

From: Chawla, Mahesh
Sent: Tuesday, April 27, 2010 2:45 PM
To: Alan I Hassoun
Cc: Andruszkiewicz, Edward; Fairbanks, Carolyn; Mitchell, Matthew
Subject: Fermi 2 - RR A37 - ME3117 - Alternative Requirements for Examination of BWR Nozzle Inner Radius /Nozzle to Shell Welds - Third Ten-year Interval

The Nuclear Regulatory Commission (NRC) staff has reviewed the information provided by Detroit Edison (the licensee) for Fermi Unit 2 in its letter dated January 20, 2010, and has determined that additional information is necessary to complete the review of Relief Request No. RR-A37. Based on the staff's review, please provide a response which addresses the following request for additional information (RAI) questions. Please arrange a teleconference with the NRC Staff to discuss the following:

1. In the December 19, 2007 letter from Matthew A. Mitchell to Rick Libra, BWRVIP Chairman, in reference to the "Safety Evaluation Of Proprietary EPRI Report, "BWR Vessel And Internals Project, Technical Basis For The Reduction Of Inspection Requirements For The Boiling Water Reactor Nozzle-To-Vessel Shell Welds And Nozzle Inner Radius (BWRVIP-108)," in the first paragraph in section, "5.0 PLANT-SPECIFIC APPLICABILITY" it states,

"Licensees who plan to request relief from the ASME Code, Section XI requirements for RPV nozzle-to-vessel shell welds and nozzle inner radius sections may reference the BWRVIP-108 report as the technical basis for the use of ASME Code Case N-702 as an alternative. However, each licensee should demonstrate the plant-specific applicability of the BWRVIP-108 report to their units in the relief request by showing that all the following general and nozzle-specific criteria are satisfied..."

The Licensee has not requested the use of ASME Code Case N-702 as an alternative. Please explain this discrepancy since relief can only be granted for the use of ASME Code Case N-702 using the BWRVIP-108 report as the technical basis for the use of ASME Code Case N-702.

2. The fourth sentence in the first paragraph of Section 5 "Proposed Alternative and Basis for Relief" of Relief Request RR-A37 states,

"The alternative requirements will be applied to the control rod drive return nozzle which has been cut and capped at Fermi 2 and therefore is not subject to the thermal fatigue issues which might otherwise be a concern for operational control rod drive return lines."

Whereas, ASME Code Case N-702, states in part, "This Case excludes BWR feedwater nozzles and control rod drive return line nozzles."

In order to expand the scope of ASME Code Case N-702 to include capped control rod drive return line nozzles in your application you need to provide an analysis as extensive as the one performed in BWRVIP-108, considering all stresses, including the reduced thermal fatigue stresses and using assumptions relevant to this line . Alternatively, you may remove this item from the request.

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