

July 11, 2008

Mr. Richard L. Anderson
Vice President
Duane Arnold Energy Center
3277 DAEC Road
Palo, IA 52324-9785

SUBJECT: DUANE ARNOLD ENERGY CENTER – REQUEST FOR ADDITIONAL INFORMATION PERTAINING TO REVISED REQUEST NDE-R009 TO ALLOW USE OF PROVISIONS OF IWA-4132 FOR REMAINDER OF FOURTH 10-YEAR INSERVICE INSPECTION INTERVAL (TAC NO. MD8192)

Dear Mr. Anderson:

The Nuclear Regulatory Commission (NRC) staff is reviewing your application dated March 20, 2008, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML080990626) for the subject relief request. On June 27, 2008, the NRC staff transmitted a draft Request for Additional Information (RAI) and discussed the draft RAI with your staff on July 2, 2008.

Enclosed please find the final RAI, which is identical in content to the draft RAI. Your staff agreed that you can provide your response by July 30, 2008. Please contact me if you need further clarification of the RAI.

Sincerely,

/RA/

Karl D. Feintuch, Project Manager
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-331

Enclosure:
Request for Additional Information

cc w/encls: See next page

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ADAMS ACCESSION NUMBER: ML081910030

OFFICE	NRR/LPL3-1/PM	NRR/LPL3-1/LA	NRR/LPL3-1/BC
NAME	KFeintuch	THarris	LJames
DATE	07/10/08	07/9/08	07/11/08

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REQUEST FOR ADDITIONAL INFORMATION

RELIEF REQUEST NDE-R009

DUANE ARNOLD ENERGY CENTER

FPL ENERGY DUANE ARNOLD, LLC

DOCKET NO. 50-331

By letter dated March 28, 2008, FPL Energy Duane Arnold submitted relief request NDE-R009 for Nuclear Regulatory Commission (NRC) review and approval regarding the stock rotation of recirculation pump seal flange assemblies. To complete its review, the NRC staff requests the following additional information.

1. On page 5 of Relief Request NDE-R009, Item 5 requires that "...Preservice and inservice inspections (ISI) will be completed (i.e., visual VT-1 of the bolting)...."
(a) confirm whether the visual VT-1 of the bolting will be performed per IWA-2211 of the American Society of Mechanical Engineers Code, Section XI, which defines VT-1 as detection of discontinuities and imperfections on the surface of components (bolts in this case) including such conditions as cracks, wear, corrosion, or erosion, (b) because VT-1 examination does not look for leakage, discuss when or how potential leakage from the reactor coolant pump (RCP) seal flange assembly will be detected during preservice and inservice inspections, (c) discuss why volumetric or surface examinations are not required (or are not mentioned) to be conducted on the parts of the RCP seal flange assembly, and (d) discuss the frequency of the inservice inspections.
2. On page 5 of Relief Request NDE-R009, Item 8 requires that "...Testing of the seal flange assembly will be completed as needed to determine acceptability...."
(a) clarify what testing is intended or implied in Item 8 and whether this is preservice and/or inservice testing, and (b) discuss why the testing will be performed on an "as-needed" basis. The staff believes that testing should be performed whenever the RCP seal flange assembly is replaced to show the structural integrity of the replacement component.
3. On page 5, second paragraph, of Relief Request NDE-R009, the licensee stated that "...If there is a repair/replacement activity performed on the item to be installed, FPL Duane Arnold plans to follow IWA-4000, including the use of an Inspector, NIS-2 form and pressure testing..." (a) item 1 (on page 4) states that the seal flange assembly being installed will be a like-for-like "replacement." This implies that the stock rotation is a repair/replacement activity and not preventive maintenance activity. However, on pages 3, 4, and 5, the licensee states that the subject stock rotation is of preventive maintenance. Clarify whether the RCP seal flange rotation is a replacement activity or preventive maintenance activity, (b) it seems that the licensee does not intend to perform pressure testing for the subject stock rotation because it considers the subject stock rotation as a preventive maintenance activity. In absence of pressure testing, discuss how the installed RCP seal flange assembly can be shown to be operable without

ENCLOSURE

leakage regardless whether the subject stock rotation activity is preventive maintenance or repair/replacement activity, and (c) explain why pressure testing (i.e., system leakage testing) is not needed.

4. Provide the end date for the fourth 10-year inservice inspection interval at Duane Arnold.

Duane Arnold Energy Center

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Last revised July 2, 2008