

NRR-PMDAPEm Resource

From: Mozafari, Brenda
Sent: Tuesday, April 21, 2015 12:48 PM
To: Mitchel.Mathews@exeloncorp.com; Simpson, Patrick R.:(GenCo-Nuc)
(patrick.simpson@exeloncorp.com)
Cc: Tate, Travis
Subject: FW: DRAFT REQUEST FOR ADDITIONAL INFORMATION (RAI) REGARDING DRESDEN Relief I4-17
Attachments: 2nd Draft April RAI MF3352 MF 3353.docx

MITCH and PAT,

Regarding the electronic RAI for the 10-year ISI Relief I4-17 (Previously Draft of a Draft awaiting BC concurrence.) Herein are the Draft RAI questions related to Dresden's LAR . RAI Questions are attached.

Subject: DRAFT REQUEST FOR ADDITIONAL INFORMATION (RAI) REGARDING DRESDEN Relief I4-17

Mitch,

SUBJECT: DRAFT REQUEST FOR ADDITIONAL INFORMATION REGARDING THE DRESDEN NUCLEAR POWER STATION, UNITS 2, AND 3 FOURTH 10-YEAR INTERVAL INSERVICE INSPECTION PROGRAM PLAN REQUESTS FOR RELIEF (TAC NOS. MF3352 AND MF3353)
Mitch,

The NRC staff has reviewed and evaluated the information provided by, Exelon Generation Company, LLC (the licensee) in its letter dated October 16, 2014. The licensee submitted additional information for Request for Relief I4-17 from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI for Dresden Nuclear Power Station, Units 2 and 3 (DNPS 2 and 3). The requests for relief apply to the fourth 10-year inservice inspection interval, in which the licensee adopted the 1995 Edition through the 1996 Addenda of ASME Code Section XI as the code of record.

The NRC staff's request for additional information (RAI) or to clarify RAI responses is contained in the enclosed Draft RAI. Your response is requested within 30 days of the date of this email and should contain the verbatim questions of the Draft RAI. I will send the ADAMS accession number of the emailed RAI for you to reference when you respond to the Draft RAI. When your response is received I will provide an email to indicate the RAI is final which will be thus documented in ADAMS.

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SECOND REQUEST FOR ADDITIONAL INFORMATION
ON THE FOURTH TEN YEAR 10-YEAR IN SERVICE INSPECTION INTERVAL REQUEST
FOR RELIEF I4R-17
FOR
EXELON GENERATION COMPANY, LLC. DRESDEN NUCLEAR P
OWER STATION, UNITS 2 AND 3
DOCKET NUMBERS: 50-237 AND 50-249

1. SCOPE

By letter dated December 30, 2013, (Agencywide Documents Access & Management System (ADAMS) Accession Number ML13364A361), the licensee, Exelon Generation Company, LLC, submitted Request for Relief I4R-17 from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, Rules for In Service Inspection of Nuclear Power Plant Components for Dresden Nuclear Power Station, Units 2 and 3 (DNPS 2 and 3). The request for relief applies to the fourth 10-year in service inspection (ISI) interval, in which the licensee adopted the 1995 Edition through the 1996 Addenda of ASME Code Section XI as the code of record. The U.S. Nuclear Regulatory Commission (NRC) requested that the licensee provide further information, and the licensee provided a response to the Request for Additional Information (RAI) in a letter dated October 16, 2014 (ADAMS Accession Number ML14293A255).

However, certain requested information was not provided and/or requires clarification in order for the staff to complete the evaluation of the licensee's request. Please submit answers to the following questions.

