

Stamm, Eric

From: Franke, Mark -R2
Sent: Wednesday, August 26, 2009 11:10 AM
To: Michel, Eric
Subject: Re: OCO leakage

I agree

This email is being sent from an NRC Blackberry device.

From: Michel, Eric
To: Franke, Mark
Cc: Riggs, Eric; Chan, Terence; Tsao, John; Stang, John
Sent: Wed Aug 26 10:59:41 2009
Subject: RE: OCO leakage

Mark,

I'm good on the operability portion of this issue. My question is related to the Code repair of the flaw.

The licensee will submit for relief; they've stated so on the phone, and it's stated in 9900 C.12 if conducting a non-code repair. In submitting for relief they must demonstrate that conducting a Code repair is "impractical." My reading of "impractical" in GL 90-05 is that the plant must be shut down to conduct the repair. Here's where I'm getting that from:

"A code repair is required to restore the structural integrity of flawed ASME Code piping, independent of the operational mode of the plant when the flaw is detected. Those repairs not in compliance with Section XI of the ASEM Code are non-code repairs. However, the required code repair may be impractical for a flaw detected during plant operation unless the facility is shut down."

Maybe I'm reading GL 90-05 wrong, but if the repair can be done while the plant is online, NRR may not accept the impracticality argument in their relief request. We may want to have that discussion with the licensee now, rather than later.

Eric

From: Franke, Mark
Sent: Wednesday, August 26, 2009 8:53 AM
To: Michel, Eric
Subject: Re: OCO leakage

We go back to definition of operability. Its actually the sro's call in the end. Though we view reasonable assurance as a high standard and they need to be consistent with their own procedure. At some point they could make a determination of operable but degraded or nonconforming and we'd be interested in looking at that if it goes that way. This is particularly true if they are not consistent with our TG

This email is being sent from an NRC Blackberry device.

From: Michel, Eric
To: Franke, Mark
Cc: Chan, Terence; Tsao, John; Stang, John

B/S

Sent: Wed Aug 26 08:23:54 2009
Subject: OCO leakage

Mark,

I found a paragraph in the 9900 guidance (C.12, Operational Leakage) that covers OCO's situation, and am satisfied they're using GL 90-05 correctly *for the operability determination*.

To evaluate the structural integrity of the leaking component, the licensee may use the criteria in Section XI of the ASME Code, the construction code, or any applicable ASME Code Case approved by the NRC. In addition, the licensee may evaluate the structural integrity of Class 3 piping by evaluating the flaw using the criteria of paragraph C.3.a of Enclosure 1 to GL 90-05. If the flaw meets the GL 90-05 criteria, the piping is degraded but operable. However, relief from ASME Code requirements is needed even if the structural integrity is found acceptable when applying GL 90-05. Whenever a flaw is through-wall in an ASME Code component when evaluated using GL 90-05, a relief request needs to be submitted in a timely manner after completing the operability determination process documentation and prior to implementing a non-code repair/replacement activity to the SSC.

This allows the use of a specific paragraph of GL 90-05, so there doesn't seem to be a need to consider the 90-05 introduction.

While this appears to be acceptable use of the GL for determining operability for operational leakage, the licensee is still in Code space, and must submit for relief prior to implementing a non-code repair. In this situation (i.e. dealing with the repair), OCO must show impracticality IAW 50.55a(g)(6)(i). I believe this is where the shut down comment is applicable. In other words, the GL seems to imply that the requirement to conduct the repair shut down is instrumental in demonstrating impracticality in the relief request.

I'm not sure where we draw the line between conducting the PDO, and instituting the non-code repair. Leaving the pipe as is, for an extended length of time, is essentially conducting a non-code repair. At what point would OCO be required to demonstrate the impracticality that wasn't required for the PDO?

Eric