R. Frederick, General Manager – Plant Hatch
RTYPE: CHA02.004

U. S. Nuclear Regulatory Commission
Dr. W. D. Travers, Regional Administrator
Mr. C. Gratton, NRR Project Manager – Hatch
Mr. D. S. Simpkins, Senior Resident Inspector – Hatch

Enclosure 1 - Responses to NRC Request for Information of September 12, 2005

**Edwin I. Hatch Nuclear Plant
Third and Fourth 10-Year Interval Inservice Inspection (ISI) Programs
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Enclosure 1
Responses to NRC Request for Information of September 12, 2005

1. The applicable Code requirements being referenced are from an edition and addenda that is before the 2001 Edition of the Code. The licensee should reference the applicable sub-articles and paragraphs from the 2001 Edition of the Code, with the 2003 Addenda.

Response

4th interval examinations will be performed per the requirements of ASME Section XI, 2001 Edition through the 2003 Addenda, as amended by 10 CFR 50.55a. However, the NRC amended the use of the 2001 Edition through the 2003 Addenda in paragraph 10 CFR 50.55a(b)(2)(xxiv), which states, *"The use of Appendix VIII and the supplements to Appendix VIII and Article I-3000 of Section XI of the ASME BPV Code, 2002 Addenda through the latest edition and addenda incorporated by reference in paragraph (b)(2) of this section, is prohibited."* Therefore, when referencing Appendix VIII, the 2001 Code is the latest approved Code. All other references apply to the 2001 Edition through the 2003 Addenda of the Section XI Code.

2. Subarticle I-2210 of the 2001 Edition of the Code with the 2003 Addenda, requires examination of the flanges using Section XI, Appendix III, which has a prescriptive-based procedure and examination criteria for flaw detection and performance-based performance based Appendix VIII qualified personnel and procedures for flaw characterization. The proposed alternative is silent on examinations for detecting flaws. Discuss the examination requirements that will be used for detecting flaws.

Response

I-2210(b) of the 2001 Edition of the Code with the 2003 Addenda requires that ultrasonic examination of reactor vessel-to-flange welds, closure head-to-flange welds, and integral attachment welds shall be conducted in accordance with Article 4 of Section V, except that alternative examination beam angles may be used. These examinations shall be further supplemented by Table I-2000-1.

SNC proposes to use the below listed examination methodology in lieu of the I-2210(b) Section XI Code requirements; however, it should be noted that SNC may use the Section XI requirements, if deemed appropriate at the time of examination. It should also be noted that a discussion on limitations was added for clarity. Actual coverage due to these limitations will be calculated after the examinations are performed, and a relief request will be submitted to the NRC if required. Considerations of alternative examinations will be addressed at that time.

C-1 - Vessel-to-Flange Weld

Limitations - This examination will be performed from the outside surface of the vessel. The curvature of the flange limits transducer travel such that scanning can only be performed from the shell side of the weld and as shown in Figure 1 (of ISI-ALT-1) the refueling bellows prevents scanning from the upper portion of the flange surface located above the curvature.

Examination Requirements - SNC proposes to use a single side angle beam examination that will be performed using examination procedures, personnel, and equipment qualified through the PDI process in accordance with Appendix VIII, Supplements 4 and 6. Projected coverage for flaws

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Responses to NRC Request for Information of September 12, 2005

located parallel to weld is shown in Figure 2 of ISI-ALT-1. Since the examination will be from a single side, the requirements of 10 CFR 50.55a(b)(2)(xvi)(A) apply. Therefore, examinations will be conducted with equipment, procedures, and personnel that have demonstrated proficiency with single side examinations. (To demonstrate equivalency to two sided examinations, the demonstration must be performed to the requirements of Appendix VIII as modified by this paragraph and 10 CFR 50.55a(b)(2)(xv) (B) through (G), on specimens containing flaws with non-optimum sound energy reflecting characteristics or flaws similar to those in the vessel being examined). Scanning will be performed as follows:

