

LimerickNPEm Resource

From: Kuntz, Robert
Sent: Wednesday, May 30, 2012 11:22 AM
To: Christopher.Wilson2@exeloncorp.com
Cc: Anthony Z. Roisman; gfettus@nrdc.org; Smith, Maxwell; Kanatas, Catherine
Subject: DRAFT Request for Information RE: Limerick Generating Station license renewal application
Attachments: DRAFT RAI RE LGS LRA IWF program bolting.docx

Chris,

Attached is a DRAFT Request for Information that the NRC staff is preparing to issue related to the Limerick Generating Station license renewal application. If Exelon would like clarification on the attached let me know and I will arrange a teleconference with the staff.

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Options

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LIMERICK GENERATING STATION
LICENSE RENEWAL APPLICATION
DRAFT REQUESTS FOR ADDITIONAL INFORMATION

DRAI B.2.1.32-2.1

Background

The Limerick Generating Station (LGS) license renewal application (LRA) section B.2.1.32 states that the ASME Section XI, Subsection IWF program, with enhancement, will be consistent with GALL Report AMP XI.S3. The response to RAI B.2.1.32-2, provided by letter dated February 28, 2012, stated that there are no ASTM A325, F1852, or A490 bolts within the scope of the ASME Section XI, Subsection IWF program. Therefore, the response stated that the GALL Report recommended preventive actions in Section 2 of Research Council for Structural Connections (RCSC) publication "Specification for Structural Joints Using ASTM A325 or A490 Bolts" do not apply.

The response to RAI 3.5.2.1.1-1, provided by letter dated February 16, 2012, regarded stress corrosion cracking (SCC) in high strength bolts. The response stated that A325 or A490 bolts are used for high strength structural bolts and that structural bolting is within the scope of license renewal and is managed by the Structures Monitoring Program. The response further stated that SCC potential need not be evaluated for these bolts based on guidance in SRP-LR Table 3.5-1, ID 69.

Issue

The staff agrees that SCC potential need not be evaluated for ASTM A325 and A490 structural bolts; however, the preventive actions discussed in Section 2 of RCSC publication "Specification for Structural Joints Using ASTM A325 or A490 Bolts," should still be addressed if A325 or A490 bolts are in the scope of a program.

The staff reviewed Table 3.9-6, "Loading Combinations, Stress Limits, and Allowable Stresses," in the LGS UFSAR and noted several components which appear to be within the scope of ASME Section XI, Subsection IWF that either called out SA325 bolts, which are equivalent to ASTM A325 bolts, or referenced ASME Division III, Subsection NF, which allows the use of SA325 bolts. It appears to the staff that there may be a discrepancy between the information in the UFSAR, and the information provided in the response to RAI B.2.1.32-2. The UFSAR appears to allow the use of SA325 bolts, and in at least one instance calls out SA325 bolts, while the RAI B.2.1.32-2 response claims there are no ASTM A325 bolts within the scope of the program. Based on the information in the UFSAR, along with the RAI responses, it is not clear to that staff whether or not there are A325 or A490 bolts within the scope of the ASME Section XI, Subsection IWF program.

Request

Verify that there are no ASTM A325, F1852, or A490, or ASME equivalent, bolts in the scope of the ASME Section XI, Subsection IWF program. If there are no ASTM A325, F1852, or A490 bolts within the scope of the program, explain the discrepancy in the UFSAR. If the bolts are within the scope of the ASME Section XI, Subsection IWF program, explain how the preventive

actions discussed in Section 2 of “Specification for Structural Joints Using ASTM A325 or A490 Bolts” are addressed, or why they are unnecessary. If ASTM A325, F1852, or A490 bolts typically within the scope of ASME Section XI, Subsection IWF program are being managed by a different program (e.g. Structures Monitoring) explain how that program addresses the recommendations of the GALL Report ASME Section XI, Subsection IWF program.