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Ref. # 10CFR50.55a(g)(6)

CP-201500157 TXX-15022

February 24 , 2015

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT DOCKET NO. 50-446 RELIEF REQUEST NO. 2C3-1 FOR THE UNIT 2 REACTOR PRESSURE VESSEL LEAK-OFF FLANGE (THIRD ISI INTERVAL START DATE: AUGUST 3, 2014; THIRD ISI INTERVAL END DATE: AUGUST 2, 2023)

REFERENCES: 1. Letter logged TXX-13145 dated October 13, 2013, from Rafael Flores to the NRC submitting Relief Request No. C-3 for the Unit 2 Second 10 Year ISI Interval From 10CFR50.55a Inspection Requirements Due to Hardship (Second Interval Start Date: August 13, 2004) (ML13312A121) as supplemented by letters dated January 23, and February 11, 2014 (ADAMS Accession Nos. ML 14038A256 and ML 14055A318, respectively.

- 2. NRC Letter dated April 4, 2014, from Michael T. Markley to Rafael Flores concerning Comanche Peak Nuclear Power Plant, Unit 2 - Approval of Relief Request No. C-3 for the Third 10-Year Inservice Inspection Interval (TAC No. MF2997) (ML14084A291)
- 3. Letter logged TXX-12129 dated August 23, 2012, from Rafael Flores to the NRC submitting Relief Request No. C-2 for the Unit 1 Third 10 Year ISI Interval From 10CFR50.55a Inspection Requirements Due to Hardship (Third Interval Start Date: August 13, 2012)(ML12250A670) as supplemented by letter dated January 9, 2013 (ML130250339)
- NRC Letter dated March 19, 2013, from Michael T. Markley to Rafael Flores concerning Comanche Peak Nuclear Power Plant, Unit 1 - Approval of Relief Request No. C-2 for the Third 10-Year Inservice Inspection Interval (TAC No. ME9409) (ML13046A385)

Dear Sir or Madam:

Pursuant to 10 CFR 50.55a (h)(3)(z)(1) Luminant Generation Company LLC (Luminant Power) is submitting Relief Request 2C3-1 for Comanche Peak Nuclear Power Plant (CPNPP) Unit 2 for the third ten year inservice inspection interval. Luminant Power has determined that compliance with certain inspection requirements of ASME Section XI would result in an unnecessary hardship or unusual difficulty without a compensating increase in the level of quality and safety.

The reactor pressure vessel flange leak-off piping configuration precludes system pressure testing when the reactor vessel head is removed. The configuration also precludes pressurizing the line externally

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when the head is installed. A visual examination of the accessible areas was performed during the second interval on the unpressurized subject piping as part of the Class 2 leakage test. No evidence of leakage has been identified for the subject component. No undue risk to the public health and safety is presented by this request.

A similar relief request was previously submitted to the NRC for Unit 2 second interval, via Reference 1, and reviewed and approved via Reference 2.

The VT-2 system leakage tests of the reactor pressure flange leak-off piping will occur once in each of the three periods of the current third interval. Therefore, Luminant Power requests approval of this relief request by September 30, 2015, to support the upcoming CPNPP Unit 2 refueling outage.

This communication contains no new commitments regarding CPNPP Unit 2.

Should you have any questions, please contact Mr. Jack Hicks at (254) 897-6725.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

By: Fred W. Madden

Director, External Affairs

Attachments:

- Relief Request Number 2C3-1 For the Reactor Pressure Vessel Leak-Off Piping (Third 10-Year ISI Interval Start Date: August 3, 2014)
- (2) Reactor Pressure Vessel Seal Leak-off Details
- (3) Piping and Instrumentation Diagram and Piping Isometric Drawings
- c Marc L. Dapas, Region IV Balwant K. Singal, NRR Resident Inspectors, Comanche Peak Jack Ballard, ANII, Comanche Peak Robert Free, TDLR