- Per 10 CFR 50.55a(b)(2)(xv)(G)(1), the clad to base metal interface, including a minimum of 15 percent T (measured from the clad to base metal interface), shall be examined from four orthogonal directions using procedures and personnel qualified in accordance with Supplement 4 to Appendix VIII.
- Per 10 CFR 50.55a(b)(2)(xv)(G)(2), if the clad-to-base-metal-interface procedure demonstrates detectability of flaws with a tilt angle relative to the weld centerline of at least 45 degrees, the remainder of the examination volume is considered fully examined if coverage is obtained in one parallel and one perpendicular direction. This must be accomplished using a procedure and personnel qualified for single-side examination in accordance with Supplement 6. Subsequent examinations of this volume may be performed using examination techniques qualified for a tilt angle of at least 10 degrees.
- Per 10 CFR 50.55a(b)(2)(xv)(G)(3), the examination volume not addressed by 50.55a(b)(2)(xv)(G)(1) is considered fully examined if coverage is obtained in one parallel and one perpendicular direction, using a procedure and personnel qualified for single sided examination when the provisions of § 50.55a(b)(2)(xv)(G)(2) are met.

HC-2 - Head-to-Flange Weld

Limitations - As shown in Figure 1 (of ISI-ALT-1), the configuration allows scanning from both the head side and the flange side of the weld; however, the short distance from the weld to the flange limits the amount of scanning that can be performed on the flange side of weld.

Examination Requirements – The head is not clad; therefore, SNC proposes to use an angle beam examination that will be performed using examination procedures, personnel, and equipment qualified through the PDI process in accordance with Appendix VIII, Supplement 6 as modified by 10 CFR 50.55a(b)(2)(xv)(D), 10 CFR 50.55a(b)(2)(xv)(E), and other applicable paragraphs. Scanning will be performed in four orthogonal directions to the extent practical. Projected coverage for flaws located parallel to weld is shown in Figure 3 of ISI-ALT-1.

[It should be noted that there are no scanning requirements in 10 CFR 50.55a for this unclad weld. Paragraphs 10 CFR 50.55a(b)(2)(xv)(G)(1) and 10 CFR 50.55a(b)(2)(xv)(G)(2) apply only to clad-to-base metal interface configurations and do not apply to this unclad configuration. Additionally, 10 CFR 50.55a(b)(2)(xv)(G)(3) requires that the provisions of 10 CFR 50.55a(b)(2)(xv)(G)(2) be met, so can not apply.]

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3. In the basis section of the submittal, the licensee makes a statement that the vessel flange examination will be eliminated because it does not improve flaw detection. Please provide supporting detail for the statement. Identify the scanning requirements that will be followed. Provide sketches of the examination volume showing the proposed scanning directions and transducer angles.

Response

The referenced statement has been eliminated.

Revised Enclosure 3 of August 2, 2005 Letter - ISI-ALT-1, Version 2

**Edwin I. Hatch Nuclear Plant
Third and Fourth 10-Year Interval Inservice Inspection (ISI) Programs
Submittal to Respond to NRC Request for Additional Information**

Enclosure 3
Southern Nuclear Operating Company (SNC)
ISI-ALT-1, Version 3.0
Proposed Alternative in Accordance with 10 CFR 50.55a(a)(3)(i)

