

October 31, 2019

Docket Nos.: 52-026

ND-19-1294
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 Unit 4
Request for Alternative:
Alternative Requirements for Inservice Test Interval Code Edition, Unit 4
(VEGP 3&4-IST-ALT-01)**

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 10 CFR 50.55a(f)(4)(i) and 10 CFR 50.55a(f)(4)(ii) regarding use of the latest edition and addenda of the ASME Operation and Maintenance of Nuclear Power Plants (OM) Code used in initial and successive inservice test (IST) intervals. The ASME OM Code has the same requirements for establishing the Code Edition for the Initial Inservice Test Interval (in ISTA-3200(f)(2)), and Successive Inservice Test Intervals (in ISTA-3200(f)(3)). The proposed request for alternative would establish initial and successive Vogtle Unit 4 IST intervals concurrent with the associated initial and successive Vogtle Unit 3 IST intervals. IST plans for each interval will be combined into a single plan for both units.

The details of the 10 CFR 50.55a(z)(1) request are contained in Enclosure 1 to this letter. Enclosure 2 provides the associated licensing basis markups.

Approval is requested by April 30, 2020 to support finalization of the Unit 4 Inservice Testing Program 12 months prior to Unit 4 fuel load. SNC expects to implement the changes afforded by this alternative 12 months prior to Unit 4 fuel load.

This letter contains no regulatory commitments. This letter has been reviewed and confirmed to contain no security-related information. Should you have any questions, please contact Mr. Adam Quarles at (205) 992-7031.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 31st day of October 2019.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

A handwritten signature in black ink, appearing to read "B. H. Whitley", is written over a horizontal line.

Brian H. Whitley
Director, Regulatory Affairs
Southern Nuclear Operating Company

- Enclosure 1: Request for Alternative:
Alternative Requirements for Inservice Test Interval Code Edition, Unit 4
(VEGP 3&4-IST-ALT-01)
- Enclosure 2: Proposed Licensing Basis Markups:
Alternative Requirements for Inservice Test Interval Code Edition, Unit 4
(VEGP 3&4-IST-ALT-01)

cc:

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Enclosure 1

Vogtle Electric Generating Plant (VEGP) Unit 4

**Request for Alternative:
Alternative Requirements for Inservice Test Interval Code Edition, Unit 4
(VEGP 3&4-IST-ALT-01)**

(This enclosure consists of 4 pages, including this cover page.)

Plant Site-Unit:	Vogtle Electric Generating Plant (VEGP) – Unit 4
Interval-Interval Dates:	Applies to the all inservice test (IST) intervals for Unit 4.
Requested Date for Approval:	Authorization is requested by April 30, 2020.
ASME Code Components Affected:	All components in the IST program.
Applicable Code Edition and Addenda:	ASME Operation and Maintenance of Nuclear Power Plants (OM) Code, 2012 Edition for 1 st Inservice Test Interval.
Applicable Code Requirements:	<p>10 CFR 50.55a(f)(4)(i) requires the ASME OM Code edition and addenda for the initial IST interval be the latest edition and addenda incorporated by reference in 10 CFR 50.55a(a)(1)(iv) 12 months before the date scheduled for initial loading of fuel under a combined license under 10 CFR part 52.</p> <p>10 CFR 50.55a(f)(4)(ii) requires that the ASME OM Code edition and addenda for successive IST intervals be that incorporated by reference in paragraph 10 CFR 50.55a(a)(1)(iv) 12 months before the start of the 120-month interval.</p> <p>The OM Code, ISTA-3200 has the same requirements for establishing the Code Edition for the Initial Inservice Test Interval (in ISTA-3200(f)(2)), and Successive Inservice Test Intervals (in ISTA-3200(f)(3)).</p>
Reason for Request:	With a one year gap between the scheduled fuel loadings (and subsequent IST intervals) of Vogtle Unit 3 and Unit 4, there is the possibility that the Code Edition required for the Inservice Test program plan will be different between the two units. Because the two units are nearly identical, the Combined License application was for both units, and both units share a common UFSAR, it would create inconsistencies between the two units that would increase the complexity of the UFSAR

