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April 27, 2015

Docket Nos.: 52-025
52-026

ND-15-0773
10 CFR 50.55a

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

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4
Request for Alternative:
ASME NPT Code Symbol Stamps (VEGP 3&4-PSI/ISI-ALT-03)

Ladies and Gentlemen:

Pursuant to 10 CFR 50.55a(z)(1), Southern Nuclear Operating Company (SNC) hereby requests NRC authorization to use an alternative to the requirements of Subsection NCA, Table NCA-8100-1, "Certificates and Code Symbol Stamps Issued by the Society for Construction of Nuclear Power Plants" for the 1998 Edition with the 2000 Addenda of Section III of the ASME Boiler and Pressure Vessel (B&PV) Code through all subsequent Editions and Addenda of Section III of the B&PV Code authorized for use in 10 CFR 50.55a(1)(i) with regard to ASME NPT Code Symbol Stamps. This request is designated VEGP 3&4-PSI/ISI-ALT-03. The proposed request for alternative is applicable for construction, pre-service inspection, and all ASME NPT Code Symbol Stamp activities until the 2011 Addenda to the 2010 Edition of ASME B&PV Code, Section III has been authorized for use by reference in 10 CFR 50.55a(1)(i).

The details of the 10 CFR 50.55a request are contained in the enclosure. Approval is requested by October 30, 2015, to ensure that SNC will continue to comply with the Code of Federal Regulations and the ASME B&PV Code with regard to ASME NPT Code Symbol Stamps.

This letter contains no regulatory commitments. Should you have any questions, please contact Mr. Wes Sparkman at (205) 992-5061.

Mr. Brian H. Whitley states that: he is the Regulatory Affairs Director of Southern Nuclear Operating Company; he is authorized to execute this oath on behalf of Southern Nuclear Operating Company; and to the best of his knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

Brian H. Whitley

Brian H. Whitley

BHW/DRG/ljs

Sworn to and subscribed before me this 27th day of April, 2015

Notary Public: *Kristin Marie Seibert*

My commission expires: August 16, 2016



Enclosure: Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Proposed Alternative
VEGP 3&4-PSI/ISI-ALT-03 in Accordance with 10 CFR 50.55a(z)(1) Regarding
ASME NPT Code Symbol Stamps

cc:

Southern Nuclear Operating Company / Georgia Power Company

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Mr. M. D. Meier
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Nuclear Regulatory Commission

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Other

Mr. R. W. Prunty, Bechtel Power Corporation

Ms. K. K. Patterson, Tetra Tech NUS, Inc.

Dr. W. R. Jacobs, Jr., Ph.D., GDS Associates, Inc.

Mr. S. Roetger, Georgia Public Service Commission

Ms. S. W. Kernizan, Georgia Public Service Commission

Mr. K. C. Greene, Troutman Sanders

Mr. S. Blanton, Balch Bingham

Mr. R. Grumbir, APOG

Mr. J. R. Bouknight, South Carolina Electric & Gas Company

Mr. D. Kersey, South Carolina Electric & Gas Company

Mr. B. Kitchen, Duke Energy

Mr. S. Franzone, Florida Power & Light

Southern Nuclear Operating Company

ND-15-0773

Enclosure

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

**Proposed Alternative VEGP 3&4-PSI/ISI-ALT-03
in Accordance with 10 CFR 50.55a(z)(1)**

Regarding

ASME NPT Code Symbol Stamps

Proposed Alternative VEGP 3&4-PSI/ISI-ALT-03
In Accordance with 10 CFR 50.55a(z)(1)

