

**From:** Singal, Balwant  
**Sent:** Thursday, February 02, 2012 2:24 PM  
**To:** Harrison, Albon  
**Cc:** Walker, Philip  
**Subject:** Request for Additional Information (RAI) - RR-ENG-3-04 - TACs ME7055 and ME7056

The U.S. Nuclear Regulatory Commission (NRC) staff's Piping and NDE Branch (EPNB) has reviewed your application dated September 1, 2011 (Agencywide Documents Access and Management System (ADAMS), Accession No. ML11250A170) for Relief Request (RR) RR-ENG-3-04 and requires the following additional information to complete its review.

1. Please state if the augmented inspection program for high energy break exclusion zone piping remain unaffected by the 3<sup>rd</sup> Interval risk-informed inservice inspection (RI-ISI) program?
2. The NRC issued rulemaking on June 21, 2011 which requires licensees to follow an augmented inservice inspection program in accordance with American Society of Mechanical Engineers (ASME) Code Case N-770-1, "Alternative Examination Requirements and Acceptance Standards for Class 1 PWR [Pressurized Water Reactors] Piping and Vessel Nozzle Butt Welds Fabricated With UNS N06082 or UNS W86182 Weld Filler Material With or Without Application of Listed Mitigation Activities," and limitations listed in Title 10 of Code of Federal Regulations (10 CFR), Paragraph 50.55a(g)(6)(ii)(F). In addition, the NRC held a public meeting to discuss the June rulemaking and the implementation of Code Case N-770-1 on July 12, 2011. Agencywide Document Access and Management System (ADAMS) Accession No. ML112240818 documents the NRC summary of that meeting. Please state how will STP Nuclear Operating Company (STPNOC) address the requirements of the June 2011 rulemaking and ASME Code Case N-770-1 in implementing RR RR-ENG-3-04?
3. The original RI-ISI program required inclusion of 10% of the ASME Class 1 piping non-socket welds. Is this requirement met by the 3<sup>rd</sup> interval RI-ISI program? Tables 3 and 4 do not identify any piping classes or ASME Section XI code categories making it impossible for the NRC staff to determine if this requirement was retained. Please provide details to facilitate NRC staff review.
4. Starting on the bottom of Page 1 of the attachment to your September 1, 2011 submittal, there is a discussion of how review of the program led to the following changes and discusses 1) a change in the exemption size for auxiliary feedwater piping from the 1989 code to the 2004 code, 2) revised Probabilistic Risk Assessment Licensing Branch (PRA) model and 3) repair/replacement activities which modified the piping arrangements. In reviewing Tables 3 and 4, the NRC staff noted a significant change in the number of welds from the original program to the 3<sup>rd</sup> interval RI-ISI program. Please modify Tables 3 and 4 to indicate the reason for the change in the number of welds (e.g. code change, revised PRA, repair/replacement, etc.) to facilitate NRC review of the 3<sup>rd</sup> interval RI-ISI program.

The RAI was transmitted via e-mail on January 23, 2012 and Mr. Phil Walker of STPNOC informed us on February 2 that no clarification call is needed. You are requested to provide

your response within 30 days from the date of this e-mail. Please treat this e-mail as formal request.

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