Southern Nuclear

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Docket Nos.: 52-026

ND-20-0083
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
Revision to Request for Alternative:
Alternative Requirements for Inservice Test Interval Code Edition, Unit 4
(VEGP 3&4-IST-ALT-01R1)

Ladies and Gentlemen:

Pursuant to 10 CFR 50.55a(z)(1), Southern Nuclear Operating Company (SNC) requested 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 by SNC letter ND-19-1294, dated October 31, 2019 [ADAMS Accession Number ML19304C432]. 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.

As a result of discussions held with NRC Staff during the January 23, 2020 public meeting, SNC is changing the request for alternative to be applicable to the initial Unit 4 IST interval only.

The details of the 10 CFR 50.55a(z)(1) request were contained in Enclosure 1 of letter ND-19-1294. Enclosure 3 to this letter is a revision and replacement of Enclosure 1 of letter ND-19-1294; revisions are indicated by revision bars in the right margin.

Enclosure 2 of letter ND-1294 included the licensing basis markups and is not revised by this letter.

SNC maintains its requested approval date of 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 6th day of February 2020.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

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

Enclosures 1 and 2: Provided previously in ND-19-1294

Enclosure 3: Revision to Request for Alternative: Alternative Requirements for Inservice Test Interval Code Edition, Unit 4 (VEGP 3&4-IST-ALT-01R1)

cc:

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Southern Nuclear Operating Company

ND-20-0083
Enclosure 3

Vogtle Electric Generating Plant (VEGP) Unit 4

Revision to Request for Alternative:
Alternative Requirements for Inservice Test Interval Code Edition, Unit 4
(VEGP 3&4-IST-ALT-01R1)

Note: Enclosure 3 revises and completely replaces Enclosure 1.
Revision bars in right margin indicate where Enclosure 3 has revised Enclosure 1.

(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 initial inservice test (IST) interval 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 1st Inservice Test Interval.
Applicable Code Requirements:	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. 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)).
Reason for Request:	With a one year gap between the scheduled fuel loadings 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 and testing programs that would increase the probability of human error in developing and implementing two different programs. To minimize the problems of developing and implementing 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). 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.
Proposed Alternative and Basis for Use:	**Proposed Alternative:** 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, and the equivalent requirements in ISTA-3200(f)(2), it is proposed that the Code Edition for the initial Unit 4 IST Interval be the same edition and/or addenda as established for the associated initial Unit 3 Interval (which will be established in accordance with 10 CFR 50.55a(f)(4)(i)). **Basis for Use:** Having both units on the same Code Edition for their initial intervals 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. 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. Per NUREG-1482, Rev. 2, Basis for 3.3.2, Concurrent Intervals states “The staff believes that conducting IST programs for multiple unit sites using the same Code edition could provide an improvement in program effectiveness.” Based on the above, the proposed alternative provides an equivalent level of quality and safety in accordance with 10 CFR 50.55a(z)(1).

Duration of Proposed Alternative:	Through the end of the first Vogtle Unit 4 IST interval.
References:	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