2. REQUEST FOR ADDITIONAL INFORMATION

2.1 Request for Relief I4R-17, Examination Category B-A, Item B1.40, Pressure Retaining Welds in Vessels in Reactor Vessels, DNPS 2 and 3

- 1) The licensee states that, for Unit 2, only 41.7 percent coverage was obtained on the top head-to-flange weld. The drawing submitted in the RAI response appears to support the claim that examinations may only be conducted from the head side of the weld due to geometry. However, it is stated that Unit 3 was able to get 72 percent volumetric coverage, while the drawing shows the top head-to-flange welds at DNPS 2 and 3 to be geometrically similar. Please clarify why the licensee was able to obtain a marked increase in volumetric coverage on DNPS 3.
- 2) In Attachment 2 of the licensee's RAI response, it appears that the top head-to-flange weld drawing on page 333 has different coverage values than the coverage calculation sheet on page 334. Please verify the information provided for the Unit 2 top head-to-flange weld in the RAI response and provide a corrected coverage sketch or coverage calculation sheet, whichever one is currently incorrect.

2.2 Request for Relief I4R-17, Examination Category B-D, Items B3.90 and B3.100, Full Penetration Welded Nozzles in Vessels, DNPS 2 and 3

Enclosure

- 1) Please provide a coverage plot for Unit 2 RPV nozzle inside radius Weld 2/1/RPV SHELL/N5B-1 as there was no sketch provided in the licensee's RAI response.
- 2) Please verify that the base materials near the inside surface of the weld joints, particularly the high regions of stress, where examined in the B-D, Items B3.90 welds in DNPS 2 and 3.

2.3 Request for Relief I4R-17, Part G, Examination Category R-A, Items R1.11 and R1.20, Risk Informed Piping Examinations, DNPS 2 and 3

Table 2.3.1- Examination Category R-A (Unit 2)			
Code Item	Weld ID	Weld Type	Coverage Obtained
R1.11	2/1/1001A-16/16-11	Tee-to-Pipe	36.0 %
R1.11	2/1/1001B-16/16-2	Flange-to-Pipe	85.0 %
R1.11	2/1/1005B-14/14-7	Valve-to-Pipe	50.0 %
R1.20	2/1/1403-10/W-103	Valve-to-Pipe	81.0 %
R1.20	2/1/1404-10/W-112	Valve-to-Pipe	85.0 %

Table 2.3.2- Examination Category R-A (Unit 3)			
Code Item	Weld ID	Weld Type	Coverage Obtained
R1.11	3/2/3204B-18/18-1	Valve-to-Tee	78.9 %
R1.20	3/1/1302-14/14-9(A)	Flange-to-Pipe	50.0%

Provide coverage plots for all RI-ISI welds listed in Tables 2.3.1 and 2.3.2 above. From the coverage sketches provided in the licensee's RAI response, it is difficult for the staff to determine how the licensee determined the coverage percentages on the welds in Table 2.3.1 and 2.3.2 as the supplied diagrams are very similar to each other yet yield very different coverage percentages.

2.4 Request for Relief I4R-17, Examination Category C-B, Item C2.21, Pressure Retaining Nozzle Welds in Class 2 Vessels, DNPS 2 and 3

Table 2.4.1- Examination Category C-B (Unit 2)			
Code Item	Weld ID	Weld Type	Coverage Obtained
C2.21	2/2/1302A-12/12-9	ISO Condenser Nozzle Weld	50.0 %
C2.21	2/2/1302B-12/12-8	ISO Condenser Nozzle Weld	50.0 %
C2.21	2/2/1303A-8/8-9	ISO Condenser Nozzle Weld	50.0 %
C2.21	2/2/1203B-8/8-8	ISO Condenser Nozzle Weld	50.0 %

Table 2.4.2- Examination Category C-B (Unit 3)			
Code Item	Weld ID	Weld Type	Coverage Obtained
C2.21	3/2/1302A-12/12-8	ISO Condenser Nozzle Weld	37.8 %
C2.21	3/2/1302B-12/12-9	ISO Condenser Nozzle Weld	37.8 %
C2.21	3/2/1303A-8/8-8	ISO Condenser Nozzle Weld	50.0 %
C2.21	3/2/1303B-8/8-9	ISO Condenser Nozzle Weld	52.3 %

- a. Verify that for the welds described in Table 2.4.1 and 2.4.2 that the examination volumes included in the welds and the base materials near the inside surface of the weld joint, particularly the high regions of stress were examined.