

From: Mahesh Chawla
To: Jack.Levaille@nmcco.com
Date: 6/3/05 9:43AM
Subject: RR to Implement Risk-Informed ISI Scheduling for the 4th 10-Year Inspection Interval for PI U1&2

With respect to your above application for Relief, the NRC Staff would like to discuss the following Request for Additional Information (RAI). The first two questions were transmitted to you on 5/31/05 via e-mail. The staff has additional question which is added here as question no.3. Please arrange a conference call with your technical staff to go over these questions.

1. Did you exclude Class 2 pipe or welds that are exempt from American Society of Mechanical Engineers (ASME) inspection requirements from the population of welds evaluated in your RI-ISI program? Both Regulatory Guide 1.178 and EPRI TR-112657 simply discuss Class 2 welds and do not differentiate between welds exempted from ASME inspection requirements and welds not exempted from these requirements. If you did exclude these Class 2 pipe welds from your RI-ISI program, please identify the guidance you relied upon to exclude welds from your RI-ISI program scope based on them being exempt from ASME inspection requirements.

2. On page 5 of your submittal, you describe the Westinghouse Owners Group probabilistic risk assessment (PRA) Peer Certification Review that was performed on the 1999 update PRA model. Per Regulatory Guide 1.178 dated September 2003, please list all Level A and B "Facts and Observations" from the review and how they have been addressed in the Revision 1.2 model. If some of the Level A and B "Facts and Observations" have not been addressed, please state why they are not expected to result in model changes that could significantly affect the overall results or conclusions of the RI-ISI consequence evaluation.

3. The Unit 1 and Unit 2 Reactor Coolant System in Tables 5-1-1 and 5-1-2 identify welds in the examination category B-F. Please specify if the welds in this examination category are piping welds or reactor vessel welds since the 1989 Edition of the ASME Code, Section XI, identifies dissimilar metal welds in B-F examination category to either the piping or the vessel welds. It is noted also that the risk-informed inservice inspection program in accordance with EPRI TR-112657, Revision B-A is applicable to the examination category B-F for piping welds.

CC: Prakash Patnaik

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From: Mahesh Chawla

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