

## NRR-PMDAPEm Resource

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**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*

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