

IPRenewal NPEmails

From: Green, Kimberly
Sent: Tuesday, June 04, 2013 10:56 AM
To: rwater1@entergy.com
Cc: Poehler, Jeffrey; Hiser, Allen; IPRenewal NPEmails
Subject: Teleconference Call to Obtain Clarification on RAI Response in May 7 Letter

Hi Roger,

The staff has requested a phone call to obtain clarification on Entergy's response to RAIs in a letter dated May 7. I had previously scheduled the call for today at 2:00 pm. So that Entergy can be prepared to answer the staff's questions, I am providing the list of the issues that the staff would like to discuss during today's call. Please let me know if you have any questions, otherwise, we look forward to the call today.

- 1) The first paragraph of Entergy's response to RAI 11a, beginning at the bottom of page 1 of the Attachment to NL-13-052, describes the method of evaluation of the lower support columns. I wanted to clarify whether this evaluation will be performed regardless of the results of the screening for thermal embrittlement susceptibility, described in the second paragraph of the response to RAI 11a.
- 2) Does Entergy plan to revise its response to RAI 11a, based on the discussions that were held at the public meeting on May 21, 2013 regarding guidance for the resolution of MRP-227-A Applicant/Licensee Action Item 7 on Plant-Specific Evaluation of CASS?
- 3) Can Entergy verify the grade of cast stainless steel for the lower support columns?
- 4) With regard to the response to RAI 15a – The response states that the term Class 1 was inadvertently included in the response to RAI 12, and that the phrase "ASME Code Class 1 fatigue evaluations for reactor vessel internals" is changed to read "ASME Code Subsection NG fatigue evaluation for reactor vessel internals." However the markups to LRA Sections A.2.2.2.1 and A.3.2.2.1 still list the reactor vessel internals fatigue TLAA under "Class 1 Metal Fatigue." This is an apparent inconsistency.

The response to RAI 11-A, by letter dated May 7, 2013, describes the functionality analysis approach for the evaluation of the IP2 and IP3 lower support columns in support of Applicant/Licensee Action Item 7 from MRP-227-A.

- 1) The response states in part that based on the lack of any documented history of fracture in the lower core support columns, it will be assumed that only a limited number of columns could actually contain flaws of significant size. Provide a more detailed basis for the number of columns that will be assumed to contain flaws, including a description of any relevant operating experience or research supporting the assumed incidence of cracking in the columns. The staff notes that the response mentioned the possibility of flaws being present due to casting defects, but MRP-227-A also indicates irradiation-assisted stress corrosion cracking (IASCC) is an aging effect for the lower support column bodies (cast).
- 2) The response states in part that since effects of embrittlement are only significant in the presence of pre-existing flaws (e.g. from the casting process) and tensile stresses capable of propagating these flaws, the screening analysis will identify regions of individual columns where thermal and irradiation effects could give rise to embrittled materials and would also be subjected to significant tensile stresses under design and service loadings. Define what is meant by "significant tensile stresses" – is there a specific numerical value of stress considered to be a threshold of significance?

Thanks,
Kim Green
301-415-1627

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