

From: Sreenivas, V
Sent: Tuesday, June 01, 2010 11:56 AM
To: Thorpe, April
Cc: Lingam, Siva; Cotton, Karen; Kulesa, Gloria
Subject: FW: NAPS Unit 2, Request for Information: Fourth Interval Inservice Inspection Plan and Associated Proposed Alternatives and Relief Requests-ME3317

April: please place this RAI in ADAMS, immediately available for public.

Siva/Karl: Please enter today's date for RAI issued to licensee for ME3317. Thank you -V

From: Sreenivas, V
Sent: Tuesday, June 01, 2010 11:51 AM
To: 'david.heacock@dom.com'
Cc: 'Tom Shaub'; 'david.sommers@dom.com'; Kulesa, Gloria; Bedi, Gurjendra
Subject: NAPS Unit 2, Request for Information: Fourth Interval Inservice Inspection Plan and Associated Proposed Alternatives and Relief Requests-ME3317

REQUEST FOR ADDITIONAL INFORMATION (RAI)

This e-mail is in reference to Virginia Electric and Power Company (Dominion), North Anna Power Station (NAPS) Unit 2, Fourth Interval Inservice Inspection Plan and Associated Proposed Alternatives and Relief Requests, Docket 50-339, letter dated February 1, 2010 (ML100330125).

The U.S. Nuclear Regulatory Commission (NRC) staff needs the following additional information to complete its review. These RAIs are applicable to snubber inservice inspection and testing.

RAI 1: The submitted Relief Request, Section 4, Reason for Request, page 3-7, Visual Inspection, third paragraph states "Historically, the number of unacceptable visual snubber inspections at NAPS Unit 2 is one or less and based on the snubber population, the current inspection interval is 48 months (every other refueling outage). Please explain

- (1) What is the meaning of less than one unacceptable snubber during visual inspection (snubber inspection cannot be counted less than one)?
- (2) What method of categorizing (small bore, large bore or combined one population) snubbers is being used while performing visual inspections at NAPS 2?

RAI 2: OM Part 4 requires NAPS 2 to use a 10% test plan, 37 snubber test plan or 55 snubber test plan. In the submitted relief request, NAPS 2 uses two different sampling plans (1) one for small bore; and (2) another for large bore snubbers. Please explain the reason and basis for using two different and separate test sampling plans for small and large bore snubbers.

RAI 3: TRM page 3.7.5-5, second paragraph, fifth line, states "If the failure is determined to be generic, an additional 10% of that type of snubber shall be functionally tested. If the failure is determined to be non-generic, an additional 10% of that type snubber will be tested during the next functional test period." Please explain the following:

- a. Provide details about “generic” and “non-generic” failures, and provide the section number of the OM-4 Code, which is being used for this requirement.
- b. Define “functional test period,” and provide justification to delay the required additional testing to the next functional test period. (Note: the Code requires that additional functional testing to be performed in the same period/interval.)

RAI 4: OM-4, Paragraph 3.2.4.2, “Test Failure Mode Group,” states that unacceptable snubber(s) shall be categorized into failure mode group(s). A test failure mode group(s) shall include all unacceptable snubbers that have a given failure mode, and all other snubbers subject to the same failure mode. Please explain whether and how these requirements will be met by using Technical Requirement Manual (TRM) 3.7.5.

RAI 5: The submitted Relief Request, Section 4, Reason for Request, page 3-6, second line states “The existing TRM test and examination requirements meet the intent of ASME OM Part 4 and provide an acceptable level of quality and safety.” However, this Relief Request, Section 5, Proposed Alternative and Basis for Use, page 3-13, third paragraph states “No other requirements of OM Part 4 will be implemented as part of this alternative for snubber inservice inspection and testing. Please explain and clarify why Section 5 of this relief request states that “No other requirements of OM Part 4 will be implemented,” when Section 4 states that the existing TRM meets the intent of OM Part 4.

Please submit the docketed response to these RAI's by June 30, 2010. If you have any questions, please me at 301-415-2597.

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