



February 8, 2016

NG-16-0035
10 CFR 50.55a

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

Duane Arnold Energy Center
Docket No. 50-331
Renewed Op. License No. DPR-49

Notification of Deviation from Boiling Water Reactor Vessel and Internals Project (BWRVIP) Guidelines

- Reference: 1) Letter, C. Costanzo (NextEra Energy Duane Arnold, LLC) to U.S. NRC, "Notification of Deviation from Boiling Water Reactor Vessel and Internals Project Guidelines," NG-11-0092 dated March 31, 2011
- 2) BWR Vessel and Internals Project, BWR Core Plate Inspection and Flaw Evaluation Guidelines (BWRVIP-25), EPRI Report TR-107284, December 1996

The BWRVIP-25 inspection guidelines require that 50% of the core plate rim hold-down bolts of BWR/2-5 plants without repair wedges be examined by enhanced visual method (EVT-1) from below the core plate or by ultrasonic method (UT) from above the core plate. However, it was determined by the BWRVIP that the bolts cannot be examined by UT due to configuration issues and that an EVT-1 exam does not provide meaningful results. Accordingly, a technical justification for deviation was developed, and DAEC previously reported to the NRC (Reference 1) the need to deviate from the BWRVIP-25 inspection guidelines, with an anticipated deviation closure date of 2015.

The deviation disposition included analysis that concluded the bolting has a relatively low susceptibility to cracking. Even if significant cracking were to occur in the bolting, redundant structural components would prevent adverse displacement of the core plate. Furthermore, even with the conservative assumptions of failures of both the bolting and the redundant hardware, the Standby Liquid Control (SBLC) system could be used to bring the reactor to a safe shutdown.

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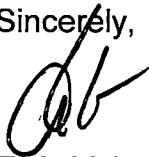
The BWRVIP is currently developing revised guidance for the core plate bolts; however, the BWRVIP recently informed the industry that revisions to the BWRVIP-25 inspection guidance will not be available in time to support NRC approval before the end of 2015. Therefore, DAEC has revised the deviation disposition due date and is providing this notification to the NRC. The deviation will remain in place until the revised BWRVIP core plate bolting inspection guidance is approved by the NRC or some other NRC approved solution is implemented. The technical bases behind the deviation disposition were not time limited and are not affected by this revision.

This notification is provided for information only and no NRC action is being requested.

No regulatory commitments are contained in this letter.

Questions regarding this matter should be directed to Michael Davis, Licensing Manager, at (319) 851-7032.

Sincerely,



T. A. Vehec
Vice President, Duane Arnold Energy Center
NextEra Energy Duane Arnold, LLC

cc: Regional Administrator, USNRC, Region III
Resident Inspector, USNRC, Duane Arnold Energy Center
Project Manager, USNRC, Duane Arnold Energy Center
Mr. Bob Carter, BWRVIP