

NRR-PMDAPEm Resource

From: Kim, James
Sent: Thursday, March 06, 2014 7:21 AM
To: Robinson, Christopher
Cc: Wang, Alan; Broaddus, Doug; Rosenberg, Stacey; Cheruvenki, Ganesh; Allen, Don; Smith, Rich
Subject: Verbal Authorization for Grand Gulf Relief Request, GG-ISI-17

Mr. Robinson,

In accordance with NRR Office Instruction LIC-102, "Relief Request Reviews," ADAMS ML091380595, on March 5, 2014, the NRR staff provided verbal authorization for Grand Gulf Relief Request GG-ISI-17 for deferring the examination of the ASME Code, Section XI, Category B-N-1, B13.10 reactor vessel interior at GGNS, Unit 1, until RFO-20 in 2016. The authorization was provided using the script shown below. As indicated, the NRC staff will follow up with a written safety evaluation within 150 days.

A copy of this email will be made publicly available. Please contact me if you have any questions.

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VERBAL AUTHORIZATION FOR
RELIEF REQUEST GG-ISI-17
EXAMINATION OF REACTOR VESSEL INTERIOR
GRAND GULF NUCLEAR STATION, UNIT 1
ENTERGY OPERATIONS INC.
DOCKET NUMBER 50-416

March 5, 2014

Technical Evaluation read by Stacey Rosenberg, Chief of the Vessel and Internals Integrity Branch, Nuclear Reactor Regulation.

By letter dated February 26, 2014, Entergy Operations Inc., the licensee, requested an expedited verbal approval for deferring the examination of the reactor vessel interior (Category B-N-1, B13.10) from the current refueling outage (RFO-19) until refuelling outage (RFO-20) in the year 2016. During the outage while performing this in-service inspection (ISI) at Grand Gulf Nuclear Generating Station (GGNS) Unit 1, the submersible inspection vehicle being used did not produce sufficient image quality to satisfy the visual examination (VT-3) standards. In its February 26, 2014, letter, the licensee stated that continuation of the VT-3 examination of the reactor vessel interior would require substitution of submersible inspection vehicle with manually operated inspection methods which would increase radiological dose to personnel. In response to the NRC staff's request for additional information, by letter dated February 28, 2014, the licensee provided the technical basis for deferring the ISI examinations for B-N-1 components until RFO-20 in the year 2016.

On the basis of information submitted, the NRC staff has determined that the proposed relief request for deferring the VT-3 examinations of the reactor vessel interior (Category B-N-1, B13.10) until RFO-20 in 2016 is acceptable for the following reasons:

- (a) Previous examinations of the reactor vessel interior at GGNS, found no indications of distortion, corrosion, wear, loose and/ or missing parts, with the exception of a gouge to the vessel interior wall above the top guide. Subsequent examinations of the gouged area revealed no change in the size of the gouge which indicates that there is no active degradation associated with the gouge;
- (b) continuation of VT-3 examination of the reactor vessel interior with manually operated inspection methods would result in an increase in radiological dose of approximately 397 millirem during RFO-19 without a compensating increase in the level of quality and safety; and,
- (c) deferring the examinations of the reactor vessel interior does not compromise the structural integrity and safety and functionality of the reactor vessel interior.

The NRC staff finds that continuation of VT-3 examinations during the current outage (RFO-19) of the reactor vessel interior would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. Accordingly, the NRC staff concludes that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(a)(3)(ii).

Therefore, the NRC staff authorizes the Request for relief for a one-time deferral of the examination of the ASME Code, Section XI, Category B-N-1, B13.10 reactor vessel interior at GGNS, Unit 1, until RFO-20 in 2016. The reactor vessel interior (Category B-N-1, B13.10) shall be examined using the VT-3 technique in 2016.

Authorization read by Douglas Broaddus, Chief of the Plant Licensing Branch IV-2, NRR

As Chief of the Plant Licensing Branch IV-2, Office of Nuclear Reactor Regulation, I concur with the conclusions of the Vessel and Internals Integrity Branch. The NRC staff determines that the proposed alternative provides reasonable assurance of structural integrity reactor vessel interior. Therefore, as of March 5, 2014, the NRC staff authorizes the Request for verbal relief for deferring the examination of the ASME Code, Section XI, Category B-N-1, B13.10 reactor vessel interior at GGNS, Unit 1, until RF-20 in 2016. The reactor vessel interior (Category B-N-1, B13.10) shall be examined using VT-3 technique in 2016.

All other requirements of ASME Code, Section XI, for which relief was not specifically requested and authorized by the NRC staff remain applicable, including the third party review by the Authorized Nuclear In-service Inspector.

The NRC staff's goal is to issue the written safety evaluation within 150 days in accordance with the Office of Nuclear Reactor Regulation standards.

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