Plant Site-Unit:	Edwin I. Hatch Nuclear Plant-Units 1 and 2.
Interval-Interval Dates:	4 th ISI Interval extending from January 1, 2006 through December 31, 2015.
Requested Date for Approval and Basis:	Approval is requested by December 1, 2005 to support examinations performed during 1R22 (scheduled for February 2006).
ASME Code Components Affected:	Category B-A, reactor pressure vessel (RPV) shell-to-flange weld C-1 (Item B1.30) and head-to-flange weld HC-2 (Item B1.40).
Applicable Code Edition and Addenda:	<p>Fourth interval examinations will be performed per the requirements of ASME Section XI, 2001 Edition through the 2003 Addenda, as amended by 10 CFR 50.55a.</p> <p>The NRC amended the use of the 2001 Edition through the 2003 Addenda in paragraph 10 CFR 50.55a(b)(2)(xxiv), which states, "<i>The use of Appendix VIII and the supplements to Appendix VIII and Article I-3000 of Section XI of the ASME BPV Code, 2002 Addenda through the latest edition and addenda incorporated by reference in paragraph (b)(2) of this section, is prohibited.</i>" Therefore, when referencing Appendix VIII, licensees are limited to using the 2001 Code; however, other references apply to the 2001 Edition through the 2003 Addenda.</p>
Applicable Code Requirements:	<p>These welds are currently required to be examined per Appendix I, I-2100(b) of the 2001 Edition of ASME Section XI through the 2003 Addenda, which requires that the examination be conducted in accordance with Article 4 of Section V, except that alternative beam angles may be used. Additionally, there is a requirement to supplement the Section V examinations with Table I-2000-1. Section T-472.1 of the 2001 Edition of Section V with the 2003 Addenda defines the ultrasonic scanning criteria for the examination of reactor vessel-to-flange welds and closure head-to-flange welds. These are:</p> <ul style="list-style-type: none">▪ (T-472.1.1) The beam angle shall be appropriate for the configuration being examined and that the beam angle shall be capable of detecting the calibration reflectors, over the required angle beam paths.▪ (T472.1.2) When scanning for reflectors parallel to the weld seam, the angle beam shall be directed at approximate right angles to the weld axis from both sides of the weld (i.e., from two directions) on the same surface when possible. The search unit shall be manipulated so that the ultrasonic energy passes through the required volume of weld and adjacent base material.

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- (T-472.1.3) When scanning for reflectors transverse (perpendicular) to the weld seam, the angle beam shall be directed essentially parallel to the weld axis. The search unit shall be manipulated so that the ultrasonic energy passes through the required volume of weld and adjacent base material. The search unit shall be rotated 180 degrees and the examination repeated.
- (T-472.2) Welds that cannot be fully examined from two directions using the angle beam techniques shall also be examined if possible with a straight beam technique.
- (T-472.3) Welds that cannot be examined from at least one side (edge) using the angle beam technique shall be noted in the examination report. For flange welds, the weld may be examined with a straight beam or low angle longitudinal waves from the flange surface provided the examination volume can be covered.

**Reason for
Request:**

10 CFR 50.55a required that ASME Section XI, Appendix VIII, Supplement 4, "Qualification Requirements For The Clad/Base Metal Interface of Reactor Vessel," and Supplement 6, "Qualification Requirements For Reactor Vessel Welds Other Than Clad/Base Metal Interface," be implemented for most of the RPV welds by November 22, 2000. However, the RPV shell-to-flange weld and head-to-flange weld examinations were not included in this requirement. The use of this alternative will allow the use of Performance Demonstration Initiative (PDI) qualified procedures to perform the examination of these welds in lieu of Article 4 of Section V requirements.

**Proposed
Alternative and
Basis for Use:**

Proposed Alternative

In lieu of the Article 4 of Section 5 angle beam examination, SNC proposes to use an angle beam examination that will be performed using examination procedures, personnel, and equipment qualified in accordance with Appendix VIII, Supplements 4 and 6, as amended by the conditions set forth in 10 CFR 50.55a. Examination of each weld is described below: (See Figure 1)

C-1 - Vessel-To-Flange Weld

The Section XI required examination volume will be scanned for flaws from the outside of the vessel using a 60-degree refracted longitudinal wave; however, the curvature of the flange surface above the weld will limit transducer travel such that examinations can only be performed from the shell side. Additionally, the refueling bellows prevents examinations from being performed from the vertical portion of the flange surface located directly above the curvature. The projected single side coverage for flaws located parallel to the weld is shown in Figure 2.

Since the examination will be from a single side, the requirements of 10 CFR 50.55a(b)(2)(xvi)(A) apply. Therefore, examinations will be conducted with equipment, procedures, and personnel that have demonstrated proficiency with single side examinations. (To demonstrate equivalency to two sided examinations, the demonstration must be performed to the requirements of Appendix VIII as modified

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ISI-ALT-1, Version 3.0
Proposed Alternative in Accordance with 10 CFR 50.55a(a)(3)(i)

by this paragraph and 10 CFR 50.55a(b)(2)(xv) (B) through (G), on specimens containing flaws with non-optimum sound energy reflecting characteristics or flaws similar to those in the vessel being examined). Examination of the Section XI required volume will be performed as follows:

Per 10 CFR 50.55a(b)(2)(xv)(G)(1), the clad to base metal interface, including a minimum of 15 percent T (measured from the clad to base metal interface), shall be examined from four orthogonal directions using procedures and personnel qualified in accordance with Supplement 4 to Appendix VIII.