	<p>and testing programs that would increase the probability of human error in implementing and maintaining two different programs.</p> <p>To minimize the problems of maintaining two separate IST Programs, it would be preferable to have both IST Programs be developed to the Code Edition and Addenda required for the lead unit (Unit 3).</p> <p>Based on the current scheduled initial loading of fuel for Unit 3 being November 23, 2020, and the current schedule for addition of ASME OM Code Editions to 10 CFR 50.55a being late February 2020, the current latest edition of the OM Code listed in 10 CFR 50.55a (2012 Edition) would be used for establishing the initial 120-month interval IST Programs for Vogtle 3 & 4.</p>
<p>Proposed Alternative and Basis for Use:</p>	<p>Proposed Alternative:</p> <p>In lieu of the requirements of 10 CFR 50.55a(f)(4)(i), for establishing the ASME OM Code edition and addenda for the initial Inservice Test interval, or 10 CFR 50.55a(f)(4)(ii) for establishing the ASME OM Code edition and addenda for subsequent inservice test intervals, and the equivalent requirements in ISTA-3200(f)(2) & (3), it is proposed that the Code Edition for each Unit 4 IST Interval be the same edition and/or addenda as established for the associated Unit 3 Interval (which will be established in accordance with 10 CFR 50.55a(f)(4)(i) or (ii)). Inservice Test Plans for each Interval will be combined into a single plan for both Units.</p> <p>Basis for Use:</p> <p>Maintaining both units on the same interval schedule allows both IST programs to be developed utilizing the same edition of the applicable Codes, which will make it less complicated for involved personnel to become familiar with the Code requirements, will ensure a greater degree of consistency for IST between the units, and will reduce the effort associated with surveillance procedure revisions for the program update and for maintenance of the program documents.</p> <p>The Code of Record established for Unit 3 is in accordance with the 10 CFR 50.55a requirements and represents requirements established by the NRC to ensure the equipment is adequately tested to ensure safe plant operation. Applying a common Code edition to both Unit 3 and Unit 4 would establish common requirements which would minimize potential errors caused by having to maintain two separate program requirements for the 2 units. Additionally, based on the version of the Code anticipated for Unit 3 IST program, the units will use the same Code Edition as that used for Preservice testing, which will ensure consistency of Preservice to Inservice testing.</p> <p>Per NUREG-1482, Rev. 2, Basis for 3.3.2, Concurrent Intervals states "The staff believes that conducting IST programs for multiple unit sites</p>

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Enclosure 1

Request for Alternative:

Alternative Requirements for Inservice Test Interval Code Edition, Unit 4
(VEGP 3&4-IST-Alt-01)

	<p>using the same Code edition could provide an improvement in program effectiveness.”</p> <p>Based on the above, the proposed alternative provides an equivalent level of quality and safety in accordance with 10 CFR 50.55a(z)(1).</p>
Duration of Proposed Alternative:	Life of the plant.
References:	<ol style="list-style-type: none">1. Vogtle 1 & 2 General Relief Request RR-G-2 (Legacy Accession Number 9608200192).2. NRC Approval letter for RR-G-1 & RR-G-2, dated 11/27/1996 (Legacy Accession Number 9612020101)3. NUREG-1482, Rev. 2, Section 3.3.2, Concurrent Intervals.
Status:	Awaiting NRC authorization

Southern Nuclear Operating Company

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Enclosure 2

Vogtle Electric Generating Plant (VEGP) Unit 4

**Proposed Licensing Basis Markups:
Alternative Requirements for Inservice Test Interval Code Edition, Unit 4
(VEGP 3&4-IST-ALT-01)**

Insertions noted by blue underline

* * * Denotes omitted material

(This enclosure consists of 2 pages, including this cover page.)

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Enclosure 2

Proposed Licensing Basis Markups:

Alternative Requirements for Inservice Test Interval Code Edition, Unit 4
(VEGP 3&4-IST-Alt-01)

Revise UFSAR Subsections 3.9.3.4.4 and 3.9.6 to specify that the initial inservice testing program incorporates the edition and addenda of the ASME OM Code as follows:

3.9.3.4.4 Inspection, Testing, Repair, and/or Replacement of Snubbers

* * *

b. Snubber Installation Requirements

* * *

The initial inservice testing program incorporates the latest edition and addenda of the ASME OM Code approved in 10 CFR 50.55a(f) on the date 12 months before initial [Unit 3](#) fuel load. Limitations and modifications set forth in 10 CFR 50.55a are incorporated.

* * *

3.9.6 Inservice Testing of Pumps and Valves

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The initial inservice testing program incorporates the latest edition and addenda of the ASME OM Code approved in 10 CFR 50.55a(f) on the date 12 months before [Unit 3](#) initial fuel load.

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