

Stamm, Eric

From: Michel, Eric -R2
Sent: Thursday, August 27, 2009 6:51 AM
To: Chan, Terence; Franke, Mark
Cc: Tsao, John; Stang, John
Subject: RE: OCO leakage

Ok, thanks Terence.

Eric

From: Chan, Terence
Sent: Wednesday, August 26, 2009 7:00 PM
To: Michel, Eric; Franke, Mark
Cc: Tsao, John; Stang, John
Subject: RE: OCO leakage

It shouldn't be too hard for them to demonstrate impracticality now. I believe the GL basically indicated the staff's belief that plant shutdown to fix a pinhole leak in a SW line was impractical, considering the risks involved in shutdown evolutions, etc.

From: Michel, Eric
Sent: Wednesday, August 26, 2009 7:24 AM
To: Franke, Mark
Cc: Chan, Terence; Tsao, John; Stang, John
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

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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