Georgia Power Company
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201
Telephone 205 877-7122

C. K. McCoy
Vice President, Nuclear
Vogtle Project

Georgia Power
the southern electric system

June 1, 1995

LCV-0567

Docket Nos.: 50-424,
50-425

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

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
RADIOGRAPHIC FILM PROJECT

Beginning in Spring 1993 and continuing through the middle of December 1994, a radiographic (RT) film project was conducted at Georgia Power Company (GPC), Vogtle Electric Generating Plant, Units 1 and 2 (VEGP-1 and 2). The project was conducted with the intent of locating and organizing the RT film for welds in the inservice inspection (ISI) programs for VEGP-1 and 2. Those particular welds were termed "critical" and were welds which were volumetrically examined during either preservice and/or inservice inspection activities. Benefits from the RT film project included the following:

- Organization of RT film (including indexing of the "critical" RT film, interleaving of the film with acid-free paper, and transfer to archival quality, acid-free boxes),

- Plant Records management would be aware of any deterioration problems concerning the "critical" RT film in the vault, and

- Providing immediate access to RT film required to evaluate any reportable volumetric examination indications which might be observed during maintenance/refueling outages or any other time, thus eliminating potential critical path time searching for the RT film.

In addition to indexing the "critical" RT film, a deterioration evaluation of the subject RT film was performed.

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Generally speaking, the effort to locate and organize the "critical" RT film for VEGP-1 and 2 was successful. Approximately 75,000 pieces of "critical" RT film were indexed. Slightly over ninety-eight percent of the RT film or reader sheets for the "critical" film was located. Although the RT film project was generally considered to be successful, neither the RT film nor the RT film reader sheets for twenty-three (23) ASME Code Class 1 and 2 welds which we termed to be "critical" were able to be located during this effort. In addition, only the RT film reader sheets were able to be located for twenty (20) other "critical" welds whose RT film could not be located. It should be noted that Article NA-4000 of the versions of ASME Section III to which the components at VEGP-1 and 2 were constructed, i.e., the 1971 or 1974 version dependent upon the component involved, requires that all RT film be retained. However, over the years ASME Section III was revised and now requires that only RT film be retained for those components as specified by the plant owner in the plant's inservice inspection program (ref.: Table NCA-4134.17-1 of ASME Section III, 1989 Edition). Enclosure 1 to this letter identifies the 23 "critical" welds having either outstanding RT film or RT film reader sheets. Enclosure 2 identifies the 20 "critical" welds without RT film where only the RT film reader sheets were located.

While the "critical" welds without RT film might be able to be re-radiographed, this is not deemed practical for several reasons. First, the affected welds have been inservice and, obviously, are no longer in a "preservice" state. Second, any new RT performed would require a different technique for performing the radiograph, i.e., a "double wall shot" since the component's interior is not accessible vice a "single wall shot" where the component's interior is accessible such as during the original plant construction. Regardless of the reasons cited above, an unfair comparison would result were the welds to be re-radiographed. Although RT film and/or RT film reader sheets have not been located for the affected "critical" welds, volumetric examination data, i.e., ultrasonic examination data, taken during either preservice and/or inservice inspection activities exists for the welds in question.

It is our belief that the outstanding RT film or RT film reader sheets for the "critical" welds are neither a question of quality nor safety but is one of recordkeeping. As a result, no special efforts will be made to locate the outstanding RT film or RT film reader sheets for the affected "critical" welds except for those efforts expended during normal day-to-day operation. GPC is submitting this correspondence to the NRC strictly for informational purposes and no action is being requested of the NRC as a result.

Georgia Power

Should there be any questions in this regard, please contact this office at your earliest convenience.

Sincerely,

C. K. McCoy

CKM/JAE/jae

Enclosures: 1. List of VEGP-1 and 2 Piping/Component "Critical" Welds Without Either RT Film or RT Film Reader Sheets
2. List of VEGP-1 and 2 Piping "Critical" Welds Without RT Film Where Only RT Reader Sheets Were Located

xc: Georgia Power Company
Mr. J. B. Beasley, Jr.
Mr. W. L. Burmeister
Mr. M. Sheibani
NORMS

U. S. Nuclear Regulatory Commission
Mr. S. D. Ebneter, Regional Administrator
Mr. D. S. Hood, Licensing Project Manager, NRR
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

ENCLOSURE 1
TO
GEORGIA POWER COMPANY LETTER
LCV-0567,
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The following are the twenty-three (23) Vogtle Electric Generating Plant, Units 1 and 2 (VEGP-1, VEGP-2) "critical" welds where neither the RT film nor RT film reader sheets have been located:

VEGP-1

ISI Weld No.	Weld Description	ASME Code Class	Plant System
11201-V6-002-W16	Pressurizer 14" Surge Nozzle-to-Shell Weld	1	Reactor Coolant System (RCS)
11201-002-2	6" Branch Connection Weld	1	RCS
11201-002-3	29" Pipe-to-Elbow Weld	1	RCS
11201-003-3	29" Pipe-to-Elbow Weld	1	RCS
11201-B6-004-W26	Steam Generator 6" Auxiliary Feedwater Nozzle-to-Shell Weld	2	RCS
11208-E6-001-W02	Regenerative Heat Exchanger (Regen Hx) Tube Sheet-to-Shell Weld	2	Chemical and Volume Control System (CVCS)
11208-E6-001-W04	Regen Hx Reinforcing Collar-to-Main Shell Weld	2	CVCS

