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February 17, 1997

LCV-0968

Docket Nos.: 50-424,
50-425

U. S. Nuclear Regulatory Commission
ATTN: Public Document Room
Washington, D. C. 20555

Ladies and Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
IMPLEMENTATION OF CONTAINMENT INSPECTION RULE
REQUEST FOR ALTERNATIVE RULES

By *Federal Register* Notice 154 (Volume 61) dated August 8, 1996, the Nuclear Regulatory Commission (NRC) amended 10 CFR 50.55a to incorporate by reference the 1992 edition with 1992 addenda of Subsections IWE and IWL of Section XI, Division 1, of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code. The effective date for the amended rule was September 9, 1996. An expedited implementation schedule required licensees to incorporate the new requirements into their inservice inspection plans and to complete the first containment inspections within five years (September 9, 2001) of the effective date of the rule.

Georgia Power Company (GPC) interpreted the September 9, 2001 implementation date to include the IWE/IWL repair/replacement provisions into the existing ASME Class 1, 2, and 3 repair/replacement program for Vogtle Electric Generating Plant (VEGP), Units 1 and 2. Our intent was to include this work as part of the 10-year update of the inservice inspection (ISI) and inservice testing (IST) programs which are due May 31, 1997. As result of an NRC letter dated November 6, 1996 to the Nuclear Energy Institute (NEI), we were made aware of the NRC position that the repair/replacement rules of ASME Section XI, Subsections IWE and IWL were to be implemented on September 9, 1996 rather than in conjunction with the first set of containment inspections.

In its November 6, 1996 letter to NEI, the NRC recognized the impracticality of requiring immediate compliance with the new rules and thus recognized the need for a period of

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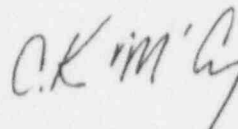
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time for licensees to develop and implement procedures for repairs and replacements which meet the requirements of ASME Section XI, Subsections IWE and IWL. In accordance with the provisions of 10 CFR 50.55a(a)(3)(i), GPC hereby requests relief from the requirements of 10 CFR 50.55a(g)(4)(v) (as identified in 61 *Federal Register* 41303) for a period of one (1) year retroactive to the effective date of the rulemaking. GPC requests that the NRC grant relief until September 9, 1997 to approximately coincide with the beginning of VEGP-1 Maintenance/Refueling Outage 1R7 for compliance with the rule as it is related to the implementation of repair and replacement activities which comply with the 1992 Edition of ASME Section XI, with Addenda through 1992, for Class MC (metal containments) and CC (concrete containments) for Subsections IWE and IWL, respectively.

The containment structures for the two VEGP units are subjected to the testing of 10 CFR 50, Appendix J, and are included in the scope of the NRC Maintenance Rule. There have been no significant events which would indicate any safety concern over their structural integrity or their ability to perform their intended safety function. As a result, the proposed alternative discussed herein provides an acceptable level of quality and safety for VEGP.

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

Sincerely,


C. K. McCoy

CKM/JAE/jae

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Mr. L. A. Reyes, Regional Administrator
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