



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 11, 2016

Mr. Ken J. Peters
Senior Vice President and
Chief Nuclear Officer (Acting)
Attention: Regulatory Affairs
Luminant Generation Company LLC
P.O. Box 1002
Glen Rose, TX 76043

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 2 – RELIEF REQUESTS B-15, C-2, AND C-4 FOR APPLICATION OF AN ALTERNATIVE TO THE ASME CODE, SECTION XI, WELD EXAMINATION REQUIREMENTS FOR REACTOR VESSEL HEAD, CONTAINMENT SPRAY HEAT EXCHANGER, AND RESIDUAL HEAT REMOVAL HEAT EXCHANGER DUE TO PHYSICAL INTERFERENCES FOR THE SECOND 10-YEAR INSERVICE INSPECTION INTERVAL (CAC NOS. MF6557, MF6558, AND MF6559)

Dear Mr. Peters:

By letters dated August 3, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML15224B365, ML15224B366, and ML15224B367), as supplemented by letter dated December 14, 2015 (ADAMS Accession No. ML16020A065), Luminant Generation Company LLC (the licensee) submitted Relief Requests (RRs) B-15, C-2, and C-4, respectively, to the U.S. Nuclear Regulatory Commission (NRC) for Comanche Peak Nuclear Power Plant (CPNPP), Unit 2, for the second 10-year inservice inspection (ISI) interval. The second 10-year ISI interval began on August 3, 2004, and ended on August 2, 2014.

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(g)(5)(iii), the licensee requested to use a proposed alternative to the examination requirements of American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI for the following welds since the ASME Code-required examination coverage was not achieved due to physical interferences:

- Reactor vessel (RV) head to disc weld (RR B-15)
- Containment spray (CS) heat exchanger (HX) shell circumferential weld (RR C-2)
- Residual heat removal (RHR) HX head-to-shell, shell-to-flange, inlet Nozzle-to-shell and outlet nozzle-to-shell welds (RR C-4)

The licensee stated that the geometry of the RV closure head ring to disc weld, CS HX, and RHR HX makes the ASME Code-required examination coverage requirements impractical. Ultrasonic testing of the subject welds was performed during the second 10-year ISI interval to the extent practical based on design configuration restrictions and VT-2 visual examinations were also performed with no evidence of leakage. The licensee stated that the proposed alternatives do not pose any undue risk to the public health and safety.

The NRC staff has completed its review of the proposed alternatives and based on the enclosed safety evaluation, the NRC staff concludes that for RR B-15, the licensee does not require relief since 100 percent volumetric examination of the accessible weld length was achieved. For RRs C-2 and C-4, as set forth in the enclosed safety evaluation, the NRC staff determined that granting relief pursuant to 10 CFR 50.55a(g)(6)(i) is authorized by law and will not endanger life or property, or the common defense and security, and is otherwise in the public interest given due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility. Furthermore, the NRC staff concludes that the ASME Code-required examinations were performed to the maximum extent possible and provide reasonable assurance of the structural integrity of the subject CS HX shell weld and RHR HX welds. Accordingly, the NRC staff concludes that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(g)(6)(i). Therefore, the NRC staff grants RRs C-2 and C-4 for the CPNPP, Unit 2, for the second 10-year ISI interval.

All other requirements of Section XI of the ASME Code for which relief was not specifically requested and approved in the subject relief requests remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

If you have any questions, please contact Margaret Watford at 301-415-1233 or via e-mail at Margaret.Watford@nrc.gov.

Sincerely,



Robert J. Pascarelli, Chief
Plant Licensing Branch IV-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-446

Enclosure:
Safety Evaluation

cc w/encl: Distribution via Listserv



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELIEF REQUESTS B-15, C-2, AND C-4

SECOND 10-YEAR INSERVICE INSPECTION INTERVAL

LUMINANT GENERATION COMPANY LLC

COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 2

DOCKET NO. 50-446

1.0 INTRODUCTION

By letters dated August 3, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML15224B365, ML15224B366, and ML15224B367), as supplemented by letter dated December 14, 2015 (ADAMS Accession No. ML16020A065), Luminant Generation Company LLC (the licensee) submitted Relief Requests (RRs) B-15, C-2, and C-4, respectively, to the U.S. Nuclear Regulatory Commission (NRC) for Comanche Peak Nuclear Power Plant (CPNPP), Unit 2, for the second 10-year inservice inspection (ISI) interval.

