PMComanchePeakPEm Resource

From: Monarque, Stephen
Sent: Friday, June 26, 2009 3:32 PM
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Cc: Willingham, Michael; ComanchePeakCOL Resource
Subject: Comanche peak RAI # 7 - Section 10.03.06
Attachments: RAI 2513(RAI 7).doc

The NRC staff has identified that additional information is needed to continue its review of the combined license application. The staff's request for additional information (RAI) is contained in the attachment. Within five calendar days of the date of this letter, please indicate if you wish to have a conference call.

The response to this RAI is due within 35 calendar days of June 26, 2009.

Note: If changes are needed to the safety analysis report, the NRC staff requests that the RAI response include the proposed wording changes.

thanks,

Stephen Monarque
U. S. Nuclear Regulatory Commission
NRO/DNRL/NMIP
301-415-1544

Hearing Identifier: ComanchePeak_COL_Public
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From: Monarque, Stephen

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Request for Additional Information (RAI) No. 2513 Revision 0

RAI # 7

6/26/2009

Comanche Peak Units 3 and 4
Luminant Generation Company, LLC.
Docket No. 52-034 and 52-035
SRP Section: 10.03.06 - Steam and Feedwater System Materials
Application Section: 10.3

QUESTIONS for Component Integrity, Performance, and Testing Branch 1 (AP1000/EPR Projects) (CIB1)

10.03.06-1

Standard combined license (COL) application (COLA) Item 10.3(1) “FAC Monitoring Program” is identified in the Final Safety Analysis Report (FSAR), Table 1.8-2, as a COL Applicant Item, and FSAR Section 10.3.6.3.1 provides a general description of the Comanche Peak Units 3 and 4 (CPNPP) flow accelerated corrosion (FAC) program. To address the FAC (also known as "erosion-corrosion") concerns discussed in NRC Generic Letter 89-08, "Erosion Corrosion Induced Pipe Wall Thinning," (May 2, 1989), the NRC staff requests that the applicant modify the FSAR to include the implementation schedule for the detailed FAC program that will be used at CPNPP. In addition, please revise the FSAR to include a description of the FAC program activities that will be conducted during the plant construction phase, and the schedule for those activities.

10.03.06-2

Due to factors such as the wall thickness tolerance in pipe fabrication and wall thinning due to bending, preservice measurements of as-built components considered susceptible to flow accelerated corrosion (FAC) are needed to accurately detect and assess inservice degradation. Some of the complications resulting from a lack of baseline thickness information are discussed in Electric Power Research Institute NSAC-202L R2, "Recommendations for an Effective Flow Accelerated Corrosion Program," the industry guidance document referenced in NUREG-0800, Standard Review Plan Section 10.3.6. Please revise the FSAR to address the concerns discussed in NRC Generic Letter 89-08 and include a demonstration that an effective, long-term FAC monitoring program is in place at CPNPP. Please clarify whether the FAC monitoring program that will be used at CPNPP will include preservice thickness measurements of as-built components considered susceptible to FAC. Please also clarify whether in accordance with industry guidelines, these measurements will use grid locations and measurement methods commonly used for inservice inspection.

10.03.06-3

Section 10.3.6.3.1.1 of the CPNPP COLA FSAR states that for each piping component, the analytical method predicts the flow accelerated corrosion (FAC) wear rate, and trends the estimated inspection interval, repairs, and/or replacement. To ensure that the

FAC concerns discussed in NRC Generic Letter 89-08 are addressed in the COLA, the NRC staff requests that the applicant revise Section 10.3.6.3.1.1 of the FSAR to identify, for safety-related components designed to ASME Code, Section III, and non-safety-related components whose failure could impact safety-related structures, systems, and components, the industry guidelines or established procedure that will be used at CPNPP to determine the minimum allowable wall thickness at which the component must be repaired or replaced.