Plant Site-Unit:	Vogtle Electric Generating Plant (VEGP) – Units 3 and 4
Interval Dates:	Applies to VEGP 3&4 construction, pre-service inspection (PSI), and all American Society of Mechanical Engineers' (ASME) NPT Code Symbol Stamp activities until the 2011 Addenda to the 2010 Edition of ASME Boiler and Pressure Vessel (B&PV) Code, Section III has been authorized for use by reference in 10 CFR 50.55a(1)(i).
Requested Date for Approval:	Approval is requested by October 30, 2015 to ensure that Southern Nuclear Operating Company (SNC) will continue to comply with the Code of Federal Regulations (CFR) and the ASME B&PV Code Section III with regard to NPT Code Symbol Stamp activity.
ASME Code Components Affected:	ASME Section III, Division 1, Class 1, 2, and 3 parts, appurtenances, piping subassemblies, and tubular products welded with filler metal (NPT).
Applicable Code Edition and Addenda:	1998 Edition with the 2000 Addenda of Section III of the ASME B&PV Code through all subsequent Editions and Addenda of Section III of the B&PV Code authorized for use in 10 CFR 50.55a(1)(i).
Applicable Code Requirements:	ASME B&PV Code, Section III, Table NCA-8100-1, "Certificates and Code Symbol Stamps Issued by the Society for Construction of Nuclear Power Plants."
Reason for Request:	<p>The ASME has issued certain ASME NPT Code Symbol Stamps with a horizontal "NPT" that could be considered non-compliant with the illustration shown in the ASME B&PV Code, Section III, Division 1, Subsection NCA, Table NCA-8100-1, 2010 edition and earlier editions/addenda.</p> <p>On February 9, 2015, ASME approved Code Case N-852, "Application of the ASME NPT Stamp Section III, Divisions 1, 2, 3, and 5" allowing the ASME NPT Code Symbol Stamp with the NPT Letters arranged horizontally to be used for construction to the 2010 Edition and earlier Editions and Addenda of Section III. The Code Case also added a clarification that it is the opinion of the Committee that the NPT Code Symbol Stamp with the NPT letters arranged horizontally is equivalent to the NPT Code Symbol Stamp as depicted and required by NCA-8000. However, until Code Case N-852 is endorsed for use by the NRC in 10 CFR 50.55a, this alternative to the requirements of NCA-8000 is needed to ensure that SNC will continue to comply with the CFR and the ASME B&PV Code with regard to ASME NPT Code Symbol Stamps.</p>

Proposed Alternative VEGP 3&4-PSI/ISI-ALT-03
In Accordance with 10 CFR 50.55a(z)(1)

Proposed Alternative:	Allow the ASME Section III Code to use ASME Section III NPT Code Symbol Stamps with the horizontal "NPT" designator interchangeably with the currently authorized ASME Section III NPT Code Symbol Stamps.
Basis for Use:	<p>The following ASME Section III, Division 1 Code "NPT"-type Symbol Stamp is required by Code Editions and Addenda prior to 2011 Addenda to the 2010 Edition:</p> <div data-bbox="862 512 1024 674" data-label="Image"> </div> <p>The ASME has issued some ASME NPT Stamps with a horizontal "NPT" as shown below:</p> <div data-bbox="862 785 1019 936" data-label="Image"> </div> <p>These stamps with the horizontal "NPT" designation could be considered non-compliant with the illustration shown in the ASME B&PV Code, Section III, Division 1, Subsection NCA, Table NCA-8100-1, 2010 edition and earlier editions/addenda.</p> <p>In an ASME letter to the NRC dated August 27, 2014, the ASME informed the NRC that the ASME has reviewed the issue regarding these NPT stamps' non-compliance with the illustration shown in the ASME Code and it is the position of ASME that:</p> <div data-bbox="548 1293 672 1419" data-label="Image"> </div> <div data-bbox="829 1335 1045 1373" data-label="Text"> <p>is equivalent to</p> </div> <div data-bbox="1214 1293 1344 1419" data-label="Image"> </div> <p>Although these NPT Stamps differ slightly in appearance, they serve the same purpose of certifying code compliance by the ASME Certificate Holder with confirmation by the Authorized Nuclear Inspector and provide for the same level of quality assurance.</p> <p>There are no changes to any technical or quality requirements in the Code and this request does not impact any plant-specific DCD Tier 1 information, nor any ITAAC.</p> <p>Because this proposal is equal in both quality and safety, authorization is requested in accordance with 10 CFR 50.55a(z)(1) to use ASME Section III NPT Code Symbol Stamps with the horizontal "NPT" designator interchangeably with the currently authorized ASME NPT Code Stamp.</p>

Proposed Alternative VEGP 3&4-PSI/ISI-ALT-03
In Accordance with 10 CFR 50.55a(z)(1)

Duration of Proposed Alternative:	From date of issuance of authorization per this request until the 2011 Addenda to the 2010 Edition of ASME B&PV Section III Code has been authorized for use by reference in 10 CFR 50.55a(b)(1).
Precedents:	None identified.
References:	<ol style="list-style-type: none">1) 1998 Edition with the 2000 Addenda to the ASME B&PV Code, Section III2) 2010 Edition with the 2011 Addenda to the ASME B&PV Code, Section III3) ASME Code Case N-852, "Application of the ASME NPT Stamp Section III, Divisions 1, 2, 3, and 5," approved February 9, 20154) ASME letter to NRC, "ASME NPT Stamp Equivalency" dated August 27, 2014
Status:	Awaiting NRC authorization