

From: Gleaves, Billy
Sent: Tuesday, June 22, 2021 4:35 PM
To: Nick Kellenberger (x2nrkell@southernco.com); Leighty, Steven
Cc: Buford, Angie; Mitchell, Matthew; Bowman, Greg; McKenna, Philip; Santos, Cayetano; Rankin, Jennie; Vogtle NPEmails; Honcharik, John; Benson, Michael
Subject: Draft RAI for Vogtle Electric Generating Plant, Unit 3, ALT-16, "Remediation of Containment Unistrut Welding"
Attachments: Vogtle Unit 3 Alternative ALT-16 Draft RAI 6-22-21.pdf

Steve and Nick,

The NRC has received your request for the subject alternative request on June 3, 2021 (ADAMS No. ML21154A210) and in the course of reviewing your request the NRC staff has identified the need for additional information. The draft request for additional information (RAI) is enclosed.

As is usual practice, this email and the draft RAI, attached, will be entered into non-public ADAMS until you inform us that it contains no sensitive information. We ask for this "sensitivity" response within 3 business days.

Please contact me if any part of this draft RAI is unclear and depending on the nature of the question, we can schedule the appropriate call or meeting.

We typically ask for your final response within a 30 day window (from your acceptance), however in this case due to the specific situation and in order to accommodate your requested schedule, once this draft RAI is accepted, we ask for a 14 day response. Any feedback is appreciated.

Respectfully,

Billy

William (Billy) Gleaves
Senior Project Manager
NRR/Vogtle Project Office
US Nuclear Regulatory Commission

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From: Gleaves, Billy

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Options

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REQUEST FOR ADDITIONAL INFORMATION
REQUEST FOR ALTERNATIVE
REGARDING ALTERNATIVE REQUIREMENTS FOR AMERICAN SOCIETY OF
MECHANICAL ENGINEERS, BOILER AND PRESSURE VESSEL CODE, SECTION III,
REMEDIATION OF CONTAINMENT VESSEL UNISTRUT WELDING (NO. VEGP 3-ALT-16)
DOCKET NO. 52-025
VOGTLE ELECTRIC GENERATING PLANT, UNIT 3
SOUTHERN NUCLEAR OPERATING COMPANY, INC.

By letter dated June 3, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21154A210), Southern Nuclear Operating Company, Inc. (the licensee) requested U.S. Nuclear Regulatory Commission (NRC) approval of an alternative, VEGP 3-ALT-16, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(z)(1)(i) to the requirements of American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) at Vogtle Electric Generating Plant (VEGP), Unit 3. The proposed alternative would allow the licensee to mechanically remove six pieces of Unistrut by grinding the unqualified weld metal flush with the containment vessel (CV) wall, and leave unqualified weld material in place for the life of the plant at VEGP, Unit 3.

10 CFR 50.55a(b) states, in part, that systems and components of boiling and pressurized water-cooled nuclear power reactors must meet the requirements of the ASME Code, Section III. Subsection NE of ASME Code, Section III provides the requirements for material, design, fabrication, examination, inspection, testing, and preparation of reports for metal containment vessels.

RAI 1, Question 1 of 1

The licensee stated on page 6 of Enclosure 1 of the submittal that surface exams of the CV will be conducted to identify any discontinuities. The licensee stated on page 8 of Enclosure 1 that surface exams will be performed to confirm the absence of surface defects. Finally, the licensee clarified on page 13 of Enclosure 1 that the surface examinations will consist of the magnetic particle and liquid penetrant nondestructive evaluation (NDE) techniques.

The application of NDE techniques may be governed by various ASME Code requirements for qualification of equipment and personnel. Indications discovered during NDE may be evaluated according to various ASME Code requirements.

To complete its evaluation, the NRC staff requests the following additional information be submitted on the docket:

- a. Describe the ASME Code requirements that will be used to perform the magnetic particle and liquid penetrant testing.
- b. Provide the acceptance criteria to be used and how indications will be dispositioned/repaired if found during the surface examinations. In addition, provide justification for the acceptance criteria for indications if found in the area of the weld remnant.