

NRR-PMDAPEm Resource

From: Feintuch, Karl
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To: Jack Gadzala; 'Craig D Sly'
Cc: Cheruvenki, Ganesh
Subject: ME7727 - Kewaunee - Draft Request for Additional Information Re: RVI components
Inspection Plan - RAII-Cher-021 to -022
Attachments: ME7727 RAII-Cher-021 to -022 TLAA.docx

Attached are two Request For Additional Information items (RAII) pertaining to the NRC review of the subject Inspection plan. Please review for clarification and to confirm a schedule for response.

Karl Feintuch
USNRC
301-415-3079

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From: Feintuch, Karl

Created By: Karl.Feintuch@nrc.gov

Recipients:
"Cheruvenci, Ganesh" <Ganesh.Cheruvenci@nrc.gov>
Tracking Status: None
"Jack Gadzala" <jack.gadzala@dom.com>
Tracking Status: None
"Craig D Sly" <craig.d.sly@dom.com>
Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

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REQUEST FOR ADDITIONAL INFORMATION (RAI)
RELATED TO LICENSEE'S REACTOR VESSEL INTERNALS INSPECTION
PLAN REVIEW REQUEST
KEWAUNEE POWER STATION (TAC NO. ME7727)
DOCKET NO. 50-305
August 21, 2012

Requirement-

Item 5 in Action Item 8 of the NRC staff's Safety Evaluation (SE), Revision 1 (dated December 16, 2011) for the MRP-227 addresses the fatigue evaluation of the reactor vessel internals (RVI) components which is described below:

1. Pursuant to 10 CFR 54.21(c)(1), the applicant is required to identify all analyses in the current licensing bases (CLB) for their RVI components that conform to the definition of a time limited aging analysis (TLAA) in 10 CFR 54.3 and shall identify these analyses as TLAA's for the application in accordance with the TLAA identification requirement in 10 CFR 54.21(c)(1). MRP-227, as approved by the NRC, does not specifically address the resolution of TLAA's that may apply to applicant/licensee RVI components. Hence, applicants/licensees who implement MRP-227, as approved by the NRC, shall still evaluate the CLB for their facilities to determine if they have plant-specific TLAA's that shall be addressed. If so, the applicant's/licensee's TLAA shall be submitted for NRC review along with the applicant's/licensee's application to implement the NRC-approved version of MRP-227.
2. For those cumulative usage factor (CUF) analyses that are TLAA's, the applicant may use the PWR Vessel Internals Program (PWRVIP) as the basis for accepting these CUF analyses in accordance with 10 CFR 54.21(c)(1)(iii) only if the RVI components in the CUF analyses are periodically inspected for fatigue-induced cracking in the components during the period of extended operation. The periodicity of the inspections of these components shall be justified to be adequate to resolve the TLAA. Otherwise, acceptance of these TLAA's shall be done in accordance with either 10 CFR 54.21(c)(1)(i) or (ii), or in accordance with 10 CFR 54.21(c)(1)(iii) using the applicant's program that corresponds to NUREG-1801, Revision 2, AMP X.M1, "Metal Fatigue of Reactor Coolant Pressure Boundary Program". To satisfy the evaluation requirements of ASME Code, Section III, Subsection NG-2160 and NG-3121, the existing fatigue CUF analyses should include the effects of the reactor coolant system water environment.

Request for Additional Information Items-

The NRC staff requests that the licensee answer the following RAI items (RAII), which are related to fatigue analysis as part of TLAA.

ME7727-RAII-EVIB-Cher-021-2012-08-21

Table 4.3-2 of the KPS USAR, Revision 23, states that cumulative usage factor (CUF) analyses were performed on the core support guide at KPS. The NRC staff requests that the licensee confirm the following information: (1) CUF factor (0.204) listed in Table 4.3-2 is valid for the extended period of operation, and, (2) if the existing CUF analyses for the core support guide include the effects of the reactor coolant system water environment.

ME7727-RAII-EVIB-Cher-022-2012-08-21

The licensee is requested to confirm that there is no other TLAA evaluation performed on any other RVI components at Kewaunee Power Station (KPS).