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|---|---|
| **From:** | Kalyanam, Kaly |
| **To:** | CLARK, ROBERT W |
| **Cc:** | Lent, Susan; Burkhardt, Janet |
| **Subject:** | Acceptance Review Result to Entergy - on RR No. ANO2-ISI-o15 (TAC No. ME0951) |
| **Date:** | Tuesday, April 02, 2013 10:05:24 AM |

Susan

When you get a chance, could you please include this email in ADAMS?

Thanks

Kaly

The SUNSI information as follows:
Plant: Arkansas Nuclear One, Unit 2
Docket No.: 50/368
Subject: RAI on Request for Relief No. ANO2-ISI-015
TAC No.: MF0941
SUNSI Review Done: Yes. Publicly Available, Normal Release, Non-sensitive,
From: R. Clark
To: N. Kalyanam

To: R. Clark
Entergy Operations Inc.
Arkansas Nuclear One, Units 1 and 2

From: N. Kalyanam
NRR/DORL/LPL4

By letter dated March 1, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML12063A538), Entergy (the licensee) submitted Request for Relief (RR) No. ANO2-ISI-015, from the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, for Arkansas Nuclear One, Unit 2 (ANO, Unit 2). The relief pertains to the period pressure testing requirements for ANO-2 reactor vessel flange seal leak detection piping.

Entergy has determined that the required pressure test requirements are impractical due to the configuration and design of the system, and compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. The proposed alternative is based on ASME Code Case N-805, “Alternative to Class 1 Extended Boundary End of Interval or Class 2 System Leakage Testing of Reactor Vessel Flange O-ring Leak

Detection System".

Entergy also stated that during the next ANO-2 refueling outage (2R23), when the alternative examination method could be performed, will occur in Spring 2014 (fourth ISI 10-year interval, second period). Entergy plans to credit the 2R22 examination of the reactor flange seal leak detection system to the fourth ISI 10-year interval, first period, which began March 26, 2010, and will end March 25, 2013, should it comply with the relief request as approved by the NRC.

The NRC has reviewed the information submitted by the licensee and determined the following additional information is required to complete the evaluation.

REQUEST FOR ADDITIONAL INFORMATION

REQUESTS FOR RELIEF ANO2-ISI-015 FROM

ASME CODE, SECTION XI REQUIREMENTS

ARKANSAS NUCLEAR ONE, UNIT 2

DOCKET NUMBER: 50-368

(TAC NUMBER: MF0941)

Section I, "Code Requirements," of the subject relief request (Attachment to ML13063A538) cites IWB-5222(a), which states the pressure retaining boundary includes only those portions of the system required to operate or support the safety function up to and including the first normally closed valve (including a safety or relief valve) or valve capable of automatic closure when the safety function is required. Section IV of the subject relief request states that the proposed alternative is in lieu of the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, IWC-5222(b), which states that items outside the boundaries of IWC-5222(a) and open ended discharge piping, are excluded from the examination requirements. However, IWC-5222(a) and (b) only address the boundaries for the system leakage test, while IWC-5221 addresses the pressure at which the test is to be conducted. The proposed alternative essentially affects the pressure at which the VT-2 examination will be conducted and does not alter the definition of the pressure retaining boundary that must be examined. Based on the above, please clarify the paragraph(s) of the ASME Code, Section XI, from which relief is requested.