

From: Peter Tam
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Date: 3/8/01 10:07AM
Subject: NMP2: Risk-informed relief request of 10/16/00 **(TAC MB0297)**

Steve:

While reviewing the subject relief request, our reviewer Shou-Nien Hou came up with the following comments. Please call me to set up a conference call to discuss. **This e-mail does not currently convey a formal NRC position or a formal request for additional information.** We will agree on disposition of the following comments/questions in the conference call:

1. In Section 2.1 of the RI-ISI Program Plan, the alternative RI-ISI program is limited to ASME Class 1 and Class 2 piping systems:

(a) The Class 1 pipe components under Examination Category B-F are included in the proposed RI-ISI program plan. In accordance with Table IWB-2500-1 in the ASME Code, B-F welds include both butt and socket welds for all pipe sizes. Please clarify the scope of B-F welds, preferably by the item number in the ASME Table, included in the RI-ISI program.

(b) The Class 1 pipe components under Examination Category B-J are included in the proposed RI-ISI program plan. In accordance with Table IWB-2500-1 in the ASME Code, B-J welds include circumferential, longitudinal, and socket welds for all pipe sizes. Please clarify the scope of B-J welds, preferably by the item number in the ASME Table, included in the RI-ISI program.

(c) The Class 2 pipe components under Examination Categories C-F-1 and C-F-2 are included in the proposed RI-ISI program plan. In accordance with Table IWC-2500-1 in the ASME Code, C-F welds include circumferential, longitudinal, and socket welds for all pipe sizes. Please clarify the scope of C-F welds, preferably by the item number in the ASME Table, included in the RI-ISI program.

2. In Section 3.5 of the RI-ISI Program Plan, the licensee states that NMP2's RI-ISI program will be inspecting greater than 10% of the Class 1 piping systems as given in Table 3.5-1. In accordance with Table 5-1, there are 94 Class 1 welds selected for inspection under the RI-ISI program. Please provide the population of Class 1 B-J and B-F welds within the scope of the RI-ISI program.

3. As discussed in Section 3.2.3 of the NRC SER related to EPRI TR-112657 dated October 28, 1999, a pipe segment susceptible to a degradation other than FAC and which also has the potential for water hammer should receive a high pipe failure potential. The licensee has not identified water hammer as a potential degradation mechanism for selected pipe segments. Please clarify if any of the selected system welds are susceptible to water hammer and any other aging mechanism other than FAC.

4. Is there any recognizable plant experience regarding piping failures at NMP2?

5. In Table 3.8-1B, for FWS and WCS systems under the 'Augmented Credit in RI-ISI' column it is marked '1' for one of the risk category with FAC as degradation mechanism. The number of weld locations selected for inspection under RI-ISI is zero as indicated under the column 'Locations Inspected/RI-ISI'. Please clarify.

6. For FWS, ICS, RHS, RPV, and WCS, there are welds in certain risk categories that are exposed to another degradation mechanism (e.g., TASCs, CC, TT) in addition to FAC or IGSCC. All welds in these specific risk categories are typically selected in the augmented FAC or IGSCC program. In some cases, none of these welds are selected in the RI-ISI program. Since the weld examination volume for one aging degradation type may be different from another aging degradation type, please clarify how welds in these specific risk categories are examined for the degradation mechanism (e.g., TASCs, CC, TT) other than FAC or IGSCC.

7. There are some differences when Table 3.8-1B and Table 3.8-2A (or 2B) are compared with respect to the following:

- (i) number of welds currently inspected in accordance with Section XI (DER, ISC, MSS, RDS, RPV, SLS, and WCS),
- (ii) missing degradation mechanism for each risk category (RPV and WCS),
- (iii) missing consequence for each risk category (FWS and RHS), and
- (iv) missing high consequence welds for WCS.

Please clarify the discrepancies between the data presented in these tables with respect to the above four subject areas.

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Reply Requested: No
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Concealed Subject: No
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