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Vice President, Nuclear
Vogtle Project



January 22, 1996

LCV-0668

Docket No.: 50-425

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

Gentlemen:

**VOGTLE ELECTRIC GENERATING PLANT
REVISION 7 TO INSERVICE INSPECTION PROGRAM**

In accordance with the requirements of Technical Specification 4.0.5 concerning surveillance requirements, Georgia Power Company (GPC) submits for review and approval ten copies of Revision 7 to the inservice inspection (ISI) program for Vogtle Electric Generating Plant, Unit 2 (VEGP-2). The enclosure provides Revision 7 to VEGP-2 ISI Program document ISI-P-014. The ISI program currently in effect was written to the requirements of Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, 1983 Edition with Addenda through Summer 1983 except where relief has been granted by the NRC. The enclosed document supersedes portions of the original ISI program document previously submitted to the NRC.

The Revision 7 changes to the VEGP-2 ISI Program include the following:

- Modification of existing Relief Requests RR-22, RR-23, RR-24, RR-26, RR-29, RR-30, and RR-43,
- Addition of new Relief Requests RR-58, RR-59, RR-60, RR-61, and RR-62, and
- Minor editorial changes.

Existing Relief Request RR-22, which was previously approved by the NRC, was modified to delete a sentence in its "Basis for Relief" section in order to provide a clarification to the relief request. The change to Relief Request RR-22 does not change the intent of the original relief request.

Existing Relief Request RR-23, which was previously approved by the NRC, was revised

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to correct the wall thickness listings of the elbow fittings shown in the original relief request. The relief request is being revised in response to Unresolved Item (URI) 50-424/94-24-02 as identified by NRC Region II in NRC Inspection Report 50-424/94-24 and 50-425/94-24. It should be noted that the subject relief request will not be utilized beginning with the third period of the current ten-year ISI interval for reasons discussed in the "Implementation Schedule" section of the relief request. The changes to Relief Request RR-23 do not change the intent of the original relief request.

Existing Relief Request RR-24, which was previously approved by the NRC, was revised to include three additional welds which have examination coverage limitations. A full Code examination is not possible since the ultrasonic examination coverage for Reactor Coolant System welds 21201-005-8, 21201-008-8, and 21201-011-1 was limited to ninety (90), 90, and seventy-five (75) percent, respectively, for the three welds. Full Code-examination coverage is considered to be 90 percent or greater. Although welds 21201-005-8 and 21201-008-8 meet that criteria, they are being added to the relief request for the sake of consistency. The changes to Relief Request RR-24 do not change the intent of the original relief request.

Existing Relief Request RR-26, which was previously approved by the NRC, was revised to correct the weld description for Safety Injection System weld 21204-127-12 and its percentage of examination coverage attained during preservice inspection activities. The changes to Relief Request RR-26 do not change the intent of the original relief request.

Existing Relief Request RR-29, which was previously approved by the NRC, was revised to include two additional welds which have examination coverage limitations and to correct the weld description for a third weld. A full Code examination is not possible since the ultrasonic examination coverage for Reactor Coolant System welds 21201-B6-001-W18 and 21201-B6-002-W19 was limited to fifty (50) percent examination coverage each. Full Code-examination coverage is considered to be 90 percent or greater. The weld description for Reactor Coolant System weld 21201-B6-003-W05 was changed. The changes to Relief Request RR-29 do not change the intent of the original relief request.

Existing Relief Request RR-30, which was previously approved by the NRC, was revised to include two additional welds which have examination coverage limitations. A full Code examination is not possible since the ultrasonic examination coverage for the Chemical and

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Volume Control System centrifugal charging pump support bracket welds 21208-P6-002-W03 and W05 is limited to seventy (70) percent examination coverage each. Full Code-examination coverage is considered to be 90 percent or greater. The changes to Relief Request RR-30 do not change the intent of the original relief request.

Existing Relief Request RR-43, which was previously approved by the NRC, was revised to address where the snubber testing program will be documented as a result of the on-going industry Improved Technical Specifications Program. The snubber testing program is being removed from the Technical Specifications for VEGP and being relocated to a licensee-controlled document such as the Updated Final Safety Analysis Report, Technical Requirements Manual, etc. This relocation is allowed by the NRC Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors as noticed in the Federal Register 58 FR 39132 dated July 22, 1993. The snubber testing program remains unchanged except for the location where it is documented.

Relief Request RR-58 was previously submitted to the NRC by GPC letter LCV-0440 dated October 28, 1994 for review and approval. The relief request concerned repairs made to the upper east secondary manway cover on steam generator 21201-B6-001 during VEGP-2 Maintenance/Refueling Outage 2R3 in Fall 1993. Approval of Relief Request RR-58 was granted by the NRC and documented in its April 26, 1995 letter to GPC. No additional action is requested of the NRC concerning this relief request. Relief Request RR-58 is included herein in order to formally incorporate it into Revision 7 of VEGP-2 ISI Program document ISI-P-014 and to maintain the document current.

