# April 28, 2004

Mr. Bryce L. Shriver Senior Vice President and Chief Nuclear Officer PPL Susquehanna, LLC 769 Salem Boulevard, NUCSB3 Berwick, PA 18603-0467

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) - SUSQUEHANNA STEAM

ELECTRIC STATION, UNITS 1 AND 2 (SSES 1 AND 2) - THIRD 10-YEAR INSERVICE INSPECTION INTERVAL PROGRAM PLAN RE: PRESSURE RETAINING WELDS (TAC NOS. MC1181, MC1182, MC1183, MC1184,

MC1187, AND MC1188)

Dear Mr. Shriver:

In reviewing your submittal of September 16, 2003, relating to Relief Request Nos. 3RR-01, 3RR-02, and 3RR-04, the Nuclear Regulatory Commission staff has determined that additional information contained in the enclosure to this letter is needed to complete its review. These questions were discussed with your staff during a teleconference on April 8, 2004. As agreed to by your staff, we request you respond within 30 days of the date of this letter.

If you have any questions, please contact me at 301-415-1030.

Sincerely,

#### /RA/

Richard V. Guzman, Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-387 and 50-388

Enclosure: RAI

cc w/encl: See next page

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DATE	4/20/04	4/20/04	4/23/04	4/26/04

# REQUEST FOR ADDITIONAL INFORMATION

# RELATING TO RELIEF REQUEST NOS. 3RR-01, 3RR-02, and 3RR-04 FOR

#### THIRD 10-YEAR INSERVICE INSPECTION PROGRAM PLAN

# PRESSURE RETAINING WELDS FOR

#### SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2

# PPL SUSQUEHANNA, LLC (PPL)

## DOCKET NOS. 50-387 AND 50.388

#### 3RR-01

- PPL references an Item Number B5.140 from Table IWB-2500-1, Examination Category B-F. Table IWB-2500-1, Examination Category B-F, of the American Society of Mechanical Engineers (ASME) *Boiler and Pressure Vessel Code*, Section XI, 1998 Edition through the 2000 Addenda does not list an Item Number B5.140. Please delete or correct the Item Number.
- 2. In PPL's "Risk-Informed Inservice Inspection (RI-ISI) Program Report," Section 3.5, "Inspection Location Selection and NDE Selection under Additional Examinations," PPL states that "examinations performed that reveal flaws or relevant conditions exceeding the applicable acceptance standards shall be extended to include additional examination." Please provide a specific time line for all scenarios that would require an inspection sample increase. Also, be more specific as to the time frame of additional inspections that may become necessary if flaws are found in the first sample expansion. The Nuclear Regulatory Commission (NRC) staff expects that sample expansion examinations will be performed in the same time frame that is outlined in the ASME, Section XI IWB-2430.
- 3. PPL states that it will use Table 1, Examination Category R-A, "Risk-Informed Piping Examinations," contained in Code Case N-578-1. Does PPL have any elements that fall under Item No. R1.19 that are socket welds? If so, does PPL intend to take exception to Note 12 of the table and perform a surface examination?
- 4. In PPL's RI-ISI Program Report, the introduction section states, "To strengthen the technical basis for the RI-ISI program beyond the minimum requirements implied by the Electric Power Research Institute, RI-ISI Topical Report (TR), a number of enhancements were made to the process that are described in the paragraphs below." Please provide a list of all enhancements.

5. Identify any portions of Code Case 578-1 that PPL has used in the development if its RI-ISI program that are not specifically incorporated into or referenced by EPRI TR-11265, Revision B.

# 3RR-02

- 1. PPL did not clearly state what the impracticality is in performing the required inspections. Based on the understanding that the NRC staff currently has regarding the licensee's request, the staff would not consider the licensee's situation to be impractical and would need supporting information to support a review under Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Section 50.55a(a)(3)(i) or (ii). Should PPL decide to apply for relief under (3)(i), it would need to show that its alternative provides an acceptable level of quality and safety. Should PPL choose to apply for relief under (3)(ii), it would need to make a clear case that compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.
- 2. Please provide information regarding previous pump weld inspections including scope of inspections and results.
- 3. If the pumps are disassembled for maintenance or repair, does PPL intend to perform the required examinations in accordance with the Code requirements?
- 4. PPL does not provide an adequate explanation/description of its alternative in the "Proposed Alternative Examinations" section of its request. Please explain in a clear and concise manner, the proposed alternative.
- 5. PPL states that other required examinations/tests of pumps will be performed to provide reasonable assurance of structural integrity, but the examinations/tests and the frequency that PPL refers to is not provided. Please provide more information and basis for relief regarding the performance and frequency of the other required examination and/or tests of pumps.

#### 3RR-04

- 1. Please provide a drawing that clearly shows interference that prevents a Code-required inspection from being performed (including dimensions).
- 2. Discuss any present or past leaking or degradation issues concerning the control rod drive housing welds at SSES 1 and 2 or other similar units.
- 3. Discuss the inspection scope of the affected welds for the second 10-year inservice inspection interval.

4. PPL does not clearly state what the impracticality is in performing the required inspections. From the information that PPL did provide, the NRC staff would not consider PPL's situation to be impractical and would need supporting information to support a review under 10 CFR 50.55a(a)(3)(i) or (ii). Should PPL decide to apply for relief under (3)(i), it would need to show that its alternative provides an acceptable level of quality and safety. Should PPL choose to apply for relief under (3)(ii), it would need to make a clear case that compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. Provide an explanation of the hardship or unusual difficulty in performing the Code required examination with as much supporting information as possible.

#### Susquehanna Steam Electric Station, Unit Nos. 1 and 2

CC:

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# Susquehanna Steam Electric Station, Unit Nos. 1 and 2

cc:

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Dr. Judith Johnsrud National Energy Committee Sierra Club 443 Orlando Avenue State College, PA 16803