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LCV-0861

Docket Nos.: 50-424,  
50-425

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

Ladies and Gentlemen:

**VOGTLE ELECTRIC GENERATING PLANT  
UPDATE OF ISI AND IST PROGRAMS**

In accordance with the requirements of 10 CFR 50.55a, Georgia Power Company (GPC) will be updating its inservice inspection (ISI) and inservice testing (IST) programs for Vogtle Electric Generating Plant, Unit 1 (VEGP-1) in 1996 for its second ten-year interval of commercial operation which commences June 1, 1997. The update of the ISI and IST programs for the second ten-year interval of commercial operation at our Unit 2 (VEGP-2) would not be required until May 20, 1999.

Because there are benefits in conducting the ISI and IST programs for VEGP-1 and 2 to the same edition and/or addenda of Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, GPC requests NRC concurrence to update the VEGP-2 ISI and IST programs for the second ten-year interval approximately two years ahead of schedule. The early update of the VEGP-2 ISI and IST programs would be coincident with the update for VEGP-1 and would allow the ISI and IST programs for the two VEGP units to be conducted to the same edition and/or addenda of the Code. Otherwise, a different edition and/or addenda of the Code would have to be used for the ISI and IST programs for each VEGP unit because of the difference in the commercial operation dates on which the ISI and IST program dates are based. By concurrently updating the VEGP-1 and 2 ISI and IST programs, a more comprehensive examination will be achieved which will enhance the possibility of detecting a generic problem and will also reduce costs involved with maintaining two separate ISI and IST programs should the use of different Codes be required. In addition, use of the same edition and/or addenda of the Code for the two units would help prevent possible errors associated with maintaining two programs with different requirements should the early

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update not be allowed. The remaining examinations for the final two years of the current interval for the VEGP-2 ISI program will be rescheduled for the first two years of the new ten-year interval which would commence June 1, 1997. This would ensure that the examinations would be performed at the same point in time as they normally would have been. The IST programs for VEGP-1 and 2 would not be adversely affected by the early update since pump and valve testing is typically performed during plant operation. The practice of concurrent ISI and IST program updates has been used at GPC since 1985 with the updates of the ISI and IST programs at our Hatch Nuclear Plant, Units 1 and 2, for the second interval and most recently for the third ten-year interval of commercial operation. Contingent upon NRC concurrence with the early update of the VEGP-2 ISI and IST programs, we will formally request relief from the requirements of 10 CFR 50.55a to update those programs at their normal update time in the appropriate ISI and IST Programs which we currently plan to submit to the NRC before June 1, 1997.

For the second ten-year interval of commercial operation, the ISI programs for VEGP-1 and 2 will be updated to the 1989 edition of ASME Section XI which is the version of the Code currently approved by the NRC for use as addressed in 10 CFR 50.55a(b)(2). Where the requirements of that edition of ASME Section XI cannot be met, relief will be requested from the NRC through the formal relief request process addressed in 10 CFR 50.55a. Any such relief requests will be submitted to the NRC in the updated ISI programs for the two VEGP units.

For the second ten-year interval of commercial operation, GPC requests NRC concurrence to update the IST programs for VEGP-1 and 2 to a version of the Code other than that currently specified in 10 CFR 50.55a. Currently, 10 CFR 50.55a(b)(2)(viii) endorses the use of Parts 6 and 10 of the OMa-1988 addenda to the 1987 edition of the ASME Operations and Maintenance (OM) Code for the inservice testing of pumps and valves, respectively. GPC intends to use the 1990 edition of the ASME OM Code for pump and valve testing, except for safety relief valves which we plan to test to the requirements of Appendix I of the 1995 edition of the ASME OM Code. In addition, GPC intends to use the guidance included in NRC NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants", to develop the updated IST programs. Where the requirements of the 1990 and 1995 editions of the ASME OM Code for testing as discussed herein cannot be met, relief will be requested from the NRC through the formal relief request process addressed in 10 CFR 50.55a. Any such relief requests will be submitted to the NRC in the updated IST programs for the two VEGP units.

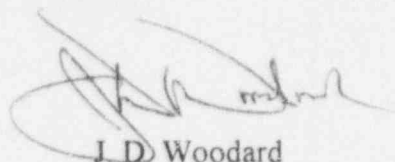
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No changes in the VEGP Technical Specifications are expected in order to implement the ISI and IST programs for VEGP-1 and 2 when they are updated to the later Code editions.

Georgia Power Company requests NRC concurrence with our plans for the Second Ten-Year Interval ISI and IST program updates for VEGP-1 and 2. The early updates for the VEGP-2 ISI and IST Programs will be documented in formal relief requests as part of the ISI and IST Program submittals. The use of the 1990 and 1995 editions of the ASME OM Code as discussed herein for the IST Program will also be documented in a formal relief request as part of the IST Program submittal. NRC concurrence with our plans for updating the VEGP-1 and 2 ISI and IST Programs is requested by December 1, 1996.

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

Sincerely,



J. D. Woodard

JDW/JAE/KLG/jae

xc: Georgia Power Company  
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