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VEGP-1 (continued)

ISI Weld No.	Weld Description	ASME Code Class	Plant System
11208-E6-001-W07	Regen Hx Main Shell-to-Reinforcing Collar Weld	2	CVCS
11208-E6-007-W03	Letdown Reheat Heat Exchanger (Hx) Vessel Flange-to-Vessel Shell Weld	2	CVCS
11208-E6-007-W06	Letdown Reheat Hx Vessel Head-to-Vessel Shell Weld	2	CVCS
11208-V4-002-W01	Discharge Dampener Hemi-Head-to-Hemi-Head Weld	2	CVCS
11204-039-2	8" Pipe-to-Elbow Weld	2	Safety Injection (SI) System
11204-039-58	6" Pipe-to-Valve Weld	2	SI
11204-197-1	4" Valve-to-Pipe Weld	2	SI

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VEGP-1 (continued)

ISI Weld No.	Weld Description	ASME Code Class	Plant System
11302-107-8	6" Pipe-to-Valve Weld	2	Auxiliary Feedwater (AFW) System
11302-109-13	Penetration-to-6" Pipe Weld	2	AFW
11305-060-23	16" Pipe-to-Nozzle Weld	2	Condensate and Feedwater System

TOTAL NUMBER OF VEGP-1 "CRITICAL" WELDS WITHOUT EITHER RT FILM OR RT FILM READER SHEETS: 17 (CLASS 1: 4 WELDS, CLASS 2: 13 WELDS).

VEGP-2

ISI Weld No.	Weld Description	ASME Code Class	Plant System
21208-E6-001-W04	Regen Hx Reinforcing Collar-to-Main Shell Weld	2	CVCS
21208-E6-001-W07	Regen Hx Main Shell-to-Reinforcing Collar Weld	2	CVCS
21208-E6-007-W03	Letdown Reheat Hx Vessel Flange-to-Vessel Shell Weld	2	CVCS

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VEGP-2 (continued)

ISI Weld No.	Weld Description	ASME Code Class	Plant System
21208-007-W06	Letdown Reheat Hx Vessel Head-to-Vessel Shell Weld	2	CVCS
21208-V4-001-W01	Suction Dampener Vessel Head-to-Vessel Shell Weld	2	CVCS
21208-V4-001-W02	Suction Dampener Vessel Shell-to-Vessel Head Weld	2	CVCS

TOTAL NUMBER OF VEGP-2 "CRITICAL" WELDS WITHOUT EITHER RT FILM OR RT FILM READER SHEETS: 6 (CLASS 1: 0, CLASS 2: 6).

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The following are the twenty (20) Vogtle Electric Generating Plant, Units 1 and 2 (VEGP-1, VEGP-2) "critical" welds without RT film where only the RT film reader sheets were able to be located:

VEGP-1

ISI Weld No.	Weld Description	ASME Code Class	Plant System
11204-020-07A	8" Pipe-to-Pipe Weld	2	Safety Injection (SI) System
11204-025-13	6" Reducer-to-Pipe Weld	1	SI
11204-025-14	6" Pipe-to-Elbow Weld	1	SI
11204-025-15	6" Elbow-to-Pipe Weld	1	SI
11204-025-16	6" Pipe-to-Elbow Weld	1	SI
11204-025-17	6" Elbow-to-Pipe Weld	1	SI
11204-039-22	8" Pipe-to-Elbow Weld	2	SI
11208-145-16	4" Pipe-to-Valve Weld	2*	Chemical and Volume Control System (CVCS)

* Augmented examination.

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(continued)

VEGP-1 (continued)

TOTAL NUMBER OF VEGP-1 "CRITICAL" WELDS WITHOUT RT FILM WHERE ONLY THE RT FILM READER SHEETS WERE ABLE TO BE LOCATED: 8 (CLASS 1: 5, CLASS 2: 2, CLASS 2 AUGMENTED: 1).

VEGP-2

ISI Weld No.	Weld Description	ASME Code Class	Plant System
21201-029-32	4" Pipe-to-Elbow Weld	1	Reactor Coolant System (RCS)
21202-218-17	6" Pipe-to-Elbow Weld	2*	Nuclear Service Cooling Water (NSCW) System
21202-218-18	6" Elbow-to-Pipe Weld	2*	NSCW
21202-218-19	6" Pipe-to-Flange Weld	2*	NSCW
21204-006-54	24" Pipe-to-Elbow Weld	2*	Safety Injection (SI) System
21204-006-55	24" Elbow-to-Pipe Weld	2*	SI
21204-127-7	10" Pipe-to-Valve Weld	1	SI

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VEGP-2 (continued)

ISI Weld No.	Weld Description	ASME Code Class	Plant System
21205-003-27	14" Pipe-to-Tee Weld	2*	Residual Heat Removal (RHR) System
21208-022-29C	3" Swage-to-Pipe Weld	2*	CVCS
21208-023-37	2" Pipe-to-Elbow Weld	2*	CVCS
21301-003-11	Valve-to-29-1/2" Pipe Weld	2	Main Steam (MS) System
21301-107-13	Penetration-to-6" Pipe Weld	2	MS

* Augmented examination.

TOTAL NUMBER OF VEGP-2 "CRITICAL" WELDS WITHOUT RT FILM WHERE ONLY THE RT FILM READER SHEETS WERE ABLE TO BE LOCATED: 12 (CLASS 1: 2, CLASS 2: 2, CLASS 2 AUGMENTED: 8).