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May 30, 2008

Docket Nos.: 50-321 50-348 50-424  
50-366 50-364 50-425

NL-08-0481

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555-0001

Edwin I. Hatch Nuclear Plant  
Joseph M. Farley Nuclear Plant  
Vogtle Electric Generating Plant  
Three-Month Response to NRC Generic Letter 2008-01

Ladies and Gentlemen:

The Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01 "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems" to request that each licensee evaluate the licensing basis, design, testing, and corrective action programs for the emergency core cooling, decay heat removal, and containment spray systems, to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified. For Farley Nuclear Plant and Vogtle Electric Generating Plant (pressurized water reactor plants), these GL 2008-01 related systems correspond to Emergency Core Cooling Systems, Residual Heat Removal Systems, and Containment Spray Systems. For Hatch Nuclear Plant (boiling water reactor plant), these GL 2008-01 related systems correspond to Residual Heat Removal Systems, Core Spray Systems, High-pressure Coolant Injection Systems, and Reactor Core Isolation Cooling Systems.

The NRC, in GL 2008-01, requested each licensee to submit a written response in accordance with 10 CFR 50.54(f) within nine months of the date of the generic letter to provide the following information:

- "(a) A description of the results of evaluations that were performed pursuant to the requested actions. This description should provide sufficient information to demonstrate that you are or will be in compliance with the quality assurance criteria in Sections III, V, XI, XVI, and XVII of Appendix B to 10 CFR Part 50 and the licensing basis and operating license as those requirements apply to the subject systems;

- (b) A description of all corrective actions, including plant, programmatic, procedure, and licensing basis modifications that you determined were necessary to assure compliance with these regulations; and,
- (c) A statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule."

Additionally, the NRC requested that if a licensee cannot meet the requested response date, the licensee "...shall provide a response within 3 months of the date of this GL..." In the three-month response, the licensee was "...requested to describe the alternative course of action that it proposes to take, including the basis for the acceptability of the proposed alternative course of action." An extension was given by the NRC for the three-month response, documented in Southern Nuclear Operating Company letter to the NRC, dated April 8, 2008. The new three-month response date is no later than May 30, 2008.

Enclosure 1 to this letter contains Southern Nuclear Operating Company's three-month response to the information requested in NRC GL 2008-01.

Enclosure 2 to this letter contains a new commitment.

If you have any questions, please advise.

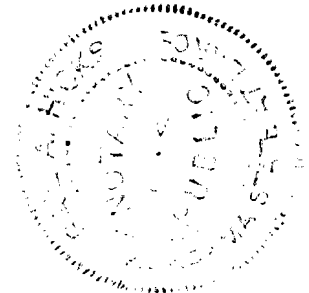
Mr. D. H. Jones states he is a Vice President of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and to the best of his knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



D. H. Jones  
Vice President – Engineering



Sworn to and subscribed before me this 30<sup>th</sup> day of May, 2008.

  
Notary Public

My commission expires: July 5, 2010

DHJ/JLS/phr

- Enclosures: 1. NRC Generic Letter 2008-01 Requested Information for a  
Three-Month Response
2. NRC Generic Letter 2008-01 Three-Month Response  
Commitment Table

cc: Southern Nuclear Operating Company  
Mr. J. T. Gasser, Executive Vice President  
Mr. J. R. Johnson, Vice President – Farley  
Mr. D. R. Madison, Vice President – Hatch  
Mr. T. E. Tynan, Vice President – Vogtle  
RType: CFA04.054; CHA02.004; CVC7000; LC# 14739

U. S. Nuclear Regulatory Commission  
Mr. L. A. Reyes, Regional Administrator  
Mr. R. A. Jervey, NRR Project Manager – Farley  
Mr. R. E. Martin, NRR Project Manager – Hatch  
Mr. R. A. Jervey, NRR Project Manager – Vogtle  
Mr. E. L. Crowe, Senior Resident Inspector – Farley  
Mr. J. A. Hickey, Senior Resident Inspector – Hatch  
Mr. G. J. McCoy, Senior Resident Inspector – Vogtle

Alabama Department of Public Health  
Dr. D. E. Williamson, State Health Officer

State of Georgia  
Mr. N. Holcomb, Commissioner – Department of Natural Resources

**Edwin I. Hatch Nuclear Plant  
Joseph M. Farley Nuclear Plant  
Vogtle Electric Generating Plant**

**Enclosure 1**

**NRC Generic Letter 2008-01 Requested Information for a  
Three-Month Response**

## Enclosure 1

### NRC Generic Letter 2008-01 Requested Information for a Three-Month Response

This response to Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," addresses the three-month response requested in NRC GL 2008-01, dated January 11, 2008. This response discusses:

- the required evaluations that will not be complete prior to nine months from the date of GL 2008-01,
- the alternative course of action planned, and
- the basis for the acceptability of the alternative course of action.

#### Design Evaluations That Will Not Be Complete Prior To Nine Months From The Date Of GL 2008-01

The information requested in GL 2008-01 includes "(a) A description of the results of evaluations that were performed..." The evaluations performed are those required to ensure that gas accumulations are maintained less than the amount that challenges operability of these systems.