Relief Request RR-59 requests approval for the use of ASME Code Case N-416-1, "Alternative Pressure Test Requirement for Welded Repairs or Installation of Replacement Items by Welding Class 1, 2, and 3, Section XI, Division 1". Use of the code case would allow for an alternative test in lieu of performing the hydrostatic pressure test after welded repairs or installation of replacement items by welding. In addition to the alternative rules of ASME Code Case N-416-1, GPC proposes to augment the alternative tests delineated in the code case by performing an additional surface examination on the root pass layer of butt and socket welds on the pressure-retaining boundary of Class 3 components.

Relief Request RR-60 requests approval for the use of ASME Code Case N-498-1, "Alternative Rules for 10-Year System Hydrostatic Testing for Class 1, 2, and 3 Systems".

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Use of the code case would allow for an alternative test in lieu of performing the 10-year hydrostatic test required by ASME Section XI and could result in reduced personnel radiation dose, outage time, and costs. The alternative rules require that a pressure test be performed at nominal operating pressure.

Relief Request RR-61 requests approval for the use of ASME Code Case N-509, "Alternative Rules for the Selection and Examination of Class 1, 2, and 3 Integrally Welded Attachments, Section XI, Division 1". Use of the alternative sampling plan delineated in the code case in lieu of the examination requirements of ASME Section XI for integrally welded attachments could result in reduced personnel radiation dose, outage time, and costs. Specifically, ASME Code Case N-509 would allow for the examination of Class 1 and 2 integrally welded attachments using surface techniques, e.g., magnetic particle or dye penetrant methods, while those in Class 3 would receive a visual examination.

Relief Request RR-62 requests that selected Class 2 components, primarily heat exchangers, which are connected to piping 4" nominal pipe size and smaller, be excluded from the surface and volumetric examination requirements of ASME Section XI, IWC-2500. The selected Class 2 components are allowed to be exempted by IWC-1220 beginning with the 1989 addenda to ASME Section XI. These exemptions have been maintained through the 1992 edition of ASME Section XI. The examinations of the components in question are impractical and do not provide a compensating increase in the level of safety and quality were they to be imposed. Approval of the relief request would result in a reduction of personnel radiation dose thereby keeping with the principle of ALARA ("As Low As Reasonably Achievable") with respect to radiation dose. The remaining ASME Section XI-required examination, i.e., pressure tests, assure that an acceptable level of safety and quality is maintained for the applicable Class 2 components.

The remaining changes in Revision 7 to the VEGP-2 ISI Program are editorial in nature. Incorporation of the editorial changes does not change the intent and scope of the ISI Program for VEGP-2.

Please refer to the enclosed ISI program revision for details on the changes described above. A summary of the changes resulting from Revision 7 to the VEGP-2 ISI Program is provided in the enclosure and precedes the affected document pages.

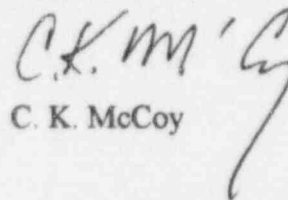
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The NRC is requested to review and grant approval of the enclosed ISI program revision in accordance with 10 CFR 50.55a (g) (6) (i). The subject changes do not affect public health and safety.

The NRC is requested to grant GPC interim approval of Relief Requests RR-59, RR-60, RR-61, and RR-62 by May 31, 1996 pending NRC's full review and approval. In addition to supporting ISI activities to be conducted during VEGP-2 Maintenance/Refueling Outage 2R5 which is scheduled to begin September 15, 1996, use of the aforementioned relief requests offers GPC substantial cost savings over the remaining life of the plant. The use of ASME Code Cases N-416-1, N-498-1, and N-509 as detailed in Relief Requests RR-59, RR-60, and RR-61, respectively, and other changes in the ASME Section XI Code, as detailed in Relief Request RR-62, collectively offer GPC cost savings well in excess of \$425,000 over the remaining life of VEGP-2. As a result, the changes to the ISI Program proposed through these particular relief requests constitute a cost-beneficial licensing action (CBLA)/burden reduction. Such estimated savings do not reflect additional cost savings due to reductions in critical path time and radiation dose. GPC requests full review and approval be granted by July 31, 1996.

Should there be any questions in this regard, please contact this office.

Sincerely,


C. K. McCoy

CKM/JAE/jae

Enclosure: Revision 7 to VEGP-2 ISI Program document ISI-P-014

xc: (see next page for distribution)

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