Per 10 CFR 50.55a(b)(2)(xv)(G)(2), if the clad-to-base-metal-interface procedure demonstrates detectability of flaws with a tilt angle relative to the weld centerline of at least 45 degrees, the remainder of the examination volume is considered fully examined if coverage is obtained in one parallel and one perpendicular direction. This must be accomplished using a procedure and personnel qualified for single-side examination in accordance with Supplement 6. Subsequent examinations of this volume may be performed using examination techniques qualified for a tilt angle of at least 10 degrees.

Per 10 CFR 50.55a(b)(2)(xv)(G)(3), the examination volume not addressed by 50.55a(b)(2)(xv)(G)(1) is considered fully examined if coverage is obtained in one parallel and one perpendicular direction, using a procedure and personnel qualified for single sided examination when the provisions of § 50.55a(b)(2)(xv)(G)(2) are met.

HC-2 – Closure Head-To-Flange Weld

The Section XI required examination volume will be scanned for flaws using a 60-degree refracted longitudinal wave. Examinations will be performed from both the head and flange side of the weld; however, the short distance from the weld to the flange limits the examination on the flange side of weld. Scanning will be performed in four orthogonal directions to the extent practical with the projected coverage for flaws located parallel to the weld shown in Figure 3. This weld is not clad; therefore, the examination of the Section XI required volume will be performed using procedures, personnel, and equipment qualified through the PDI process in accordance with Appendix VIII, Supplement 6, as modified by 10 CFR 50.55a(b)(2)(xv)(D), 10 CFR 50.55a(b)(2)(xv)(E), and other applicable paragraphs.

Basis for Use

Appendix VIII requirements were developed to ensure the effectiveness of UT examinations within the nuclear industry by means of a rigorous, item-specific performance demonstration. The performance demonstration (through PDI) was conducted on RPV mockups containing flaws of various size and allocations. The demonstration established the capability of equipment, procedures, and personnel to find flaws that could be detrimental to the integrity of the RPV. The performance demonstration showed that for the detection of flaws in RPV welds, the UT techniques were equal to or surpassed the requirements of the Section V, Article 4 of the ASME Code. Additionally, the PDI qualified sizing techniques is considered to be more

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accurate than the techniques used in Article 4 of Section V.

Although Appendix VIII is not required for the RPV shell-to-flange weld and RPV head-to-flange weld, the use of Appendix VIII criteria for detection and sizing of flaws in these welds will be equal to or will exceed the requirements established by Article 4 of Section V. Therefore, the use of this proposed alternative will continue to provide an acceptable level of quality and safety, and approval is requested pursuant to 10 CFR 50.55a(a)(3)(i).

Duration of Proposed Alternative:	The proposed alternative is applicable for the 4 th Inservice Inspection Interval, extending from January 1, 2006 through December 31, 2015.
Precedents:	NA
References:	None
Status:	Awaiting NRC approval.

