

From: Walker, Philip [plwalker@STPEGS.COM]
Sent: Thursday, October 15, 2009 1:59 PM
To: Lyon, Fred; Harrison, Albon
Cc: Thadani, Mohan
Subject: RE: RAI for RR-ENG-2-53 (TAC Nos. ME2329-30)

Please see the responses given in bold below.

From: Lyon, Fred [mailto:Fred.Lyon@nrc.gov]
Sent: Thursday, October 15, 2009 9:50 AM
To: Harrison, Albon
Cc: Walker, Philip; Thadani, Mohan
Subject: RAI for RR-ENG-2-53 (TAC Nos. ME2329-30)

The staff reviewed the STP submittal dated 9/23/09 regarding relief request RR-ENG-2-53 and requests the following additional information.

1. In section 1 of Relief Request RR-ENG-2-53, the licensee referenced the ASME Code, 1995 edition, 1996 addenda. Please clarify whether or not the 1995 edition, 1996 addenda is the code of record for the current inspection interval. Also, please confirm that the current inspection interval is the second inspection interval.

The Code of Record for the second inspection interval is ASME Section XI 1989 No Addenda. The current inspection interval for STPNOC is the second inspection interval. Relief Request RR-ENG-2-22, approved on September 28, 2001, permitted the use of selected sections (Appendix I, Appendix VIII, and IWA-2300) of the 1995 Edition through the 1996 Addenda as alternative criteria for performing ultrasonic examinations and qualification of examination personnel to Performance Demonstration Initiative (PDI) requirements.

2. In Section 4, 2nd paragraph, of the relief request, the licensee stated that, "...In addition, ASME Section XI, 2004 Edition 2005 Addenda, Appendix I, Article I-2600(a) states that for components to which Appendix VIII is not applicable [Article I-2110(b)], examination procedures, personnel, and equipment qualified in accordance with Appendix VIII may be applied."

However, 10 CFR 50.55a(b)(2)(xv) requires that "...Licensees who use later editions and addenda than the 2001 edition of the ASME Code shall use the 2001 edition of Appendix VIII."

The NRC prohibits the use of Appendix VIII in ASME Code editions and addenda later than 2001. Therefore, the 2004 edition, 2005 addenda, Appendix I, cannot be applied/used.

In light of the above condition in 10 CFR 50.55a, please explain the second paragraph in Section 4 of relief request RR-ENG-2-53.

The reference to 2004 Edition 2005 Addenda, Appendix I, Article I-2600, was included to present the information that later edition and addenda of the Code have clarified the commitment to use the PDI approach for the Reactor Pressure Vessel (RPV) flange-to-shell weld. STPNOC's intent was not to apply the later edition/addenda to this relief, but to provide clarifying information. The justification for granting the relief, as stated in section 5, is that industry experience has shown that the Appendix VIII Performance

Demonstration Initiative (PDI) approach has demonstrated that for detection and characterization of flaws in the RPV, the UT examination techniques are equal to or surpass the requirements of the ASME Code, Section V, Article 4 UT examination requirements. This justification was based on approved relief requests from Seabrook Station and Donald C. Cook Nuclear Plant.

3. Provide the weld number for the RPV shell-to-flange weld.

The weld number for the RPV shell-to-flange weld is RPV1-101-121.

Please respond as soon as possible.

Thanks, Fred

E-mail Properties

Mail Envelope Properties (582CA7E05607F14F8D433C5CE43C030A017AF6BE0F)

Subject: RE: RAI for RR-ENG-2-53 (TAC Nos. ME2329-30)
Sent Date: 10/15/2009 1:59:36 PM
Received Date: 10/15/2009 1:59:36 PM
From: Walker, Philip

Created By: plwalker@STPEGS.COM

Recipients:

Fred.Lyon@nrc.gov (Lyon, Fred)
Tracking Status: None
awharrison@STPEGS.COM (Harrison, Albon)
Tracking Status: None
Mohan.Thadani@nrc.gov (Thadani, Mohan)
Tracking Status: None

Post Office:

exgmb2.CORP.STPEGS.NET

Files	Size	Date & Time
MESSAGE	14303	10/15/2009

Options

Expiration Date:
Priority: oImportanceNormal
ReplyRequested: False
Return Notification: False

Sensitivity: oNormal

Recipients received: