

## **NRR-PMDAPEm Resource**

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**From:** Lamb, John  
**Sent:** Wednesday, December 02, 2015 1:14 PM  
**To:** Frehafer, Ken  
**Cc:** Katzman, Eric (Eric.Katzman@fpl.com); Saba, Farideh; Buckberg, Perry; Tsao, John; Bedi, Gurjendra  
**Subject:** For Your Review - DRAFT RAI - St. Lucie Unit 1 - Snubber LAR (MF6490)  
**Attachments:** DRAFT - St Lucie Unit 1 RAIs MF6490.docx  
  
**Importance:** High

Ken,

Attached, for your review, is a DRAFT RAI regarding the St. Lucie Unit 1 Snubber LAR (MF6490). Please review to ensure that the questions are understandable, the regulatory basis is clear, there is no proprietary information contained in the RAI, and to determine if the information was previously docketed. Please also let me know if FPL wishes to have a conference call to clarify the DRAFT RAI questions and how much time FPL needs to respond to the RAI.

Thanks.  
John

**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 2523

**Mail Envelope Properties** (John.Lamb@nrc.gov20151202131400)

**Subject:** For Your Review - DRAFT RAI - St. Lucie Unit 1 - Snubber LAR (MF6490)  
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**Received Date:** 12/2/2015 1:14:00 PM  
**From:** Lamb, John

**Created By:** John.Lamb@nrc.gov

**Recipients:**

"Katzman, Eric (Eric.Katzman@fpl.com)" <Eric.Katzman@fpl.com>  
Tracking Status: None  
"Saba, Farideh" <Farideh.Saba@nrc.gov>  
Tracking Status: None  
"Buckberg, Perry" <Perry.Buckberg@nrc.gov>  
Tracking Status: None  
"Tsao, John" <John.Tsao@nrc.gov>  
Tracking Status: None  
"Bedi, Gurjendra" <Gurjendra.Bedi@nrc.gov>  
Tracking Status: None  
"Frehafer, Ken" <Ken.Frehafer@fpl.com>  
Tracking Status: None

**Post Office:**

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
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DRAFT - St Lucie Unit 1 RAIs MF6490.docx		31557

**Options**

**Priority:** High  
**Return Notification:** No  
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REQUEST FOR ADDITIONAL INFORMATION  
REGARDING PROPOSED LICENSE AMENDMENT REQUEST  
CHANGES TO SNUBBER SURVEILLANCE REQUIREMENTS  
FLORIDA POWER AND LIGHT COMPANY (FPL)  
ST. LUCIE UNIT 1  
DOCKET NO. 50-335  
TAC No. MF6490

References

1. Letter from Florida Power and Light, to NRC, "St. Lucie Unit 1, Fourth Ten-Year Inservice Inspection Interval License Amendment Request Changes to Snubber Surveillance Requirements, dated July 15, 2015 (ADAMS Accession No. ML15198A029).
2. St. Lucie Unit 1, Docket No. 50-335, Fourth Ten-Year Inservice Inspection Interval ISI Program Plan - Revision 0 (ADAMS Accession No. ML080810193).
3. Regulatory Issue Summary (RIS) 2010-06, Inservice Inspection and Testing Requirements of Dynamic Restraints (Snubbers).

To complete its review, the Nuclear Regulatory Commission (NRC) staff requests the following additional information.

**RAI 1**

Attachment 1 of July 15, 2015 submittal (Reference 1), "Description and Assessment", Section 2.0, Detailed Description, Page 1, states that St. Lucie Unit 1 fourth 10-year ISI interval began February 11, 2008 and will continue until February 10, 2018. Currently, as described in Technical Specifications (TS), TS 3/4.7.10 and FPL Fourth 10-Year Inspection Interval Program submittal letter L-2008-043, dated March 13, 2008, (ADAMS Accession No. ML080810193) snubber testing and examination are performed in accordance with the requirements of 10 CFR 50.55a(b)(3)(v), which allows the use of Subsection ISTD, "Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants," of the American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) Code, the 2001 Edition through 2003 Addenda. As allowed by 10 CFR 50.55a(g)(4)(iv), FP&L is proposing the use of Subsection ISTD of the ASME OM Code, the 2004 Edition with 2005 and 2006 Addenda for the remainder of the St. Lucie Unit 1 Fourth 10-year ISI interval, subject to Commission approval.

Section 1.6.1.20 of Reference 2, dated March 13, 2008, states that "St. Lucie 1 will utilize the option in 10CFR50.55a(b)(3)(v) to implement Subsection ISTD of the ASME OM Code, 2001 Edition through the 2003 Addenda in place of the requirements for snubbers in Section XI, IWF-5200(a) and (b) and IWF-5300(a) and (b)".

- (a) Please explain whether any relief request was submitted to the NRC to use TS 3/4.7.10 requirements in lieu of the ASME OM Code requirements or any license amendment request was submitted to the NRC to ensure that TS is consistent with the Subsection ISTD of the ASME OM Code, 2001 Edition with 2003 Addenda in accordance with 10 CFR 50.55a(g)(4).

