

## NRR-PMDAPEm Resource

---

**From:** Tom Shaub (Generation - 6) [tom.schaub@dom.com]  
**Sent:** Wednesday, March 05, 2014 6:54 AM  
**To:** Sreenivas, V  
**Cc:** Jay Leberstien (Generation - 3); Brian Derreberry (Generation - 3)  
**Subject:** Request for Additional Information (RAI) for North Anna Power Stations, Units 1 and 2  
Alternative Request to use Code Case N-649 (TAC Nos. MF3292 and MF3293)

V,

Request for Additional Information (RAI) for North Anna Power Stations, Units 1 and 2 Alternative Request to use Code Case N-649 (TAC Nos. MF3292 and MF3293)

Please provide a clarification of your recent submittal related to the above subject, to facilitate complete review of your response:

ASME Code IWE-5221 requires a test of containment repair/replacements and IWE-5240 requires a detailed visual examination *during* the pressure test. It is often not feasible to conduct the visual examination *during* the pressure test so Code Case N-649 was developed to allow the visual examination to be performed *during or after* the pressure test.

IWE-5222 allows the required pressure test to be deferred until the next scheduled pressure test on *minor repairs* (defined in the code) provided nondestructive examination is performed at the time of the repair/replacement. Code Case N-649 does NOT alter the requirements of deferring a pressure test; however, it does note that if a pressure test is deferred a visual examination must still be conducted *during or after* the pressure test, when conducted.

1. Based on the response and a closer review of the wording in their submittal it appears they think the Code Case somehow allows a deferral of visual examinations. Deferrals are allowed; however, they are governed by IWE-5222 regardless of whether or not Code Case N-649 is approved. NRC wants to make sure the licensee recognizes this and will continue to only defer leakage tests for minor repairs meeting the definition in IWE-5222.
2. It is noted in the response, that a visual examination will be conducted after the pressure test (which is acceptable and appropriate); however, the response stated that this was beyond the requirements of the Code Case. NRC wants to make it clear that this is not correct ... the Code Case requires a visual examination after the pressure test; regardless of whether or not the pressure test was deferred.

**V, Here is the North Anna response to the requested clarifications.**

**For Item 1, - We agree that deferral is only allowed for minor repairs as defined in IWE-5222. The repairs under consideration are minor repairs as defined in IWE-5222.**

**For Item 2, we agree that a visual examination is required by Code Case N-649 following the pressure test. The code case indicates that the required visual examination following the pressure test will be a general visual but we plan to perform both a general and detailed (VT-1) visual examination to satisfy both Code Case N-649 and IWE-5240.**

*Thomas Shaub*

Technical Consultant  
Dominion Resources, Inc.  
Phone: (804) 273-2763  
e-mail: [tom.schaub@dom.com](mailto:tom.schaub@dom.com)

---

**CONFIDENTIALITY NOTICE:** This electronic message contains information which may be legally confidential and or privileged and does not in any case represent a firm ENERGY COMMODITY bid or offer relating thereto which binds the sender without an additional express written confirmation to that effect. The information is intended solely for the individual or entity named above and access by anyone else is unauthorized. If you are not the intended recipient, any disclosure, copying, distribution, or use of the contents of this information is prohibited and may be unlawful. If you have received this electronic transmission in error, please reply immediately to the sender that you have received the message in error, and delete it. Thank you.

**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 1138

**Mail Envelope Properties** (0EDFF52FF7B957408E7E7D677B2637C51F0B64D0)

**Subject:** Request for Additional Information (RAI) for North Anna Power Stations, Units 1 and 2 Alternative Request to use Code Case N-649 (TAC Nos. MF3292 and MF3293)  
**Sent Date:** 3/5/2014 6:54:18 AM  
**Received Date:** 3/5/2014 6:54:39 AM  
**From:** Tom Shaub (Generation - 6)

**Created By:** tom.schaub@dom.com

**Recipients:**  
"Jay Leberstien (Generation - 3)" <jay.leberstien@dom.com>  
Tracking Status: None  
"Brian Derreberry (Generation - 3)" <brian.derreberry@dom.com>  
Tracking Status: None  
"Sreenivas, V" <V.Sreenivas@nrc.gov>  
Tracking Status: None

**Post Office:** INBE10W802.mbu.ad.dominionnet.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	3555	3/5/2014 6:54:39 AM

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**