For some piping segments the existing drawings may not be sufficiently accurate to complete the required evaluations and it may not be possible to perform the walkdowns on these piping segments prior to nine months from the date of GL 2008-01 due to one or more of the following reasons:

- High radiation areas during power operation need to be entered.
- Confined spaces need to be entered.
- Prolonged containment entries during power operation need to be made.
- Piping is buried.
- Insulation needs to be removed from piping.
- Scaffolding needs to be erected.

Non-outage related walkdowns of piping segments that require high radiation area access, scaffolding and/or insulation removal, confined space entry, or is related to buried piping will be completed promptly, with consideration given to nuclear and industrial safety.

Walkdowns of piping segments that require a refueling outage for performance are currently planned to be completed according to the following schedule:

- Fall 2008 - Farley Unit 2
- Fall 2008 - Vogtle Unit 2
- Spring 2009 - Hatch Unit 2
- Spring 2009 - Farley Unit 1
- Fall 2009 - Vogtle Unit 1
- Spring 2010 - Hatch Unit 1

## Enclosure 1

### NRC Generic Letter 2008-01 Requested Information for a Three-Month Response

Southern Nuclear Operating Company (SNC) is in the process of planning the non-outage related and outage related walkdowns. As the planning progresses, the above schedule may need to be revised. SNC will provide an updated schedule with the nine-month response. The current schedule for these walkdowns is acceptable due to the low risk of gas intrusion issues. This acceptability is based on updated surveillance procedures, recent operating history, adequacy of the current design basis (as determined from previous system evaluations such as for INPO SOER 97-01 "Potential Loss of High Pressure Injection and Charging Capability from Gas Intrusion" and SER 2-05 "Gas Intrusion in Safety Systems"), and Engineering and Operator training coverage of the gas intrusion subject.

#### Testing Evaluations That Will Not Be Complete Prior To Nine Months From The Date Of GL 2008-01

The information requested in GL 2008-01 includes "(a) A description of the results of evaluations that were performed..." The evaluations performed are those required to ensure that gas accumulations are maintained less than the amount that challenges operability of these systems.

The requested action would require that a review of all applicable procedures be complete prior to nine months from the date of GL 2008-01. Therefore, the requested action will not be entirely complete prior to nine months from the date of GL 2008-01 due to the large number of plant procedures to be reviewed. The scope of procedures that may be affected by the evaluation(s) requested in GL 2008-01 includes:

- Maintenance,
- Testing (e.g., all pump tests including restoration to standby conditions), and
- Plant evolutions (e.g., suction source change such as tank to suppression pool or RWST to containment sump or evolutions involving idle train startup)

The current plan for completing all procedure reviews is acceptable based on previous procedure reviews associated with previously identified gas intrusion issues. As a compensatory measure, additional pre-job briefing will be conducted for activities that have been associated with gas accumulation issues, to stress measures to identify and eliminate gas voids and to take appropriate corrective actions for any conditions adverse to quality.

#### Corrective Action Evaluations That Will Not Be Complete Prior To Nine Months From The Date Of GL 2008-01

The information requested in GL 2008-01 includes "...(b) A description of all corrective actions, including plant, programmatic, procedure, and licensing basis

## Enclosure 1

### NRC Generic Letter 2008-01 Requested Information for a Three-Month Response

modifications that you determined were necessary to assure compliance with these regulations; and, (c) A statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.”

The requested description of all corrective actions pertaining to procedure modifications would require that a review of all applicable procedures be complete prior to nine months from the date of GL 2008-01. Therefore, the requested description of all corrective actions that result from the procedure reviews will not be entirely complete prior to nine months from the date of GL 2008-01 due to the large number of plant procedures to be reviewed. The scope of procedures that may be affected by the evaluation(s) requested in GL 2008-01 includes:

- Maintenance,
- Testing (e.g., all pump tests including restoration to standby conditions), and
- Plant evolutions (e.g., suction source change such as tank to suppression pool or RWST to containment sump or evolutions involving idle train startup)

The current plan for completing all procedure reviews is acceptable based on previous procedure reviews associated with previously identified gas intrusion issues. As a compensatory measure, additional pre-job briefing will be conducted for activities that have been associated with gas accumulation issues, to stress measures to identify and eliminate gas voids and to take appropriate corrective actions for any conditions adverse to quality.

Additionally, all corrective actions associated with plant modifications will not be identified prior to nine months from the date of GL 2008-01. The current plan is due to the need to complete walkdowns of all applicable piping. This walkdown plan was discussed previously in this response, in design evaluation discussion.

**Edwin I. Hatch Nuclear Plant  
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Vogtle Electric Generating Plant**

**Enclosure 2**

**NRC Generic Letter 2008-01 Three-Month Response  
Commitment Table**



**Enclosure 2**

**NRC Generic Letter 2008-01 Three-Month Response  
Commitment Table**

<b>Commitment</b>	<b>Type</b>		<b>Scheduled Completion Date (If Required)</b>
	<b>One-Time Action</b>	<b>Continuing Compliance</b>	
GL 2008-01 required licensing basis evaluations completed.	X		Prior To Nine Months From The Date Of GL 2008-01