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August 17, 2015

Docket Nos.: 52-025
52-026

ND-15-1406
10 CFR 50.55a

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

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4
Response to Request for Additional Information
Request for Alternative:
ASME NPT Code Symbol Stamps (VEGP 3&4-PSI/ISI-ALT-03S1)

Ladies and Gentlemen:

In accordance with 10 CFR 50.55a(z)(1), by letter dated April 27, 2015 (correspondence number ND-15-0773 [ADAMS Accession No. ML15117A444]), Southern Nuclear Operating Company (SNC), the licensee for Vogtle Electric Generating Plant (VEGP) Units 3 and 4, requested 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," of 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(a)(1)(i) with regard to ASME NPT Code Symbol Stamps. The details for this alternative request, designated VEGP 3&4-PSI/ISI-ALT-03, are contained in the Enclosure to SNC's April 27, 2015 letter.

On July 15, 2015, the Nuclear Regulatory Commission (NRC) Issued Request for Additional Information (RAI) Letter No. 06 [ADAMS Accession No. ML15196A631] to SNC regarding Code alternative request VEGP 3&4-PSI/ISI-ALT-03 (electronic RAI (eRAI) 8031); this request was received by SNC July 16, 2015. Enclosure 2 of this letter provides SNC's response to the questions posed in eRAI 8031. Enclosure 3 provides the ASME letter to the NRC's Director, Division of Engineering, regarding ASME NPT Stamp Equivalency. Enclosure 4 provides a subsequent ASME letter regarding recall of the NPT Code Symbol Stamps that are the subject of this alternative request. The two ASME letters provided in Enclosures 3 and 4 are addressed in the response to the NRC staff's question 2 of eRAI 8031 in Enclosure 2 of this letter.

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/NH/ljs



Sworn to and subscribed before me this 17th day of August, 2015

Notary Public: Lisa Myrick Spears

My commission expires: June 18, 2019

- Enclosures: 1) (previously submitted with the original ASME Code alternative request, VEGP 3&4-PSI/ISI-ALT-03, in SNC letter ND-15-0773)
- 2) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Response to Request for Additional Information Regarding Request for Alternative (VEGP-3&4-PSI/ISI-ALT-03S1)
- 3) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Letter from Kevin Ennis (ASME) to Mr. Michael Case (NRC), "ASME NPT Stamp Equivalency," dated August 27, 2014 (VEGP-3&4-PSI/ISI-ALT-03S1)
- 4) Vogtle Electric Generating Plant (VEGP) Units 3 and 4 – Letter from Jon Labrador (ASME) to ASME NPT Certificate Holders Regarding Recall of NPT Code Symbol Stamps, dated June 17, 2015 (VEGP-3&4-PSI/ISI-ALT-03S1)

cc:

Southern Nuclear Operating Company / Georgia Power Company

Mr. S. E. Kuczynski (w/o enclosures)
Mr. J. A. Miller
Mr. D. G. Bost (w/o enclosures)
Mr. M. D. Meier
Mr. M. D. Rauckhorst (w/o enclosures)
Mr. J. T. Gasser (w/o enclosures)
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Ms. K. D. Fili (w/o enclosures)
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Mr. B. H. Whitley
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Mr. L. M. Cain
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Mr. C. D. Churchman (w/o enclosures)
Mr. L. Woodcock
Mr. P. A. Russ
Mr. G. F. Couture
Mr. M. Y. Shaqqo

Other

Mr. J. E. Hesler, Bechtel Power Corporation
Ms. L. A. Matis, 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

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Enclosure 2

(Note that the first Enclosure was provided with the original request for alternative, VEGP 3&4-PSI/ISI-ALT-03, in SNC letter ND-15-0773)

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

**Response to Request for Additional Information
Regarding
Request for Alternative
(VEGP-3&4-PSI/ISI-ALT-03S1)**

(This enclosure contains four pages, including this cover page.)

Electronic Request for Additional Information (eRAI) Tracking No. 8031

NRC Question:

In Southern Nuclear Operating Company letter dated April 27, 2015, for Vogtle Electric Generating Plant, Units 3 and 4, the proposed request for alternative (ADAMS Accession NO. ML15117A444) states that this 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 CFR50.55a(1). However, since this horizontal NPT stamp is not in the 2011 Addenda to the 2010 Edition of ASME B&PV Code, Section III, or any other edition of the ASME Code, the use of this horizontal NPT stamp will not meet the ASME Code, as written.