1. ASME Code Component Affected:

ASME Code Class:	Code Class 2				
References:	ASME Section XI, Table IWC-2500-1 and IWC-5220				
Examination Category:	C-H (All Pressure Retaining Components)				
Item Number:	C7.10				
Description:	Alternative Pressure Testing Requirements for the RPV Flange Leak-Off Piping				
Component:	NPS ¾" RPV Flange Seal Leak-Off Piping				
Material:	SA376 type 304 or 316 Stainless Steel				
Line Numbers:	RC-2-080, RC-2-081, RC-2-082				
Plant Drawings:	BRP-RC-2-RB-005, BRP-RC-2-RB-006, BRP-RC-2-RB-007, BRP- RC-2-RB-013, BRP-RC-2-RB-014, BRP-RC-1-RB-042, BRP-RC-1- RB-043, M2-0250				

2. Applicable Code Edition and Addenda:

The applicable ASME Boiler and Pressure Vessel Code edition and addenda is ASME Section XI, "Rules for Inservice of Nuclear Power Plant Components," 2007 Edition through 2008 Addenda. Hereafter referred to as the "Code."

3. Applicable Code Requirement:

ASME Section XI, Subarticle IWC-2500, Table IWC-2500-1, Code Category C-H, Item Number C7.10 requires that all Class 2 pressure retaining components be subject to a system leakage test with a Visual, VT-2 examination each inspection period. The system leakage test is performed at the pressure obtained while the subject portion of the system is performing its normal operating function or during a comparable test.

4. <u>Reason for Request: Hardship without a compensating increase in quality and safety (10 CFR 50.55a (h)(3)(z)(1)).</u>

As discussed in Section 3, "Applicable Code Requirement," ASME Section XI, 2007 Edition through 2008 Addenda requires that Class 2 pressure boundary piping shall be pressure tested once each inspection period. The Reactor Pressure Vessel (RPV) head flange seal leak detection piping is separated from the reactor coolant pressure boundary by one passive membrane, which is an O-ring located on the inner vessel flange as shown in Attachment 2. A second O-ring is located on the outside of the tap in the vessel flange. Failure of the inner O-ring is the only condition under which this line is pressurized. Therefore, the line is not expected to be pressurized during the system pressure test following a refueling outage.

The configuration of this piping precludes system pressure testing while the vessel head is removed because the time required by personnel for the installation and removal of a threaded plug in the flange face to act as a pressure boundary for the test would incur significant dose (estimated 20 - 40 mRem/minute), which would be an ALARA concern. This activity would also present a Foreign Material Exclusion issue for the 1/8'' plug that would be required to be installed to complete a leakage test at pressure.

The configuration also precludes pressurizing the line externally with the head installed at the start of an outage. The top head of the vessel contains two grooves that hold the O-rings. The Orings are held in place by a series of retainer clips that are housed in recessed cavities in the flange face. If a pressure test were to be performed with the head on, the inner O-ring would be pressurized in a direction opposite to its design function. This test pressure would result in a net inward force on the inner O-ring that would tend to push it into the recessed cavity that houses the retainer clips. The thin O-ring material would likely be damaged by the inward force. The inner O-ring failure would prevent pressure build-up by allowing water to pass by and enter the reactor vessel. To ensure that it was in fact an O-ring failure and not a leak in the leak-off piping, the portion of piping in the reactor vessel nozzle inspection areas ("sandboxes") would have to be inspected. The conditions inside the "sandboxes" at the beginning of the outage prior to removing the head would be considered unsafe with extremely high temperatures and dose ratings ranging from 150 to 250 mRem/hr. The leak-off piping travels through three of the eight "sandboxes". It is felt that performing the examination in this manner would result in an unnecessary hardship without a sufficient compensating increase in the level of quality and safety. Therefore, the only time, other than O-ring failure, that the leak-off lines are fluid filled under any type of pressure is when the head is removed and the cavity flooded.

Attachment 3 contains the piping and instrumentation diagram (P&ID) and the piping isometric drawings showing the subject flange leak-off line.

5. Burden Caused by Compliance:

Purposely failing or not installing the inner O-ring in order to perform a pressure test would require purchasing a new O-ring set and the time and radiation exposure associated with removing and reinstalling the RPV head to replace the O-rings would be an undue hardship. Therefore, compliance with the IWC-5221 system leakage test requirements results in an unnecessary hardship without a sufficient compensating increase in the level of quality and safety.

6. Proposed Alternative and Basis for Use:

In lieu of the requirements of IWC-5221, a VT-2 visual examination of the accessible areas will be performed each period on the piping subjected to the static pressure head when the reactor cavity is filled. This test will be part of the reactor coolant Class 2 leakage test.