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(g)(5)(iii), the licensee requested to use the proposed alternative to the examination requirements of American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI for the following welds since ASME Code-required examination coverage was not achieved due to physical interferences:

- Reactor vessel (RV) head to disc weld (RR B-15)
- Containment spray (CS) heat exchanger (HX) shell circumferential weld (RR C-2)
- Residual heat removal (RHR) HX head-to-shell, shell-to-flange, inlet Nozzle-to-shell and outlet nozzle-to-shell welds (RR C-4)

The licensee stated that the geometry of the RV closure head ring to disc weld, CS HX, and RHR HX makes the ASME Code-required examination coverage requirements impractical. Ultrasonic testing (UT) of the subject welds was performed during the second 10-year interval to the extent practical based on design configuration restrictions and VT-2 visual examinations were also performed with no evidence of leakage.

2.0 REGULATORY EVALUATION

The ISI of ASME Code Class 1, 2, and 3 components is performed in accordance with Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," of the ASME

Enclosure

Code and applicable edition and addenda, as required by 10 CFR 50.55a(g). When conformance to these requirements are determined to be impractical, relief may be granted by the NRC pursuant to 10 CFR 50.55a(g)(6)(i). Additionally, pursuant to 10 CFR 50.55a(g)(6)(i), the NRC may impose such alternative requirements, as it determines is authorized by law, that will not endanger life or property or the common defense and security, and are otherwise in the public interest giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility.

Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2, and 3 components (including supports) shall meet the requirements, except the design and access provisions and the preservice examination requirements, set forth in the ASME Code, Section XI, to the extent practical within the limitations of design, geometry, and materials of construction of the components. The regulations require that inservice examination of components and system pressure tests conducted during the first 10-year interval and subsequent intervals comply with the requirements in the latest edition and addenda of Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(a) 12 months prior to the start of the 120-month interval, subject to the limitations and modifications listed in 10 CFR 50.55a(b)(2). The Code of record for CPNPP, Unit 2, for the second 10-year ISI interval is the 2000 Addenda to the 1998 Edition of the ASME Code, Section XI.

Paragraph 10 CFR 50.55a(g)(5)(iii) states, in part, that determinations of impracticality in accordance with this section must be based on the demonstrated limitations experienced when attempting to comply with the ASME Code requirements during the ISI interval for which the request is being submitted. Requests for relief made in accordance with this section must be submitted to the NRC no later than 12 months after the expiration of the initial or subsequent 120-month inspection interval for which relief is sought. The licensee submitted RRs B-15, C-2, and C-4 on August 3, 2015, for the second 10-year ISI interval of CPNPP, Unit 2, which started on August 3, 2004, and ended on August 2, 2014.

3.0 TECHNICAL EVALUATION

The information provided by the licensee in support of the subject RRs has been evaluated and the bases for disposition are documented in the following sections. The RRs have been evaluated according to ASME Code Examination Category and vessel shell type and information provided by the licensee in its letters dated August 3, 2015 (one each in support of RRs B-15, C-2, and C-4), and supplemented by letter dated December 14, 2015.

3.1 RR B-15, ASME Code, Section XI, Category B-A, Pressure Retaining Welds in RV, Item No. B1.21

ASME Code Component Affected

ASME Code Class: ASME Code Class 1
References: ASME Code, Section XI, Table IWB-2500-1 and IWB-3510
Examination Category: B-A
Item Number: B1.21
Description: ASME Code-required examination coverage for the weld volume is impractical
Component: RV Head to Disc Weld
Component Number: TCX-1-1300-2

ASME Code Requirements

The applicable ASME Code examination requirement for weld TCX-1-1300-2 is essentially 100 percent volumetric examination of the accessible weld length, as specified in Table IWB-2500-1, "Examination Categories," of the ASME Code, Section XI, Examination Category B-A, Item No. B1.21.

Basis for Relief

For weld TCX-1-1300-2, the licensee achieved 68 percent coverage of the required examination volume due to the presence of an insulation support shroud assembly. The design configuration restrictions in the region of weld TCX-1-1300-2 make the ASME Code-required examination coverage impractical. Plant modifications or replacements of components designed to allow for complete coverage would be needed to meet the ASME Code requirements.

NRC Staff Evaluation

The examination coverage achieved for weld TCX-1-1300-2 is 68 percent and is limited due to the presence of an insulation support shroud assembly. As required by ASME Code, Section XI, Examination Category B-A, Item No. B1.21 of Table IWB-2500-1, only the accessible areas of the weld length are required to be examined. By letter dated December 14, 2015, the licensee confirmed that essentially 100 percent of the accessible weld length, both parallel and transverse to the weld, was inspected. Therefore, the NRC staff determined that the relief from the ASME Code requirements is not needed. In its letter dated December 14, 2015, the licensee also acknowledged the fact that the requested relief is not required.

3.2 Relief Request C-2, ASME Code, Section XI, Category C-A, Item No. C1.10, Pressure Retaining Welds in Pressure Vessel (CS HX Shell)

ASME Code Component Affected

ASME Code Class: ASME Code Class 2
References: ASME Code, Section XI, Table IWC-2500-1
Examination Category: C-A
Item Number: C1.10
Description: CT HX 1-02 Shell to Flange Weld
Component: CS HX (CP1-CTAHCS-02)
Weld Number: TCX-2-1180-1-2

ASME Code Requirements

The applicable examination requirement for weld TCX-2-1180-1-2 is essentially 100 percent volumetric examination of the weld length, as specified in Table IWC-2500-1, "Examination Categories," of the ASME Code, Section XI, Examination Category C-A, Item No. C1.10. When 100 percent of the required volume cannot be examined due to interferences, obstructions, or geometrical configuration, ASME Code Case N-460, "Alternative Examination Coverage for Class 1 and Class 2 Welds, Section XI, Division 1," allows reduction of the examination volume to 90 percent of the required volume. ASME Code Case N-460 has been approved for use by the NRC in Regulatory Guide (RG) 1.147, Revision 17, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1," August 2014 (ADAMS Accession No. ML13339A689).

Basis for Relief

For weld TCX-2-1180-1-2, the licensee achieved 86 percent coverage of the required examination volume due to the configuration of the flange design and the proximity of two welded support plates on the shell side of the CS HX. The design configuration restrictions in the region of weld TCX-2-1180-1-2 make the ASME Code-required examination coverage impractical. Plant modifications or replacement of components designed to allow for complete coverage would be needed to meet the ASME Code requirements.

Licensee's Proposed Alternative (as stated by the licensee)

The following alternatives are proposed in lieu of the required examination coverage of essentially 100 percent:

1. Ultrasonic testing (UT) of the subject component weld was performed to the maximum extent practical during the second ten-year interval. No recordable indications were noted [in the areas examined].
2. Pressure test VT-2 visual examinations were performed, as required by [ASME] Code Category C-H, during the second ten-year interval. No evidence of leakage was identified for this component.

NRC Staff Evaluation

The examination coverage achieved for weld TCX-2-1180-1-2 is 86 percent and is limited due to the configuration of the flange design and the proximity of two welded support plates on the shell side of the CS HX. As such, obtaining the ASME Code-required examination volume would require significant modification of the CS HX shell or replacement of components designed to allow for complete coverage, which imposes a significant burden.

In its letter dated August 3, 2015, the licensee stated that the examination was performed with ultrasonic examination procedure TX-ISI-214, "Ultrasonic Examination Procedure for Welds in Piping Systems and Vessels." Additionally, by letter dated December 14, 2015, in response to RAI 4b from the NRC staff's request for additional information (RAI) dated November 13, 2015 (ADAMS Accession No. ML15317A158), the licensee stated that the subject weld was examined in accordance with Appendix III to Section XI of the ASME Code and that the requirements of Appendix III to Section XI of the ASME Code, along with the applicable supplements, were used in the preparation of procedure TX-ISI-214. The staff determined the licensee's response to the NRC staff question is acceptable.

Weld TCX-2-1180-1-2 was examined to the maximum extent possible from both sides of the weld, using 45-degree shear wave search units, scanning both parallel and perpendicular to the weld. The examination volumes included the weld and base materials near the inside surface of the weld joint, which are regions of high stress, and where one would expect degradation to be manifested, should it occur. The licensee stated that radiography testing would be impractical to perform due to access limitations, and phased array ultrasonic examination testing would not gain additional coverage because of the inherently large search units. No other means were attempted beyond the "best effort" ultrasonic examination. By letter dated December 14, 2015, the licensee provided information to support the NRC staff's conclusions (RAIs 2b, 3, and 5).

For weld TCX-2-1180-1-2, the ultrasonic examinations revealed no indications. By letter dated December 14, 2015, the licensee indicated that no plant-specific operating experience regarding potential degradation in the subject weld has been identified (RAI No. 6). Based on the examination coverage obtained for the subject weld, if significant service-induced degradation were occurring, the NRC staff concluded that there is reasonable assurance that evidence of degradation would be detected by the examination coverage achieved.

In addition to the volumetric UT examination, the licensee performed the required visual examination during system pressure testing in accordance with Examination Category C-H of Table IWC-2500-1 of Section XI of the ASME Code. The system pressure test in Examination Category C-H includes VT-2 visual examination for evidence of leakage, which provides reasonable assurance of leak tightness.

Based on the above discussion, the NRC staff concludes that obtaining the ASME Code required examination volume is impractical because it would impose significant burden upon the licensee. The NRC staff also determines that the volumetric UT examination performed to the maximum extent possible provides reasonable assurance of the structural integrity of weld TCX-2-1180-1-2. In addition, the VT-2 visual examination during pressure testing provides reasonable assurance of leak tightness of the subject weld and the alternative proposed by the licensee is acceptable.

3.3 Relief Request C-4, ASME Code, Section XI, Category C-A, Pressure Retaining Welds in Pressure Vessel, Item Nos. C1.10 and C1.20 and Category C-B, Pressure Retaining Nozzle Welds in Vessels, Item No. C2.21 (RHR HX Shell)

ASME Code Component Identification

ASME Code Class: ASME Code Class 2
References: ASME Code, Section XI, Table IWC-2500-1
Examination Categories: C-A and C-B
Item Numbers: C1.10, C1.20, C2.21
Descriptions: RHR HX Head-to-Shell Weld, RHR HX Shell-to-Flange Weld, RHR Heat EX Inlet Nozzle-to-Shell Weld, RHR HX Outlet Nozzle-to-Shell Weld
Component: RHR HX (TCX-2-1120)
Weld Numbers: TCX-2-1120-1-1, TCX-2-1120-1-2, TCX-2-1120-1-3, TCX-2-1120-1-4

ASME Code Requirements

As specified in Table IWC-2500-1 of the ASME Code, Section XI, Examination Category C-A, Item Nos. C1.10 and C1.20 and Examination Category C-B, Item No. C2.21, the applicable examination requirements for the welds of the RHR HX shell are shown below. When 100 percent of the required volume cannot be examined due to interferences, obstructions, or geometrical configuration, ASME Code Case N-460 allows reduction of the examination volume to 90 percent of the required volume.

| Weld No. | Examination Category | Item No. | Examination Requirement |
|----------------|----------------------|----------|--|
| TCX-2-1120-1-1 | C-A | C1.20 | Essentially 100% volumetric examination of the weld length |
| TCX-2-1120-1-2 | C-A | C1.10 | Essentially 100% volumetric examination of the weld length |
| TCX-2-1120-1-3 | C-B | C2.21 | Surface and volumetric examination as defined in either Figure IWC-2500-4(a) or (b) of the ASME Code, Section XI |
| TCX-2-1120-1-4 | C-B | C2.21 | Surface and volumetric examination as defined in either Figure IWC-2500-4(a) or (b) of the ASME Code, Section XI |

Basis for Relief

For the welds of the RHR HX shell, the licensee achieved less than 90 percent coverage of the required examination volume as shown below. For welds TCX-2-1120-1-1 and TCX-2-1120-1-2, the limitation is due to the configuration of welded supports and bolt flange.

