

SEP 03 1985

Georgia Power Company  
✓ATTN: Mr. R. J. Kelly,  
Executive Vice President  
P. O. Box 4545  
Atlanta, Georgia 30302

Gentlemen:

SUBJECT: VOGTLE READINESS REVIEW - INTERIM REVIEW QUESTIONS - MODULE NO. 3A  
"INITIAL TEST PROGRAM - PREOPERATIONAL TEST PHASE"

We have completed an initial review of the subject module, which you initially submitted to the NRC on June 25, 1985, as well as a change submittal which you submitted on July 29, 1985. As a result of these initial reviews, two Branches of the Office of Nuclear Reactor Regulation, and one Branch of the Office of Inspection and Enforcement, have generated questions and comments which need clarification and a written response. These questions and comments are as follows:

Containment Systems Branch

1. Page 13, Source Item #3276:

It is not clear why fan operation during the Integrated Leak Rate Test (ILRT) is necessary for their protection. This is counter to current ILRT practice. It is also not clear whether cooling water flow will be terminated during the ILRT. The impact of fan-cooler operation on stabilization of test conditions should also be evaluated.

2. Page 14, Source Item #4340:

The leakage rate that should be compared to 0.75 La is the upper confidence limit based on the statistical methodology of either BN-TOP1 or ANSI/ANS 56.8 1981. The commitment should be more precisely stated to reflect this.

3. Page 15, Source Item #3285/3286:

This is a commitment to test all Containment Isolation Valves (CIVs) in the Type C test program individually. Allowance should be made for the fact that with appropriate justification, series isolation valves may be leak tested simultaneously. The test fluid is a gas (usually air), unless the objective is to demonstrate the presence of a water seal that will preclude containment atmosphere leakage under accident conditions, in which case the test fluid is water. Those CIVs to be excluded from the Type C test program would be identified and appropriately justified (i.e., approved by the staff).

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## 4. Page 15, Source Item #3287:

A commitment to pressurize the Steam Generators (SGs) above containment pressure for the ILRT is not acceptable. The secondary side CIVs are not Type C tested because it is judged they are not potential containment atmosphere leak paths. This implies that the SG shell/piping (the first isolation barrier under GDC 57 criteria) has exceptional leakage integrity. For the ILRT, then, the SG air space should be atmospheric pressure to include the closed system (viewed as an inward protrusion of the containment boundary) in the ILRT, and thereby reaffirm this judgment.

Quality Assurance Branch

In the PSAR page 17.1-14, Section 17.1.2 (Enclosure 1), it is stated that the Vogtle quality assurance program will be applied to the preoperational testing of the Vogtle Nuclear Plant. In our review of Module 3A, we note that only certain of the quality assurance regulatory guides and standards are being applied, i.e., 1.8, 1.28, 1.30, 1.33, 1.37, 1.39, 1.58 and 1.116. It was our understanding during the review of the Vogtle quality assurance program description, and from the PSAR commitment in Section 17.1.2, that all of the quality assurance regulatory guides and standards would be applied i.e., 1.26, 1.29, 1.38, 1.64, 1.74, 1.88, 1.123, 1.144 and 1.146. At the August 19, 1985, meeting in Atlanta at Region II, Georgia Power Company explained that Appendix I of their May 24, 1985 submittal contained commitments to Regulatory Guides 1.144 and 1.146. It is not known whether other such Appendices contain references to other quality assurance related regulatory guides. Consequently, in order to facilitate this review and provide continuity for the review of future modules for the Vogtle Readiness Review Program, Georgia Power Company should provide a reference in the modules to clearly delineate which quality assurance regulatory guides will be applied.

Mechanical Engineering Branch

Item Nos. 4379 through 4381 - Commitment for preoperational testing of snubbers is acceptable. (Question 210.47) However, the applicant's response to Q210.47 relative to the preservice examination of snubbers is not included in the Module 3A Commitment Matrix.

Please review the above comments and questions and provide a written response. Your input is requested to be received on or before September 9, 1985. In view of NRC review schedule requirements, we also request a telecon for clarification and explanation of these questions as soon as you are able to respond. Please coordinate this telecon with W. H. Rankin (404-221-4197) of my staff.

Your assistance in responding to this request for additional information is appreciated.

ORIGINAL SIGNED BY  
VIRGIL L. BROWNLEE

Roger D. Walker, Director  
Division of Reactor Projects

cc: (See page 3)

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