

NRR-PMDAPEm Resource

From: Saba, Farideh
Sent: Thursday, October 02, 2014 4:32 PM
To: ken.frehafer@fpl.com
Cc: eric.katzman@fpl.com; Lewis, Atanya (Atanya.Lewis@fpl.com); Mitchell, Eliza
Subject: RAIs for St. Lucie Unit Relief Request No. 6
Attachments: St Lucie 2 RAIs for Fourth 10 year Interval RR No 6 (MF4336).doc

Importance: High

Ken,

The NRC staff has reviewed the Florida Power & Light Relief Request No. 6 in the letter dated June 30, 2014 (Agencywide Documents Access and Management System Accession No. ML14203A004), "Inservice Inspection Plan: Fourth Inservice Ten-Year Interval Relief Request (RR) No. 6, Revision 2," for St. Lucie Plant, Unit 2.

The NRC staff determined that additional information is needed for the staff to be able to complete its review of RR-6 for St. Lucie Unit 2. Please see the attached request for additional information (RAIs). The NRC staff agrees with your proposed response date of November 15, 2014.

Thanks,

Farideh
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**REQUESTS FOR ADDITIONAL INFORMATION (RAIs)
FLORIDA POWER & LIGHT
ST. LUCIE Plant UNIT 2
RELIEF REQUEST NO. 6, REVISION 0 FOR THE
FOURTH 10-YEAR INTERVAL INSERVICE INSPECTION PROGRAM
DOCKET NUMBER 50-389
(TAC NO. MF4336)**

RAI 1

In submitted relief request, two different ASME Codes are being used (a) ASME OM Code for snubbers (pin-to-pin), and (b) ASME Boiler & Vessel Code, Section XI for snubber associated attachment hardware (pin-to-pipe and pin-to-structure, excluding integral attachments). Verify that ASME OM Code 2004 Edition with 2005 and 2006 Addenda, and ASME Section XI 2007 Edition with 2008 Addenda will be used.

RAI 2

For most plants, snubber (pin-to-pin) inservice examination and snubber associated attachment hardware (pin-to-pipe and pin-to-structure, excluding integral attachments) examinations are implemented by separate programs. Explain in details how two different programs (1) snubbers (pin-to-pin) and (2) snubber associated attachment hardware (pin-to-pipe and pin-to-structure, excluding integral attachments), examinations will be maintained and implemented under one program, as proposed.

RAI 3

In Relief Request RR-6, Section 4, "Reason for Request," it states that "PSL-2 is required to perform VT-3 visual examination on Class 1, 2, and 3 supports, including attachment hardware, per ASME Section XI. PSL-2 is also required to perform visual examinations and testing on snubber assemblies in accordance with ASME OM Code, Subsection ISTD. When incorporating the criteria of Subsection ISTD into the Snubber Program, FPL included the visual examination of snubber attachment hardware (pin-to-pipe and pin-to-structure) along with the visual examination of the snubber assembly (pin-to-pin). The visual examination criteria of the Snubber Program are nearly identical to those established by ASME Section XI. Having two identical sets of requirements for visual examination of snubber attachment hardware would require the performance of redundant examination and cause unnecessary confusion in the sample section, data collection and documentation of these examinations."

Explain how the proposed visual examination criteria of the snubber program (ASME OM Code, Subsection ISTD) are identical to the VT-3 visual examination per IWA-2213 (IWA-2213(a) thru IWA-2213(g)).of ASME Section XI, Edition 2007 with 2008 Addenda.

RAI 4

In Section 5, "Proposed Alternative," FPL proposes to perform the visual examination of snubbers and associated attachment hardware (pin-to-pipe and pin-to-structure, excluding integral attachments) per the Snubber Program, which is documented in St. Lucie Instruction Procedure No. QI-10-PR/PSL-6.

Please explain in detail (by referencing applicable Sections of the ASME OM Code and ASME Section XI for VT-3) how St. Lucie Unit 2 Instruction Procedure No. QI-10-PR/PSL-6, which is proposed to perform the visual examination of snubbers and associated attachment hardware (pin-to-pipe and pin-to-structure, excluding integral attachments), meets all the VT-3 requirements of ASME Section XI.

RAI 5

In a FPL Technical Specification amendment request submittal dated June 30, 2014 (ADAMS Accession No. ML14049A284), Attachment 5, "Proposed Snubber Program Plan," Section 4.2 of "Examination and Testing Frequency," states that Code Case OMN-13, which allows the extension of visual examination interval (up to 10 years), will be implemented for snubber inspection. This means that snubber attachment hardware (pin-to-pipe and pin-to-structure, excluding integral attachments) will also be inspected on extended frequency of 10 years. ASME Section XI, Table IWF-2500-1, requires 15% of Class 1, 15% of Class 2, 10% of Class 3, and 100% of the supports (other than piping supports) over a 10-year interval. Please respond to the following:

- (1) ASME OM Code Case OMN-13 allows extension of the snubber visual examination to once every 10 years, and can be implemented after the requirements of ISTD-4251 and ISTD-4252 have been satisfied and the previous examination per Table ISTD 4252-1 was performed satisfactory at a maximum interval of two fuel cycles.

After implementing Code Case OMN-13, please explain and elaborate on how the proposed visual examination of snubber (pin-to-pin) and snubber associated attachment hardware (pin-to-pipe and pin-to-structure) extended up to 10 years, can be aligned with the 10-year ISI interval of the support attachments (containing the snubber) for inspection.

- (2) While using OMN-13 for snubbers during the extended interval of 10 years, if the number of unacceptable snubbers (pin-to-pin) exceeds the ISTD-4252-1 limits (these unacceptable snubbers can be found during non-inspection activities such as walkdowns or any other events i.e. water hammer, etc.), what action will be taken and how will these findings align with the supports and attachments inspection.

RAI 6

IWF-2430(a) states, in part, that component supports examinations performed in accordance with Table IWF-2500-1 that reveal flaws or relevant conditions exceeding the acceptance standards of IWF-3400, and that require corrective measures, shall be extended, during the current outage, to include the component supports immediately adjacent to flawed supports. Please explain how this situation (to include supports adjacent to flawed supports) will be considered, while using the proposed relief request to perform the visual examination of snubbers (pin-to-pin) and associated attachment hardware (pin-to-pipe and pin-to-structure, excluding integral attachments). (Note: The adjacent flawed supports could be with or without a snubber)

References:

1. Letter from Florida Power & Light (FPL), to the NRC, "Inservice Inspection Plan: Fourth Inservice Ten-Year Interval Relief Request No. 6, Revision 2," for St. Lucie Plant, Unit 2, (PSL-2) Docket No. 50-389, dated June 30, 2014 (2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14203A004)
2. Letter from FPL, to NRC, "Fourth Ten-Year Inservice Inspection Interval, License Amendment Request- Changes to Snubber Surveillance Requirements," St. Lucie Plant, Unit 2, Docket No. 50-389, dated January 30, 2014 (ADAMS Accession No. ML14049A284).