Enclosure

- (b) Please verify that currently, VT-3 method is being used for snubber visual examination while using the ASME OM Code, Subsection ISTD, 2001 Edition thru 2003 addenda as required by 10 CFR 50.55a(b)(3)(v).
- (c) Please provide the dates when St. Lucie Unit 1 will start using the snubber program based on the ASME OM Code, the 2004 Edition through 2005 and 2006 addenda as discussed in Attachment 5 of the submittal.

## **RAI 2**

By Federal Register Notice 79 FR 65776, dated November 5, 2014, which became effective on December 5, 2014, the paragraphs headings in 10 CFR 50.55a were revised. Accordingly 10 CFR 50.55a(a)(3) is now covered under the equivalent 10 CFR 50.55a(z). Therefore, please change the followings:

- (a) Reference 1, Page 1 of 5, Section 3.0 "Technical Evaluation," first paragraph, the referenced regulation 10 CFR 50.55a(a)(3) should be changed to 10 CFR 50.55a(z).
- (b) Reference 1, Page 2 of 5, Section 3.0 "Technical Evaluation," second paragraph, in sixth line, the referenced 10 CFR 50.55a(3) should be changed to 10 CFR 50.55a(z).

## **RAI 3**

Reference 1, Section 3.0, "Technical Evaluation," the second paragraph states that "As noted in Regulatory Issue Summary (RIS) 2010-006, the licensees have the option to control the ASME Code-required ISI and testing of snubbers through their TS or other licensee-control documents. For plants using their TS to govern ISI and testing of snubbers, 10 CFR 50.55a(g)(5)(ii) requires that if a revised ISI program for a facility conflicts with the TS, the licensee shall apply to the Commission for amendment of the TS to conform the TS to the revised program. Therefore, when proposing program alternatives in accordance with 10 CFR 50.55a(a)(3) [10 CFR 50.55a(z)] and 10 CFR 50.55a(g)(4), licensees must submit any required amendments to ensure their TS remain consistent with the new code of record or NRC-approved alternatives."

RIS 2010-06 also states that "The TS, TRM, or other licensee-controlled documents, governing the snubber ISI and testing program, do not eliminate the 10 CFR50.55a requirements to update the program at 120-month intervals, in accordance with 10 CFR 50.55a(g)(4), or to request and receive NRC authorization for alternatives to the Code requirements, when appropriate."

Provide details on any actions taken for the snubber program at St. Lucie Unit 1 in response to RIS-2010-006 and Enforcement Guidance Memorandum (EGM) 2010-01.

## **RAI 4**

Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36(c)(3), "Surveillance Requirements," states that, "...Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for

operation will be met...” The proposed amendment request would delete the specific requirements for demonstrating snubber operability, currently in surveillance requirement (SR) 4.7.10. A reference to “SR 4.7.10, Snubber Test Program” would be added in place of the specific requirements. The proposed changes in the license amendment request do not provide sufficient detail necessary to adequately demonstrate snubber operability as per 10 CFR 50.36(c)(3). Please reference 10 CFR 50.36(c)(3) as part of the basis for the proposed TS change and provide sufficient detail necessary to adequately demonstrate snubber operability.

#### **RAI 5**

Attachments 4 of the July 15, 2015 submittal discusses “Comparison of Current TS Requirements to Revised ISI Snubber Program assessment.”

- (a) Please provide the edition and addenda of the ASME OM Code which is used for the comparison.
- (b) The comparison Table, second column, “Revised ISI Program Requirement for TS 4.7.10.c (page 3 of 8),” states that “...ISTD-4270 requires that snubbers that do not meet examination requirements of ISTD-4230 shall be evaluated to determine the root cause of the unacceptability...” These wordings are not matching with the requirements of the ASME OM Code, 2004 Edition with 2005 and 2006 Addenda (if the comparison Table is based on the ASME OM Code, 2004 Edition with 2005 and 2006 addenda). Please explain the discrepancy.

#### **RAI 6**

Attachment 5 of July 15, 2015 submittal, St. Lucie Unit 1, Snubber Testing Program Plan.

- (a) The proposed snubber program is for the fourth 10-year ISI interval. The fourth 10-year interval already started on February 11, 2008. Attachment 5 of the submittal stated that the proposed snubber program is applicable from February 11, 2008 through February 10, 2018. It is not clear to the NRC staff that how the proposed snubber program could be applicable from February 11, 2008 to the submittal date of July 15, 2015. It appears that the proposed snubber program can only be applicable starting from the submittal date of July 15, 2015 to the end of the fourth ISI interval of February 10, 2018. Please explain how the proposed snubber program would be applicable from February 11, 2008 to July 15, 2015.
- (b) Section 2.3 of the submittal states that “...The service life of all snubbers shall be monitored and snubbers evaluated, replaced, or reconditioned in accordance with OSP-73.01, QI-10-PR/PSL-6 and ISTD-6200 to ensure that the service life is not exceeded between surveillance inspections...” Please note that ISTD-6200 requires service life be evaluated at least once each fuel cycle. Explain the discrepancy and modify the subject sentence as appropriate.