Therefore, the NRC staff requests the following:

1. Based on the above, any component that has the horizontal NPT stamp will need this request for alternative for the life of the component because the horizontal NPT stamp is not in any Edition or Addenda of the ASME Code. Revise the duration of the request for alternative accordingly.
2. Provide the applicable ASME letter that verifies that the horizontal NPT stamp is equivalent to the N over PT stamp specified in the 2010 Edition and earlier editions of the ASME B&PV Code, Section III.
3. Clarify whether the horizontal NPT stamp will be used in the future.
4. Provide the applicable timeframe that the horizontal NPT stamp may have been used.

SNC Response:

The following supplemental information provides a brief background on ASME “N”-type symbol stamping and certification marking in order to promote a better understanding of the basis for the Code alternative requested by VEGP-3&4-PSI/ISI-ALT-03. This information is followed by the specific responses to the four questions provided by eRAI No. 8031.

Background on ASME “N”-type Symbol Stamping and Certification Marking

Beginning with the 2011 Addenda to the 2010 Edition of the ASME Code, ASME began transitioning from the multiple “N”-type Symbol Stamps (N, NA, NPT, NV and N3) that were required by earlier ASME Code editions to a new, single “Certification Mark.” This was a decision made by ASME to simplify the Code symbol stamp marking process with the additional benefit of reducing costs to ASME associated with worldwide trademarking of the multiple “N”-type Symbol Stamps. ASME Section III Code Case N-822 allowed the use of “N”-type Symbol Stamps through December 31, 2012. Code Case N-822-1 extended the use of the “N”-type Symbol Stamps to December 31, 2014, documented that the “N”-type Symbol Stamp and the Certification Mark are equivalent, and that either the “N”-type Symbol Stamp or the Certification Mark may be used. Code Case N-822-2 extended the use of “N”-type Symbol Stamps to December 31, 2015. Code Case N-822-3, which is currently under ASME review, proposes to extend the use of the “N”-type Symbol Stamps to December 31, 2016. ASME approval of Code Case N-822-3 is expected by the end of this year.



N over PT
Symbol Stamp



Horizontal NPT
Symbol Stamp



NPT
Certification
Mark

Note that the NRC has authorized Southern Nuclear Operating Company (SNC) [ADAMS Accession No. ML12331A309] to apply either the “N”-type Symbol Stamp or the Certification Mark to ASME Code Class 1, 2, and 3 components, parts, appurtenances, and other items for Vogtle Electric Generating Plant (VEGP) Units 3 & 4 until the 2011 Addenda to the 2012 Edition of the ASME Code Section III is incorporated by reference into 10 CFR 50.55a.

RAI Responses

1. Items with the horizontal NPT symbol stamp are being installed in VEGP Units 3 & 4 during initial construction. These items are anticipated to remain in place for their service life. Therefore, the duration of the request for alternative is changed from:

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).

To read:

For the service life of any item stamped with the horizontal ASME NPT symbol stamp installed during VEGP 3 & 4 construction.

2. Enclosure 3 to this letter provides the applicable ASME letter from Kevin Ennis, Director, Nuclear Codes and Standards, ASME to Mr. Michael Case, Director, Division of Engineering, Office of Nuclear Regulatory Research, NRC, “ASME NPT Stamp Equivalency,” dated August 27, 2014.

Enclosure 4 to this letter provides the applicable ASME letter from Jon Labrador, Director, Product Certification and Operations Conformity Assessment Department, ASME to ASME NPT Certificate Holders notifying Certificate Holders of the issue and recalling the horizontal NPT Symbol Stamps in exchange for the N over PT Symbol Stamp, dated June 17, 2015.

3. Based on the background information provided above, SNC expects that items with the horizontal NPT Symbol Stamp will be fabricated between February 2012 and the end of calendar year 2016 (pending ASME approval of Code Case N-822-3). These items will be installed only during the initial construction of VEGP Units 3 & 4.
4. The timeframe that items for Vogtle Units 3 & 4 requiring stamping could have the horizontal NPT Symbol Stamp applied is February 2012 through the end of calendar year 2016 (pending ASME approval of Code Case N-822-3). ASME has determined that procurement of NPT Symbol Stamps with the letters arranged horizontally first began in September 2005. NPT Certificate Holders were issued horizontal NPT symbol stamps by ASME after that date.