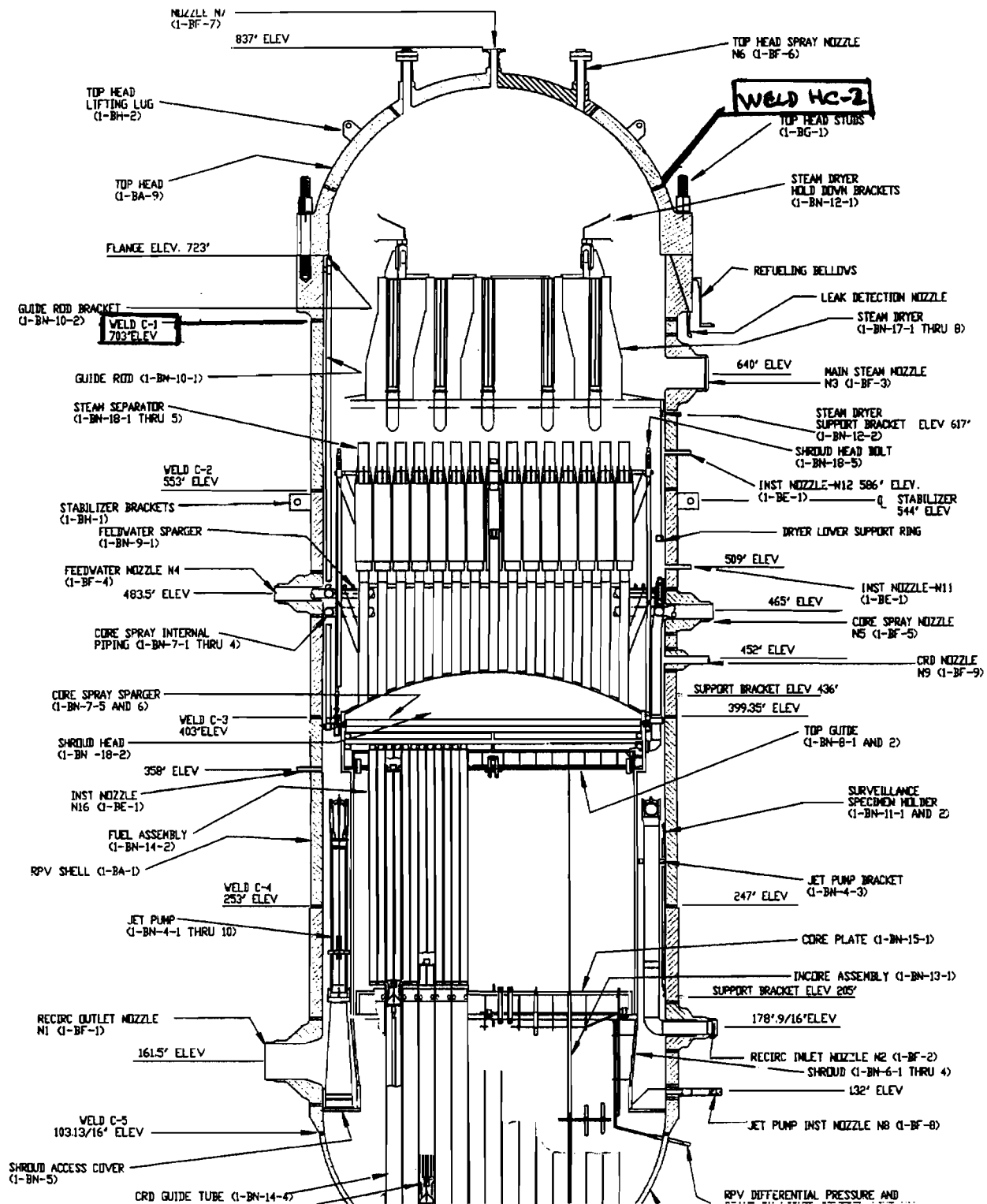
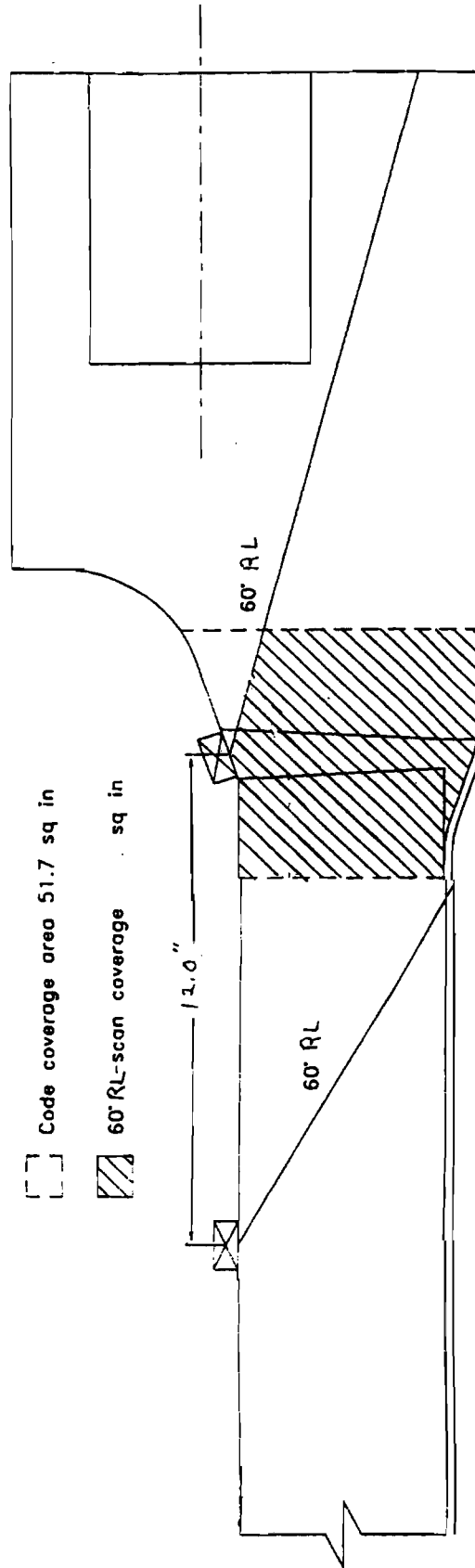