For welds TCX-2-1120-1-3 and TCX-2-1120-1-4, the limitation is due to the nozzle-to-vessel shell configuration. The restrictions of the design configuration of the four welds above make the ASME Code-required examination coverage impractical. Plant modifications or replacements of components designed to allow for complete coverage would be needed to meet the ASME Code requirements.

| Weld No. | Examination Category | Item No. | Examination Coverage Achieved |
|----------------|----------------------|----------|-------------------------------|
| TCX-2-1120-1-1 | C-A | C1.20 | 75% |
| TCX-2-1120-1-2 | C-A | C1.10 | 63% |
| TCX-2-1120-1-3 | C-B | C2.21 | 75% |
| TCX-2-1120-1-4 | C-B | C2.21 | 75% |

Licensee's Proposed Alternative (as stated by the licensee)

The following alternatives are proposed in lieu of the required examination coverage of essentially 100 percent:

1. Ultrasonic testing (UT) of the subject component weld was performed to the maximum extent practical during the second ten-year interval.
2. Liquid penetrant, and pressure test VT-2 visual examinations were performed, as required by [ASME] Code Category C-H, during the second ten-year interval. No indication or evidence of leakage was identified for this component.

NRC Staff Evaluation

The examination coverages achieved for welds TCX-2-1120-1-1 and TCX-2-1120-1-2 are less than 90 percent of the required volume and are limited due to the configuration of welded supports and proximity to the bolt flange. The examination coverages achieved for welds TCX-2-1120-1-3 and TCX-2-1120-1-4 are also less than 90 percent of the required volume and are limited due to the nozzle-to-vessel shell configuration. As such, obtaining the ASME Code-required examination volumes would require significant plant modification to the RHR HX or replacement of components designed to allow for complete coverage, which imposes a significant burden.

The licensee stated that the examination was performed with ultrasonic examination procedure TX-ISI-214, which is the same procedure used in the examination of weld TCX-2-1180-1-2 discussed in Section 3.2 of this safety evaluation (SE). Thus, the NRC staff's RAI 4b and the licensee's response to it by letter dated December 14, 2015, also apply to the welds covered by RR C-4. The licensee stated in its response to RAI 4b that the subject welds were examined in accordance with Appendix III to Section XI of the ASME Code and that the requirements of Appendix III to Section XI of the ASME Code, along with the applicable supplements, were used in the preparation of procedure TX-ISI-214.

Weld TCX-2-1120-1-1 was examined to the maximum extent possible, from both sides of the weld, with 45-degree shear wave search units, scanning both parallel and perpendicular to the weld. Welds TCX-2-1120-1-2, TCX-2-1120-1-3, and TCX-2-1120-1-4 were examined to the maximum extent possible from one side of the welds, with 45-degree and 60-degree shear wave search units, scanning both parallel and perpendicular to the welds. For welds TCX-2-1120-1-3 and TCX-2-1120-1-4, 60-degree refracted longitudinal waves search units were also used for supplemental "best effort" ultrasonic examination. The licensee stated that radiography testing would be impractical to perform due to access limitations, and phased array ultrasonic examination testing would not gain additional coverage because of the inherently large search units. Surface examinations were performed using liquid penetrant testing (PT) for the subject welds in RR C-4 although they are required only for welds TCX-2-1120-1-3 and TCX-2-1120-1-4. By letter dated December 14, 2015, the licensee provided information in its responses to RAI 2c, RAI 3, and RAI 5 to support the NRC staff's conclusions.

