SeabrookNPEm Resource

From: Plasse, Richard
Sent: Wednesday, February 23, 2011 12:20 PM
To: Cliche, Richard
Subject: draft RAI
Attachments: Seabrook AMR RAI 3.4.2.1.a NA SRP 37-2 Alley 2011-02-08.doc

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Subject: draft RAI
Sent Date: 2/23/2011 12:19:35 PM
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From: Plasse, Richard

Created By: Richard.Plasse@nrc.gov

Recipients:
"Cliche, Richard" <Richard.Cliche@fpl.com>
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MESSAGE	3	2/23/2011 12:19:00 PM	
Seabrook AMR RAI 3.4.2.1.a NA SRP 37-2 Alley 2011-02-08.doc			30718

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Request for Additional Information (RAI 3.4.1-37-2)

Background

By letter dated January 5, 2011, the staff issued RAI 3.4.1-37-1. This RAI requested that information as follows: a) propose to manage aging of these components using water chemistry and an appropriate verification AMP as indicated by the GALL Report for the management of aging in a secondary feedwater/steam environment or justify why the use of a verification AMP is either inconsistent with the GALL Report or technically unnecessary; b) justify why is it unnecessary to consider both the aging effects "loss of material" and "cracking" for each of the components under consideration; c) classify the steam generator feedwater inlet ring (J tube) and the steam generator tubes as steam generator components (making the appropriate verification AMP the Steam Generator Tube Integrity program) or justify why these components should be considered piping, piping components, or piping elements as proposed by item 3.4.1-37. The applicant responded to this RAI by letter dated February 3, 2011. With one potential exception, the staff found these responses acceptable.

Issue

In its response to the previous RAI, the applicant reclassified the steam generator feedwater nozzle (thermal sleeve) and the orifice from being consistent with SRP-LR Table 3.4.1-34 (generic note A) to being inconsistent with the GALL Report (generic note H). The applicant also proposed to manage the aging of these components through the use of its Water Chemistry Program. Based on its review, it appears to the staff that the components, materials, environments, and aging effects under consideration are described by SRP-LR Table 3.4-1 ID 84. The staff notes that SRP-LR Table 3.4-1 ID 84 recommends that aging be managed through the use of GALL Report AMP XI.M2, Water Chemistry and either AMP XI.M32, One Time Inspection, or AMP XI.M1, ASME Section XI, Inservice Inspection.

The staff notes that, in its response to the previous RAI, the applicant stated that these components were not available for inspection. The staff also notes that these components have been addressed in many recent License Renewal SER's. While there have been differences in the approaches to the management of aging of these components from plant to plant, in each case the SER indicates that the accepted method of aging management involves the use of an AMP to manage water chemistry and an AMP to perform at least a one-time inspection to verify the efficacy of the water chemistry program. This indicates to the staff that water chemistry and inspection programs are necessary for adequate aging management and that these components are generally inspectable.

Request

Please: a) demonstrate why the aging management guidance provided by SRP LR Table 3.4-1 ID 84 need not be followed; or, b) demonstrate why the components under consideration are

inspectable at other plants and not at the applicant's plant; or c) propose to manage aging of these components in a manner consistent with or equivalent to SRP LR Table 3.4-1 ID 84.