FIGURE 1

FIGURE 2

Hatch Unit 1
C-1 (HA1, RPV - FV) Weld



Hatch Unit 1
 1B11-HC-2 Weld
 Flange to Top Head

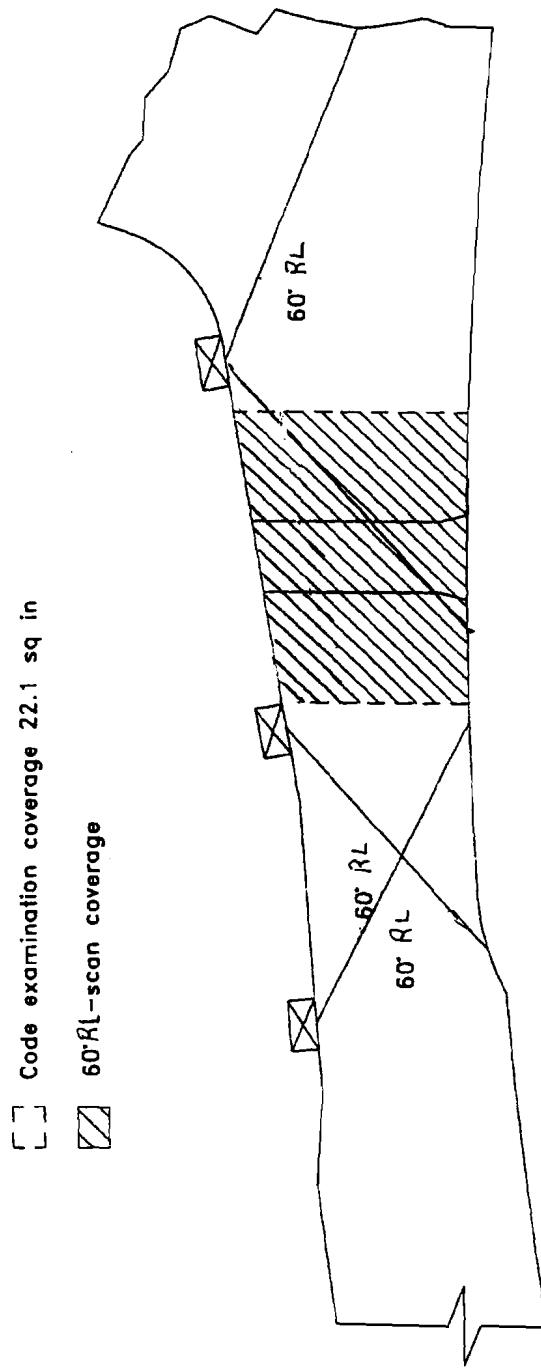


FIGURE 3