

From: Michael Webb
To: DAVANT, GUY H
Date: 12/3/03 1:58PM
Subject: RAI re: MC1032 (VRR-008)

Guy,
I received the attached RAI from the Mechanical & Civil Engineering Branch (Components & Containment Section).

We can discuss them after you have had an opportunity to review them.

CC: NORRIS, GREGORY P

RIVER BEND STATION

DOCKET 50-458

PM: Michael Webb

Mail Envelope Properties (3FCE325A.FB2 : 5 : 21368)

Subject: RAI re: MC1032 (VRR-008)
Creation Date: 12/3/03 1:58PM
From: Michael Webb

Created By: MKW@nrc.gov

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RAIs-relief request VRR-08.wpd		10105
MESSAGE	837	12/03/03 01:58PM

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Request for Additional Information (RAI)
River Bend Station, Unit 1
Relief Request No. VRR-008
Reactor Core Isolation Cooling Pump Suction Line Check Valve
E51-VF030
Docket Nos. 50-458 (MC1032)

Reference: Entergy Operations, Inc., River Bend Station, "Submittal of Relief Request VRR-008 to use Alternative Testing Frequency Inservice Testing of Valve E51-VF030 for Third 10-year Interval Inservice Testing Program." Docket No. 50-458, October 13, 2003.

The NRC staff needs the following additional information to complete its review.

RAI 1: Provide the related P&IDs drawings which contains the relief request's check valve E51-VF030 in the Reactor Core Isolation Cooling System from RCS system to the check valve.

RAI 2: The Relief Request VRR-08 does not address the safety and risk significance of on-line IST of the check valve E51-VF030. Please address (either in a qualitative or quantitative manner) the potential risk of disassembly and inspection of this check valve on-line compared to the risk when the plant is shutdown.

RAI 3: Provide sufficient information for NRC staff to reach a safety or risk determination with regards to the leak testing experience and leak tightness reliability of the associated pressure isolation valves and the potential consequences of a loss of isolation capability during disassembly, inspection, and manual exercising of this check valve E51-VF030.

RAI 4: Based on the risk significance discussed in RAI 3 above, discuss what preventive or compensatory measures are necessary to maintain safety and minimize risk while performing on-line IST.

RAI 5: Under the section entitled Basis for Relief, the licensee states that the maintenance rule 10 CFR 50.65(a)(4) requires licensees to assess and manage the increase of risk that may result from proposed maintenance activities. However, in order for the staff to evaluate whether the proposed IST alternative is acceptable, the licensee must demonstrate that the alternative provides an acceptable level of quality and safety pursuant to 10 CFR 50.55a(a)(3)(i). Performing a risk assessment of the proposed on-line testing at the time of IST does not address why on-line testing provides an acceptable level of quality and safety at this time. Meeting the maintenance rule is a separate regulatory requirement. Nonetheless, discuss how risk insights, as well as other factors, will be used to establish when IST should be performed either on-line or during refueling outages.

RAI 6: Explain how Technical Specification requirements for the Reactor Core Isolation Cooling (RCIC) system will be satisfied while performing on-line IST of this check valve E51-VF030 in the system. Specifically, address the limiting condition for operation (LCO) and describe the actions the licensee will take to ensure that on-line IST will be accomplished within the allowed outage time. Discuss the typical amount of time needed to complete the IST of this check valve based on previous testing experience. Similarly, describe any contingency plans that will be in effect to provide reasonable confidence that the AOT will not be exceeded if the check valve is found to be in a significantly degraded or unacceptable condition.