For the welds covered by RR C-4, the ultrasonic examinations and PT examinations revealed no indications and no evidence of leakage. By letter dated December 14, 2015, in its response to the NRC staff's RAI 6, the licensee indicated that no plant-specific operating experience regarding potential degradation in the subject welds has been identified. Based on the examination coverage obtained for the subject welds, the NRC staff concluded that there is reasonable assurance that evidence of degradation would be detected by the examination coverages achieved, if significant service-induced degradation were occurring.

In addition to the volumetric UT examination and surface PT examination, the licensee performed the required visual examination during system pressure testing in accordance with Examination Category C-H of Table IWC-2500-1 of Section XI of the ASME Code. The system pressure test in Examination Category C-H includes VT-2 visual examination for evidence of leakage, which provides reasonable assurance of leak tightness.

Based on the above discussion, the NRC staff determines that obtaining the ASME Code-required examination volume is impractical because it would impose significant burden upon the licensee. The NRC staff also determines that the volumetric UT examinations, performed to the maximum extent possible, provide reasonable assurance of the structural integrity of welds TCX-2-1120-1-1, TCX-2-1120-1-2, TCX-2-1120-1-3, and TCX-2-1120-1-4. In addition, the VT-2 visual examination during pressure testing and liquid PT surface examination provide reasonable assurance of leak tightness of the subject welds and the alternative proposed by the licensee is acceptable.

4.0 CONCLUSION

As discussed in Section 3.1 of this SE, the NRC staff determines that granting of relief to RR B-15 is not necessary, since 100 percent volumetric examination of the accessible weld length was achieved. For RRs C-2 and C-4, as set forth in the SE, the NRC staff determines that granting relief pursuant to 10 CFR 50.55a(g)(6)(i) is authorized by law and will not endanger life or property, or the common defense and security, and is otherwise in the public interest given due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility. Furthermore, the NRC staff concludes that the ASME Code-required examinations were performed to the maximum extent possible and provide reasonable assurance of the structural integrity of the subject CS HX shell weld and RHR HX welds. Accordingly, the NRC staff concludes that the licensee has adequately addressed all of

the regulatory requirements set forth in 10 CFR 50.55a(g)(6)(i). Therefore, the NRC staff grants RRs C-2 and C-4 for the CPNPP, Unit 2, for the second 10-year ISI interval, which began on August 3, 2004, and ended on August 2, 2014.

All other requirements of Section XI of the ASME Code for which relief was not specifically requested and approved in the subject relief requests remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

Principal Contributor: David Dijamco, NRR/DE/EVIB

Date: March 11, 2016

The NRC staff has completed its review of the proposed alternatives and based on the enclosed safety evaluation, the NRC staff concludes that for RR B-15, the licensee does not require relief since 100 percent volumetric examination of the accessible weld length was achieved. For RRs C-2 and C-4, as set forth in the enclosed safety evaluation, the NRC staff determined that granting relief pursuant to 10 CFR 50.55a(g)(6)(i) is authorized by law and will not endanger life or property, or the common defense and security, and is otherwise in the public interest given due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility. Furthermore, the NRC staff concludes that the ASME Code-required examinations were performed to the maximum extent possible and provide reasonable assurance of the structural integrity of the subject CS HX shell weld and RHR HX welds. Accordingly, the NRC staff concludes that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(g)(6)(i). Therefore, the NRC staff grants RRs C-2 and C-4 for the CPNPP, Unit 2, for the second 10-year ISI interval.

All other requirements of Section XI of the ASME Code for which relief was not specifically requested and approved in the subject relief requests remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

If you have any questions, please contact Margaret Watford at 301-415-1233 or via e-mail at Margaret.Watford@nrc.gov.

Sincerely,

/RA/

Robert J. Pascarelli, Chief
 Plant Licensing Branch IV-1
 Division of Operating Reactor Licensing
 Office of Nuclear Reactor Regulation

Docket No. 50-446

Enclosure:
 Safety Evaluation

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* Memo dated February 24, 2016

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