

NRR-PMDAPEm Resource

From: Poole, Justin
Sent: Monday, August 01, 2016 1:45 PM
To: Mascitelli, Francis J:(GenCo-Nuc)
Subject: DRAFT RAIs on RR-16-01
Attachments: CodeCase 720 DRAFT RAIs.docx

Frank,

By letter dated May 27, 2016 (ADAMS Accession Numbers ML16148A109), Exelon Generation Company (Exelon), submitted a relief request to utilize Code Case N-722-2 in place of Code Case N-722-1 for Three Mile Island Nuclear Station, Unit 1. In reviewing Exelon's request, the NRC staff has developed the attached DRAFT request for additional information (RAI). Please review to ensure that the RAI 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. If further clarification is needed, and you would like to discuss the questions in a conference call, let us know. This email does not convey a formal NRC staff position, and it does not formally request for additional information.

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"Mascitelli, Francis J:(GenCo-Nuc)" <Francis.Mascitelli@exeloncorp.com>
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REQUEST FOR ADDITIONAL INFORMATION
RELIEF REQUEST RR-16-01 REGARDING
ALTERNATE EXAMINATIONS OF WELDS AT THE BOTTOM OF THE REACTOR VESSEL
EXELON GENERATION COMPANY
THREE MILE ISLAND NUCLEAR STATION UNIT 1
DOCKET NO. 50-289

By letter dated May 27, 2016 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML16148A109), Exelon Generation Company (the licensee) requested to utilize Code Case N-722-2 in place of Code Case N-722-1 of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) as conditioned in Title 10, *Code of Federal Regulation* (10 CFR), Part 50, 10 CFR 50.55a(g)(6)(ii)(E) at Three Mile Island Nuclear Station, Unit 1. The licensee submitted Relief Request Number RR-16-01 regarding the alternate examination of nozzle-to-adapter welds at the bottom of the reactor vessel.

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

1. Table 1 of the relief request identifies weld number RCT0001INCORENOZZLES and number "52" as reactor vessel lower head incore penetrations. Discuss the total number of nozzle-to-adapter weld(s) that are covered under the relief request.
2. The licensee submitted Relief Request RR-16-01 pursuant to 10 CFR 50.55a(z)(1) which states that the proposed alternatives would provide an acceptable level of quality and safety. It is not clear to the NRC staff that the relief request would provide an acceptable level of quality and safety when the subject welds will not be inspected under the proposed alternative. The NRC staff suggests that the relief request be submitted under 10 CFR 50.55a(z)(2) which states that compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. Under 10 CFR 50.55a(z)(2), the licensee would need to discuss the hardship or unusual difficulty associated with performing examinations of the subject welds per ASME Code Case N-722-1.
3. The licensee stated that a VT-2 visual examination will be performed on the subject welds to monitor leakage when the routine system leakage test is performed every refueling outage. The NRC staff understands that the area below the reactor vessel has high radiation and temperature. Describe in detail how the plant examiner performs the VT-2 visual examination of the subject welds. For example, does the plant examiner have the access to the bottom of the reactor vessel; where the examiner will be physically located to observe the welds; how will leakage be observed; does the examiner has a direct eye sight with short distance to the welds?

Enclosure