NRR-PMDAPEm Resource

From: Klos, John
Sent: Thursday, July 07, 2016 1:17 PM
To: Williams, Lisa L.
Cc: Klos, John
Subject: RAI issuance for MF7358 Relief Request Reactor Pressure Vessel Flange Leak-off Code Case N-805

Ms. Williams,

By letter dated February 17, 2016, Agencywide Documents Access and Management System (ADAMS) Accession No. ML16054A797, Energy Northwest (the licensee) submitted a relief request related to system leakage test of the reactor pressure vessel flange leak-off lines and Code Case N-805.

The Nuclear Regulatory Commission (NRC) staff has reviewed the submittal and has determined that requests for additional information (RAIs) are needed to complete its technical review and make a regulatory finding regarding this relief request.

The draft questions were sent on July 5, 2016 and it was determined that no clarification call was necessary and upon issuance these RAIs could be responded to
in 32 days from today's issuance. Hence, the issued RAIs below are due Monday August 8, 2016.

REQUEST FOR ADDITIONAL INFORMATION
RELIEF REQUEST 4ISI-05 REGARDING REACTOR PRESSURE VESSEL
FLANGE LEAK-OFF LINES AND CODE CASE N-805
ENERGY NORTHWEST
COLUMBIA GENERATING STATION
DOCKET NUMBER 50-397

Background:

By letter dated February 17, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML16054A797), Energy Northwest (the licensee), submitted for
staff review and approval inservice inspection (ISI) Program Relief Request 4ISI-05, which requests an alternative to the American Society of Mechanical Engineers (ASME) Section XI
code requirements of sub-articles IWB-5220 and IWC-5221 for pressure testing of the Class 1 and Class 2 reactor vessel flange leak-off line components during each inspection period.

Regulatory Basis:

Pursuant to Title 10 of the Code of Federal Regulations (10 CFR), Part 50, paragraph 55a(g)(4), Inservice Inspection Requirements, 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, "Rules for Inservice Inspection of Nuclear Power Plant Components," 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 inspection interval and subsequent 10-year inspection 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(b), 12 months prior to the start of the 120-month inspection interval, subject to the limitations and modifications listed therein.

Paragraph 55a(a)(3) of 10 CFR Part 50 states, in part, that alternatives to the requirements of 10 CFR 50.55a(g) may be used, when authorized by the NRC, if (i) the proposed alternatives would provide an acceptable level of quality and safety or (ii) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Questions:

In order to complete its review, the U.S. Nuclear Regulatory Commission (NRC) staff requests the following additional information:

1. What actions will be taken when using the proposed alternative to ensure the leak-off lines are clear of air prior to performance of the VT-2 examination?

2. The NRC staff would like to verify that the Class 1 portion of the head leak-off line will continue to be VT-2 examined each refueling outage in accordance with IWB-5222(a)
and Inspection Item No. B15.10.

3. According to the ASME Pressure Vessel Code, Section XI, Examination Category C-H, Table IWC-2500-1, Item C7.10, examinations are required to be performed each period.
Section XI, Table IWB-2500-1, Examination Category Item B15.10 requires examination each refueling outage and Item B15.20 requires examination once per interval. Given
that the methodology of the proposed alternative pressurizes both Class 1 and Class 2 portions of the head leak-off line simultaneously, and the staff believes this condition
occurs every refueling outage will this methodology be used to pressure test and VT-2 examine the Class 2 portion each inspection period?

John Klos
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Tracking Status: None
"Williams, Lisa L." <llwilliams@energy-northwest.com>
Tracking Status: None

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