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

Joseph M. Farley Nuclear Plant
Edwin I. Hatch Nuclear Plant
Vogtle Electric Generating Plant
10 CFR 50.69 NRC Inspection Procedure 37060 and
EPRI 10 CFR 50.69 Alternative Treatment Guidance

Ladies and Gentlemen:

The Nuclear Regulatory Commission (NRC) by letter dated June 17, 2011, in response to Southern Nuclear Operating Company's (SNC) letter dated December 6, 2010, granted pilot status for the planned SNC Vogtle Electric Generating Plant (VEGP) 10 CFR 50.69 license amendment request (LAR).

By letter dated April 29, 2011, SNC submitted comments on the NRC Draft Inspection Procedure 37060 titled "10 CFR 50.69 Risk-Informed Categorization and Treatment of Structures, Systems, and Components Inspection." In that letter SNC endorsed the comments submitted by NEI in their May 2, 2011 letter and provided SNC comments on the subject inspection procedure. The final inspection procedure was issued in September and is substantially unchanged from the draft.

NEI submitted further comments regarding the subject inspection procedure by letter dated November 18, 2011. The NEI letter included three guidance documents developed by Electric Power Research Institute (EPRI), provided for the NRC's information. The three EPRI guidance documents support the implementation of alternative treatment for structures, systems and components (SSCs) per 10 CFR 50.69(d), consistent with the SSC's categorization by the 10 CFR 50.69(c) process.

This letter is to advise that SNC endorses the comments on the subject inspection procedure submitted by NEI in the referenced November 18, 2011 letter. SNC intends to utilize the EPRI guidance documents, included in the November 18, 2011 NEI letter, as much as is practical and appropriate for VEGP SSCs, consistent with their categorization. It is, therefore, important at this stage of the pilot process to ensure full alignment between NRC expectations and SNC's proposed 10 CFR 50.69 implementation approach.

Therefore, this letter also proposes an NRC/SNC meeting in March, 2012 to discuss further the subject inspection procedure and the referenced EPRI alternative treatment guidance documents. The suggested meeting date allows SNC, prior to the meeting, to progress further with development of the referenced pilot VEGP LAR, trial 10 CFR 50.69 categorization, and development of potential 10 CFR 50.69 alternative treatment approaches.

SNC appreciates your consideration of these issues. Further refinement of the subject inspection procedure must occur if a stable regulatory environment for those licensees choosing to implement 10 CFR 50.69 is to exist. Without a stable regulatory environment the intended benefits of implementing 10 CFR 50.69 will not be achieved, specifically improving plant safety and allowing enhanced allocation of company resources on the most important plant equipment. We look forward to working with you on this most important issue.

This letter contains no NRC commitments. If you have any questions, please contact Jack Stringfellow at (205) 992-7037.

Respectfully submitted,



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MJA/CLT/lac

cc: Southern Nuclear Operating Company
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