

April 3, 2008

To: Tony Browning            DAEC            319-851-7750 / 7364 (fax)

From: Karl Feintuch            USNRC            301-415-3079 / 1222 (fax)

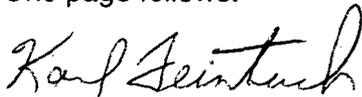
Subj: MD7420 – DRAFT – Request for additional information

Ref: Amendment Application Letter dated 11/14/2007 regarding revision to TS5.5.12 utilizing TSTF-343 Rev 1 (ML073320232).

Attached is a draft of RAI items pertaining to the referenced application. These items were provided by our Mechanical and Civil Engineering Branch (EMCB, reviewer – George Thomas).

Please review these items: (1) to ensure that they are clear; (2) to request a conference call, if clarification of the items is needed; and (3) to confirm a suitable date for your response. As a guideline, a 30-day response after today would correspond to May 5, 2008.

One page follows.



Karl Feintuch  
Project Manager

(This document was transmitted by fax to the recipient on April 3, 2008 – kdf 4/3/2008)

===== DRAFT =====  
**REQUEST FOR ADDITIONAL INFORMATION**  
**TS 5.5.12 CHANGE REQUEST, DUANE ARNOLD ENERGY CENTER**  
**DOCKET NO. 50-331 (TAC NO. MD7420)**

Reference: Letter No. NG-07-0729 dated November 14, 2007, from Richard L. Anderson, FPL Energy Duane Arnold, LLC, to USNRC regarding Technical Specification Change Request, TSCR-094, Application for Technical Specification Improvement to adopt TSTF-343, Revision 1, "Containment Structural Integrity," to Add Exception for Visual Inspection of the Containment, Affected Technical Specification: Section 5.5.12 (ADAMS Accession No. ML073320232)

RAI 1

Statements supporting the requested Technical Specification change have been made in different sections of Enclosure A of the Reference application as indicated below:

- (a) In the second paragraph of Section 1.0 "Description", it is stated that: "As a result, FPL Duane Arnold will be required to perform one less visual inspection of the containment during the ten year interval."
- (b) In the fourth paragraph of Section 4.0 "Technical Analysis", it is stated that: "... The combination of the Code requirements for rigor of the visual examinations plus the third party review will more than offset the fact that one fewer visual examination of the containment will be performed during a 10-year interval."
- (c) In addressing items 1, 2, and 3 of Section 5.1 "No Significant Hazards Consideration," it is stated that: "... The proposed change affects the frequency of visual examinations that will be performed for the containment. ...."

The statements in items (a), (b) and (c) above are true for concrete surfaces of Code Class CC containments. However, for the Duane Arnold Mark I steel containment which is classified as Code Class MC, these statements are not true and are inconsistent with TSTF-343, Revision 1, with regard to meeting the intent of regulatory position C.3 of RG 1.163 (September 1995) by using the general visual examination requirements of the ASME Code Section XI, Subsection IWE. Please discuss the apparent inconsistency of these statements with TSTF-343, when extended to Class MC containments, with regard to the number and frequency of general visual examinations to be performed in accordance with the ASME Section XI Code, Subsection IWE that would satisfy the intent of regulatory position C.3 of RG 1.163. Also, confirm if one of these IWE general visual examinations will be conducted prior to initiating the Type A test.

RAI 2

Since Duane Arnold has been granted a one-time extension of the Type A test interval under Option B of 10 CFR 50, Appendix J from 10 years to 15 years in 2003, indicate how many IWE general visual examinations will be scheduled over a 15-year Type A test interval to meet the intent of regulatory position C.3 of RG 1.163 which is specified for a 10-year interval. (Note that the staff has accepted a total of four general visual examinations over the 15 year interval such that one is scheduled to be conducted prior to initiating a Type A test and the remaining three during three other refueling outages between Type A tests.)

===== END DRAFT =====