From: Kalyanam, Kaly
Sent: Tuesday, March 23, 2010 9:15 AM
To: MASON, MICHAEL E (WF3); STEELMAN, WILLIAM J
Cc: MURILLO, ROBERT J
Subject: Requests for Relief WF3-ISI-008 through 014 (TAC Nos. ME1426, 1427, 1428, 1429, 1430, 1431, 1432 and 1433

By letter dated June 1, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML091540088), Entergy Operations, Inc. (the licensee), submitted Requests for Relief, WF3-ISI-007, WF3-ISI-008, WF3-ISI-009, WF3-ISI-010, WF3-ISI-011, WF3-ISI-012, WF3-ISI-013 and WF3-ISI-014, from ASME Section XI Volumetric Examination Requirements - Second 10-Year Interval, for Waterford Steam Electric Station, Unit 3

The NRC staff has reviewed the application and has determined that additional information, as requested below, is needed to complete the review. The staff discussed the need for additional information on March 22 2010, with Mr. M. Mason and others of your staff. Mr. Mason agreed to provide a response on or before April 8, 2010.

If you have any questions, please call me at 301-415 1480.

N. Kalyanam

OFFICE OF NUCLEAR REACTOR REGULATION

REQUEST FOR ADDITIONAL INFORMATION

WATERFORD STEAM ELECTRIC STATION, UNIT 3

REQUESTS FOR RELIEF WF3-ISI-007, 008, 009, 010, 011, 012, 013 AND 014

DOCKET NO. 50-382

Applicable ASME Code Edition/Addenda

The ASME Code Edition/Addenda that was applied during the second ISI interval at WF-3 remains unclear. The original submittal lists the 1992E/93A as the Code of record, but also states that WF-3 used the 1980E/W81A for ultrasonic examinations. In a response to the second NRC RAI, the licensee stated:

The NRC authorized Waterford 3 (Reference GNRI 96-00244) to perform ultrasonic examinations in accordance with the 1980 Edition with the Winter of 1981 Addenda as specified in the ISI plan for the first interval. The use of the 1980 Edition with the Winter of 1981 Addenda

was limited until such time when changes to 10 CFR 50.55a required the use of ASME Section XI, Appendix VIII.

Surface Examinations

- The licensee received approval to use ASME Code Case N-663 (ML032390190 – August 26, 2003) which allows foregoing of required surface examinations after an evaluation for OD surface degradation is completed. For examination categories B-F, B-J, and C-F-1, the licensee may have performed some of the ISI examinations prior to this approval, and appears that the licensee did not perform the Code-required surface examinations at that time. The licensee needs to discuss this issue and confirm whether the required surface examinations were performed. The licensee should also confirm whether the examination dates provided in the specific RAI response (February 8, 2010), are correct and apply only to the volumetric examinations.

- RR WF3-ISI-010: ASME 1992E/93A, B-J Examination Category, Item B9.21, only requires surface examination on circumferential welds less than NPS 4-inch. The licensee performed a surface examination (liquid penetrant) on drain nozzle-to-safe end Weld 15-006. However, it appears the licensee is requesting relief for the volumetric examination of Weld 15-006, which is not required by the Code. Please confirm that volumetric examination is not required for Weld 15-006, and clarify the specific relief that is being requested.

- RR WF3-ISI-012: For Examination Category C-B, Item C2.21, the date of volumetric examination for nozzle-to-top head dome Weld 04-030 was listed as April 30, 2005. However, the licensee stated that the ASME Code-required surface examination was missed, and this discrepancy was documented in a corrective action letter, CR-WF3-2010-0352. Please explain why the required surface examination was missed, whether the NRC was notified, and if so, provide a reference and accession number for this notification. In addition, state when the next scheduled surface examination will be made for the subject weld.

Application of ASME Appendix VIII

- For Examination Category B-F welds included in RR WF3-ISI-009, the licensee's submittal dated June 1, 2009, states that Appendix VIII procedures, personnel and equipment were used. However, in the specific RAI response dated February 8, 2010, the subject welds examinations show using ASME requirements at the time of the examination (November 5 and 6, 2000), which were not Appendix VIII-based. Please confirm the examination dates and the ASME Code requirements used to perform the volumetric examinations on the subject Class 1 dissimilar metal welds.

- For Examination Category C-A welds in RR WF3-ISI-011, the licensee's submittal letter dated June 1, 2009, references "Class 1 piping….," which doesn't apply to the subject Class 2 welds (see Table 4 below). In addition, the licensee submittal states that the subject welds were examined after November 22, 2002, hence Appendix VIII-based methods were used. However, the examination dates provided in the specific RAI response dated February 8, 2010, don't agree with the original licensee submittal. It is noted that Appendix VIII requirements do not apply for any of these welds. Please clarify the dates and requirements used to perform the subject Class 2 weld examinations listed in Table 1.

Table 1 - Examination Category C-A				
Code Item	**Weld Identifier**	**Weld Type**	**ASME Coverage Obtained**	**Examination Date**
C1.10	04-026	SG Intermediate Shell to Conical Shell Weld	56%	3/03/1999
C1.20	04-029	SG#2 Top Head Torus to Top Head Dome Weld	89%	4/29/2005
C1.20	54-074	Shut Down Heat Exchanger Shell to Flange Weld	88%	9/04/2007
C1.20	54-075	Shut Down Heat Exchanger Shell to Flange Weld	85%	9/04/2007

- Similarly, for Examination Category C-B Weld 04-030 in RR WF3-ISI-012, the licensee's submittal letter dated June 1, 2009, references "Class 1 piping….," which doesn't apply to the subject Class 2 weld. In addition, the licensee submittal states that the subject weld was examined after November 22, 2002, hence Appendix VIII-based methods were used. However, the examination date of April 30, 2005, provided in the specific RAI response dated February 8, 2010, does not agree with the original licensee submittal. It is noted that Appendix VIII requirements do not apply for this weld. Please clarify the dates and requirements used to perform the subject Class 2 Weld 04-030 examination listed.

- Similarly, in RR WF3-ISI-013 for Examination Category C-F-1 piping welds, the licensee's original submittal states examinations for these welds used Appendix VIII. However, the examination date and requirements provided in the specific RAI response, provides an examination date of March 2, 1999 for Weld 55-051. Please clarify the date and requirements used to perform the subject Class 2 piping weld examination.

Miscellaneous Items

- In RR WF3-ISI-013, for Examination Category C-F-1 piping welds, the licensee submittal and RAI response, dated June 1, 2009 and February 8, 2010, respectively, show a weld identification number as being 56-043. However, the initial RAI response, dated November 6, 2009, appears to show this as weld identification number of 54-043. Please clarify the correct weld identification number for the subject Class 2 piping weld.
    - The scan angles used to perform the ultrasonic examinations for Weld 56-043 vary between values listed in the RAI response tables and those shown on the sketch. Please confirm the ultrasonic scan angles used to perform the volumetric examinations on Weld 56-043.

- RR WF3-ISI-014: Even though this request for relief for Examination Category R-A, Risk-Informed Piping Examinations, was withdrawn by the licensee in the specific RAI response dated February 8, 2010, it should be noted that piping Weld 21-0004, listed in the initial RAI response dated November 6, 2009, was not included in the licensee's submittal.

E-mail Properties

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