



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 13, 2010

Mr. George H. Gellrich, Vice President
Calvert Cliffs Nuclear Power Plant, LLC
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, MD 20657-4702

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION RE: AMERICAN SOCIETY OF
MECHANICAL ENGINEERS CODE REQUIRED WELD INSPECTIONS RELIEF
REQUESTS - CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1
AND 2 - (TAC NOS. ME4220 THROUGH ME4223)

Dear Mr. Gellrich:

By letter dated June 30, 2010 (Agencywide Document Access Management System (ADAMS) Accession No. ML101930245), Calvert Cliffs Nuclear Power Plant, LLC, the licensee, submitted Relief Requests ISI-24, ISI-25, ISI-26, and ISI-27 from the performance of selected American Society of Mechanical Engineers Boiler and Pressure Vessel Code required weld inspections.

Based upon the Nuclear Regulatory Commission staff review, additional information will be necessary for the staff to complete its review. Enclosed is the staff's request for additional information (RAI). Based on discussions with your staff, we understand that you plan to respond to the enclosed RAI within 60 days of the date of this letter.

Please contact me at 301-415-1364 if you have any questions.

Sincerely,

A handwritten signature in cursive script, reading "Richard V. Pickett for," is written above the typed name.

Douglas V. Pickett, Senior Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-317 and 50-318

Enclosure:
As stated

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION (RAI)

REQUESTS FOR RELIEF ISI-24, ISI-25, ISI-26, AND ISI-27

CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2

THIRD 10-YEAR INSERVICE INSPECTION INTERVAL

DOCKET NOS. 50-317 AND 50-318

By letter dated June 30, 2010, Calvert Cliffs Nuclear Power Plant, LLC (the licensee) submitted Requests for Relief ISI-24, ISI-25, ISI-26, and ISI-27, from the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, for Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2 (Calvert Cliffs). Specifically, the ASME Code requires that 100 percent of the examination volumes, or surface areas, described in Tables IWB-2500 and IWC-2500 be performed during each interval. Licensee adopted Code of Record is the 1998 Edition of ASME Code, Section XI, No Addenda. The request for relief is for the third 10-year inservice inspection (ISI) interval for both units, which began July 1, 1999, and ended October 9, 2009.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(g)(5)(iii), the licensee has submitted the subject requests for relief for limited examinations in multiple ASME Code Examination Categories. 10 CFR 50.55a(g)(5)(iii) states that when licensees determine that conformance with ASME Code requirements is impractical at their facility, they shall submit information to support this determination. The NRC has reviewed the information submitted by the licensee and determined the following information is required to complete the evaluation.

General – Additional Information Required on All Requests for Relief

The licensee has provided only general, and somewhat vague, information regarding impracticality of obtaining ASME Code-required volumetric examinations. Statements such as “physical barriers and scanning surface,” “component configurations,” or “curvature/taper,” are inadequate to describe the bases for not obtaining the ASME Code-required examination volumes. No sketches with dimensional information showing the causes of limited accessibility have been included.

1. Please provide detailed and specific information to support the bases for limited examination in all requests for relief, and therefore, demonstrate impracticality.
 - a) Include detailed descriptions (written and/or sketches, as necessary) of the interferences affecting non-destructive examination (NDE) techniques.

Enclosure

- c) As applicable, describe NDE equipment (ultrasonic scanning apparatus), details of the listed obstructions (size, shape, proximity to the weld, etc.) to demonstrate accessibility limitations, and discuss whether alternative methods or advanced technologies could be employed to maximize ASME Code coverage.
 - d) Fully clarify the wave mode(s) and insonification angles used for all ultrasonic examinations.
 - e) Provide cross-sectional coverage plots to describe ASME Code volumes and transducer angles used during the examination.
2. It is unclear whether the licensee used the appropriate ASME Code requirements for the examinations. In Section 4 under the individual component descriptions of Attachments 1 through 4, the licensee stated that for all examination categories contained in the requests for relief, the NDE techniques and procedures incorporated (or were similar to) examination techniques qualified under Appendix VIII. In Section 6, Paragraph 3 of Attachments 1 through 4, the licensee claimed that ultrasonic procedures complied with the requirements of ASME Section V, Article 4 and the personnel were qualified in accordance with ASME Code Section XI, Appendix VII. Please identify the ASME Code requirements for procedure, equipment, and personnel qualifications used for examination of the subject welds.
3. Please state the actual ASME Code section that was followed for each Examination Category. If Appendix VIII-qualified techniques were applied to Examination Categories B-D, C-A, and C-B, please discuss whether this alternative was approved by NRC.

Additional Information Required for Requests for Relief ISI-24, ISI-25, ISI-26, and ISI-27, Examination Category R-A, Items R1.11, R1.16, and R1.20, Risk Informed Piping Examinations (Units 1 and 2)

4. In addition to the specific information requested in RAI-1 above, discuss whether alternate welds could have been examined to address the reduced volumetric coverage resulting from the limited examinations of the subject welds.

October 13, 2010

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Sincerely,

Richard Guzman /RA/ for
Douglas V. Pickett, Senior Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

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