During normal operation, the inner O-ring isolation valve is open. Should the inner O-ring leak, a high temperature alarm actuates at 140 degrees F in the control room, informing the operator of the leak. The operator monitors reactor vessel flange leak-off temperature in accordance the CPNPP alarm procedures (ALM-053A for Unit 1 and ALM-053B for Unit 2) and closes the valve, isolating the leak. The procedure directs shutting the manual isolation valve and opening another valve, transferring RCS pressure boundary maintenance to the outer O-ring. Opening the valve then transfers leak detection to the outer O-ring. All drainage/leakage is piped to the reactor coolant drain tank. The procedure also addresses notifying chemistry department to increase monitoring of the containment atmosphere to detect possible outer O-ring failure; perform an operations test to determine leakage rate as applicable; and initiating corrective action documents to identify the condition and correct the condition as applicable.

Additionally, the flange seal leak-off line is essentially a leakage collection/detection system and the line would only function as a Class 2 pressure boundary if the inner O-ring fails, thereby pressurizing the line. If any significant leakage does occur in the leak-off line piping itself during this time of pressurization then it would clearly exhibit boric acid accumulation and be discernable during the proposed VT-2 visual examination that will be performed unpressurized as proposed in this request. The elevation of the Reactor Vessel flange is 834' ½". The elevation for the water level when the cavity is flooded is 858" 6". Therefore, the minimum pressure at the opening of the flange leak-off line when the exam is performed is 24' 5 ½ " of static pressure head or 10.6 psi.

The system leakage test will be performed in accordance with ASME Section XI Subarticle IWA-5213(a). A 10-minute hold time will be maintained after test pressure has been reached for Class 2 components that are not in use during normal operating conditions. The subject lines are also not insulated.

There has been no known evidence of corrosion, stress corrosion cracking, or fatigue in the subject flange leak-off piping at Comanche Peak. Database searches for the subject lines in the Comanche Peak Corrective Action Program identified no historical instances of degradation.

7. Duration of Proposed Alternative:

This alternative is requested for the Third Inservice Inspection Interval, which began on August 3, 2014 and ends on August 2, 2024.

8. Precedents:

- (1) Comanche Peak Nuclear Power Plant, Unit 2 Second Inspection Interval Relief Request C-3 "Alternative Pressure Testing Requirements for the RPV Flange Leak-Off Piping", as approved by the NRC on April 4, 2014 (ML14084A291).
- (2) Comanche Peak Nuclear Power Plant, Unit 1 Third Inspection Interval Relief Request C-2 "Alternative Pressure Testing Requirements for the RPV Flange Leak-Off Piping", as approved by the NRC on March 19, 2013 (ML13046A385).
- (3) LaSalle County Station Third Inspection Interval Relief Request I3R-08. "Pressure Testing of the Reactor Vessel Head Flange Leak Detection System", as approved by the NRC in a letter dated January 30, 2008 (ADAMS Accession No. ML073610587)
- (4) Susquehanna Steam Electric Station Third 10-Year Inservice Inspection (ISI) Interval Program Plan Request for Relief 3RR-07 "Exemption for Pressure Testing Reactor Pressure Vessel Head Flange Seal Leak Detection System", approved by the NRC in a letter dated September 24, 2004 (ADAMS Accession No. ML 042680078)

9. <u>Reference:</u>

Code Case N-805, "Alternative to Class 1 Extended Boundary End of Interval or Class 2 System Leakage Testing of Reactor Vessel Head Flange O-ring Leak Detection System," was issued to the 2010 Edition of the ASME Section XI Code and is listed in Supplement 6 for Code Cases. However, Code Case N-805 has not been approved by the NRC and is not identified in Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1."



Figure A3-23: Phase 2 480VAC FLEX Generator Connection to Plant Support Power

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Reactor Pressure Vessel Seal Leak-Off Details

Luminant Power Comanche Peak Nuclear Power Plant

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Figure 1: REACTOR PRESSURE VESSEL HEAD FLANGE LEAK-OFF LINE CONFIGURATION

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Reactor Pressure Vessel Head Flange Leak-Off Line Details

Attachment 3 to TXX-15022

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Piping and Instrumentation Diagram

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Piping Isometric Drawings









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