

From: Vaidya, Bhalchandra
Sent: Friday, August 21, 2009 1:15 PM
To: 'Dorman, Eugene'; 'Pechacek, Joseph'
Cc: Salgado, Nancy; Pickett, Douglas; McHale, John; Tingen, Steve
Subject: ME1818 - DRAFT RAIs - Relief Request VRR-06

By letter dated July 31, 2009, Energy Nuclear Operations, Inc., the licensee, requested authorization to use an alternative to the in-service test requirements in the 2001 Edition with the 2002 and 2003 Addenda of the American Society of Mechanical Engineers *Code for Operation and Maintenance of Nuclear Power Plants*. The proposed alternative in Request VRR-06 is for the main steam safety relief valves and requests authorization to use alternative test requirements. The Component Performance and Testing Branch, Division of Component Integrity, Office of Nuclear Reactor Regulation has reviewed the licensee's submittal and has determined that following additional information is needed to complete its review.

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DRAFT REQUEST FOR ADDITIONAL INFORMATION
RELIEF REQUEST VRR-06
DOCKET NO. 50-333
TAC NO. ME1818

1. Request VRR-06 proposes not to exercise the main steam safety relief valves at reduced or normal system pressure following reinstallation in accordance with I-3410(d) of Mandatory Appendix I of the 2001 Edition with the 2002 and 2003 Addenda of the ASME OM Code. I-3410(d) was revised in the 2004 Edition of the ASME OM Code to not require that the main steam safety relief valves be exercised at reduced or normal system pressure following reinstallation. Please discuss if the proposed test of the main steam safety relief valves described in Request VRR-06 meets the requirements of I-3410(d) of Mandatory Appendix I of the 2004 Edition of the ASME OM Code.

2. Request VRR-06 also proposes to setpoint test the main steam safety relief valves every six years in accordance with Code Case OMN-17, "Alternative Rules for Testing ASME Class 1 Pressure Relief/Safety Valves." Code Case OMN-17 cannot be approved by the Nuclear Regulatory Commission until it is published by the ASME. Please resubmit Request VRR-06 without referencing Code Case OMN-17. The submittal should address all the provisions in Code Case OMN-17. The submittal should also address why it is a hardship or unusual difficulty without a compensating increase in the level of quality and safety to test the main steam safety relief valves every 5 years in accordance with I-1320(a) of Mandatory Appendix I of the ASME OM Code.

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Please let me know, if you need clarification of these RAIs. In either case, let me know when you can commit to provide the responses to these RAIs. Because of the forth-coming, linked amendment request, fast turn-around is preferable, so that the NRC staff can try to support the licensee's requested dates of completion.

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