

To: John Lamb,
Project Manager, U.S. Nuclear Regulatory Commission

Cc: NRC Document Control Desk
NRC Resident Inspector – Edwin I Hatch Nuclear Plant
NRC Resident Inspector – Vogtle Electric Generating Plant

Subject: Submission of Proposed Alternative to Submitting Hatch and Vogtle Inservice Inspection Summary Reports Within 90 Days of Outage Completion

Reference: NRC Letter from H. Nieh to NEI, *“U.S. Nuclear Regulatory Commission Planned Actions Related to the Requirements for ASME Code Inservice Inspection Reporting During the Coronavirus Disease 2019 Public Health Emergency,”* dated April 9, 2020

As a result of the Coronavirus Disease 2019 (COVID-19) public health emergency (PHE), Southern Nuclear Operating Company (SNC) requests an alternative from certain reporting requirements of 10 CFR 50.55a(b)(2)(xxxii), “Section XI condition: Summary report submittal” for Edwin I. Hatch Nuclear Plant (HNP) and Vogtle Electric Generating Plant (VEGP). This alternative is being requested pursuant to 10 CFR 50.55a(z)(2), *Hardship without a compensating increase in quality and safety*. The requirements of ASME B&PV Code, Section XI, IWA-1400, IWA-6240, and 10 CFR 50.55a(b)(2)(xxxii) state, in part, that inservice inspection summary reports shall be submitted to the U. S. Nuclear Regulatory Commission (NRC) within 90 calendar days of the completion of each refueling outage. IWA-6230 of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, which is incorporated by reference in 10 CFR 50.55a, requires licensees to complete an inservice inspection summary report within 90 days after the conclusion of a refueling outage, per Mandatory Appendix II. As an alternative to the requirements of Section XI, ASME Code Case N-532-5 allows for the use of the Owners Activity Report (OAR-1), which provides a summary of items with flaws or relevant conditions that required evaluation for continued service, and repair and replacement activities required for continued service that occurred during the previous operating cycle.

This alternative is necessary based on SNC and associated vendor measures to maintain Centers for Disease Control and Prevention (CDC) recommendations related to social distancing, worker screening, and limiting close-proximity work. To implement these measures, SNC requires mandatory telecommunicating for all employees whose job responsibilities enable them to do so. In addition, preparation of this report requires various vendor support. Vendors associated with the preparation of this report typically have similar mandatory telecommunicating requirements for their employees. Submitting this report within 90 days after the conclusion of a refueling outage would challenge SNC’s ability to maintain telecommunicating requirements for the individuals involved with the preparation of this report. Therefore, compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

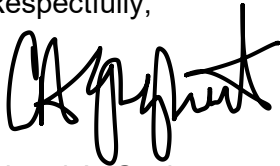
The Reference letter allows for an expedited review of a request for a deferral, provided certain information is provided. In accordance with the Reference letter, the following information is provided:

Station	Current Code Edition of Record	Current Due Date of OAR-1	Proposed Alternate Submission Date of OAR-1
Edwin I. Hatch Nuclear Plant	ASME Section XI 2007 Edition through 2008 Addenda	6/16/2020	90 days after PHE has ended or prior to the beginning of the subsequent refueling outage, whichever is earlier.
Vogtle Electric Generating Plant	ASME Section XI 2007 Edition through 2008 Addenda	6/29/2020	90 days after PHE has ended or prior to the beginning of the subsequent refueling outage, whichever is earlier.

HNP and VEGP have established procedures to retain records of its completed inspection items that are easily accessible for NRC inspection, specifically, NMP-ES-018, SNC Inservice Inspection Engineering Program, and NMP-ES-018-011, Inservice Inspection (ISI) Examinations Records.

SNC requests approval of this Alternative by June 9, 2020.

Respectfully,



Cheryl A. Gayheart
Regulatory Affairs Director