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March 26, 2009 JAFP-09-0035

U.S. Nuclear Regulatory Commission Document Control Desk Washington, D. C. 20555

Subject:

Entergy Nuclear Operations, Inc.

James A. FitzPatrick Nuclear Power Plant

Docket No. 50-333 License No. DPR-59

James A. FitzPatrick Nuclear Power Plant – Response to Request For Additional Information Regarding: Request For Additional Information Re: Third Ten-Year Inservice Inspection Interval Program Plan Relief Request RR-CRV-01 (TAC NO. MD8717)

References: 1) Entergy Letter, JAFP-08-0038, James A. FitzPatrick Nuclear Power Plant Inservice Inspection Program Relief Requests Third Ten-year Interval Closeout (TAC No. MD8717), dated April 30, 2008.

- 2) USNRC Letter, James A. FitzPatrick Nuclear Power Plant Response to Request For Additional Information Regarding: Request For Additional Information Re: Third 10-Year Inservice Inspection Interval Program Plan Relief Request RR-CRV-01 (TAC NO. MD8717), dated November 19, 2008.
- 3) Entergy Letter, JAFP-09-0008, James A. FitzPatrick Nuclear Power Plant Response to Request For Additional Information Regarding: Request For Additional Information Re: Third Ten-Year Inservice Inspection Interval Program Plan Relief Request RR-CRV-01 (TAC NO. MD8717)

Dear Sir or Madam:

Entergy Nuclear Operations Inc., (ENO) submitted James A. FitzPatrick Nuclear Power Plant Inservice Inspection Program Relief Requests Third Ten-year Interval Closeout, dated April 30, 2008 [Reference 1]. Subsequently ENO received James A. Fitzpatrick Nuclear Power Plant - Request for Additional Information Re: third 10-year Inservice Inspection Interval Program Plan Relief Request RR-CRV-01 (TAC No. MD8717), dated November 19, 2008 [Reference 2]. Entergy responded to the request for additional information on January 20, 2009 [Reference 3].

On February 20, 2009 the NRC staff in a telephone conference with the James A. FitzPatrick Nuclear Power Plant (JAF) staff requested a more detailed description of the lower head region welds where JAF did not achieve full examination coverage during the third Inservice

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Inspection Interval. Although a verbal description was provided during the telephone conference this letter transmits a written description. The configuration of the welds, the amount of coverage, and the similarities between the inspected weld areas and the uninspected areas are described in Enclosure 1.

There is no new commitment made in this letter.

If you have any questions or require additional information, please contact Mr. Joseph Pechacek, Licensing Manager, at 315-349-6766.

Sincerely,

ACTIVIC FOR
Joseph Pechacek
Licensing Manager

Enclosure 1: Description of Lower-Head Welds and Third Inservice Inspection Interval Examination Coverage

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CC:

Mr. Samuel J. Collins, Regional Administrator U.S. Nuclear Regulatory Commission, Region 475 Allendale Road King of Prussia, PA 19406-1415

Office of NRC Resident Inspector James A. Fitzpatrick Nuclear Power Plant P.O. Box 136 Lycoming, New York 13093

Mr. Paul Tonko, President New York State Energy Research and Development Authority 17 Columbia Circle Albany, New York 12203-6399 Mr. Bhalchandra Vaidya, Project Manager Plant Licensing Branch U.S. Nuclear Regulatory Commission Mail Stop O-8-G14 Washington, DC 20555

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Enclosure 1

Description of Lower-Head Welds

And

Third Inservice Inspection Interval Examination Coverage

Description of Lower-Head Welds and Third Inservice Inspection Interval Examination Coverage

The lower-head area is shown in figures 2 through 7 of reference 2. The JAF reactor vessel bottom-head consists of one 8" dome segment (dollar plate), six 8" plate side segments containing the lower meridianal welds (not examined) and eight 4 1/8" plate side segments containing the upper meridianal welds (examination performed).

Construction of the reactor vessel bottom-head includes two circumferential welds; VC-BH-2-3 (dome segment to lower side segment, not examined) and VC-BH-1-2 (lower side segments to upper side segments, examination performed). There are 14 meridianal welds 6 between the lower side segments (VV-BH-2a through f, not examined) and 8 between the upper side segments (VV-BH-1a through h, examination performed). RR-CRV-01 requests relief from examination of circumferential weld VC-BH-2-3 (dome segment to lower side segment (dollar plate weld)) and 6 meridianal welds VV-BH-2a through f (lower side segment welds). The head circumferential weld and the upper meridinal welds were examined.

Relief is being requested for the dollar plate weld and the lower meridinal welds. The vessel limiting conditions for examination identified in figures 2 through 7 are based on location, limited accessibility, and interferences. Only 2 of the 6 lower meridianal welds are located adjacent to the man way access holes. Examination of the welds was attempted in two outages with different vendors resulting in no coverage due to location and interferences.

The NRC Staff had previously identified that similar plants achieved coverage for the welds that are the subject of the JAF Relief Request. JAF engineering personnel contacted similar plants and found that the extent of coverage identified to the NRC is from outside of the skirt weld. JAF has identified coverage from outside of the skirt weld as "incidental coverage" and has not credited this coverage.

JAF engineering personnel contacted the EPRI personnel responsible for the Performance Demonstration Initiative (PDI) qualification of automated vessel weld inspection equipment. Based on the discussion with EPRI, no vendors are currently known to perform automated examinations in the lower head CRD region on BWR's

The vessel skirt area is opened for surface examination of CRD housing welds during the interval and accessible at the time to visual examination of the bottom head welds and CRD housings. In addition, VT-2 examinations are performed from the CRD platform to identify potential leakage from the CRD housings or areas above.

Approximately 64% of the total circumferential weld length and 64.8% of the total meridianal weld length (including incidental weld coverage) for the reactor vessel lower-head region is examined. The coverage achieved for the overall lower head provides reasonable assurance that degradation within the region would be identified.