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Enclosure 2

SNC Response to Request for Additional Information Related to Request for Alternative
(VEGP-3&4-PSI/ISI-ALT-03S1)

However, items requiring NPT Symbol Stamping for VEGP Units 3 & 4 were stamped after receipt of the VEGP 3 & 4 Combined Licenses in 2012. As noted in the Background section, ASME is reviewing Code Case N-822-3, which will allow use of the "N"-type Symbol Stamp through the end of calendar year 2016, after which Certification Marks must be used.

Southern Nuclear Operating Company

ND-15-1406

Enclosure 3

(Note that the first Enclosure was provided with the original request for alternative, VEGP 3&4-PSI/ISI-ALT-03, in SNC letter ND-15-0773, and Enclosures 2 through 4 are provided in this letter)

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

**Letter from Kevin Ennis (ASME) to Mr. Michael Case (NRC),
“ASME NPT Stamp Equivalency,” dated August 27, 2014
(VEGP-3&4-PSI/ISI-ALT-03S1)**

(This enclosure contains two pages, including this cover page.)



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STANDARDS & CERTIFICATION

August 27, 2014

Mr. Michael Case
Director, Division of Engineering
Office of Nuclear Regulatory Research
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: ASME NPT Stamp Equivalency

Dear Mr. Case,

The American Society of Mechanical Engineers (ASME) has reviewed the issue regarding certain NPT stamps which could be considered non-compliant with the illustration shown in the ASME Boiler and Pressure Vessel Code, Section III, Division 1, Subsection NCA, Table NCA-8100-1, 2010 edition and earlier editions/addenda, and it is the position of ASME that:



is equivalent to



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

Sincerely,

Kevin Ennis
Director, Nuclear Codes and Standards
ASME
2 Park Avenue
New York, NY 10016

CC: Richard McIntyre, Kerri Kavanagh, Ralph Hill, Allyson Byk, Ryan Crane

Southern Nuclear Operating Company

ND-15-1406

Enclosure 4

(Note that the first Enclosure was provided with the original request for alternative, VEGP 3&4-PSI/ISI-ALT-03, in SNC letter ND-15-0773, and Enclosures 2 through 4 are provided in this letter)

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

**Letter from Jon Labrador (ASME) to ASME NPT Certificate Holders
Regarding Recall of NPT Code Symbol Stamps, dated June 17, 2015
(VEGP-3&4-PSI/ISI-ALT-03S1)**

(This enclosure contains two pages, including this cover page.)

June 17, 2015

ASME NPT Certificate Holders,

The American Society of Mechanical Engineers (ASME) has reviewed the issue regarding certain NPT Code Symbol Stamps which could be considered non-compliant with the illustration shown in the ASME Boiler and Pressure Vessel Code, Section III, Division 1, Subsection NCA, Table NCA-8100-1, 2010 Edition and earlier Editions and Addenda. It is the position of ASME that:



is equivalent to



Although these NPT Stamps differ slightly in appearance, they serve the same purpose of certifying Code compliance by the ASME Certificate Holder with verification by the Authorized Nuclear Inspector and provide for the same level of quality assurance. The recently approved Code Case N-852 further confirms 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 and WA-8000.

However, in order to avoid any further confusion in the industry, ASME has decided to recall the NPT Code Symbol Stamps with the NPT letters arranged horizontally. If you have an NPT Code Symbol Stamps with the NPT letters arranged horizontally in your possession, please return it to ASME's Headquarters at Two Park Avenue, New York, NY 10016. The Society will then send you the NPT Code Symbol Stamp as illustrated in Section III, Table NCA-8100-1 of the Boiler and Pressure Vessel Code, 2010 Edition and earlier Editions and Addenda.

Please contact the ASME Conformity Assessment Department via email at ca@asme.org if you have any questions.

Sincerely,



Jon Labrador
Director, Product Certification and Operations
Conformity Assessment Department
American Society of Mechanical Engineers