

NRR-PMDAPem Resource

From: Klos, John
Sent: Thursday, August 11, 2016 2:07 PM
To: Williams, Lisa L.
Cc: Klos, John
Subject: RE: Second round RAI issuance for MF7154 Relief Request 4ISI-02, Use of Code Case N-795 following Repair/replacement activities

Ms. Williams,

By letter dated December 10, 2015, Agencywide Documents Access and Management System (ADAMS) Accession No. ML15344A519, Energy Northwest (the licensee) submitted a relief request related to the use of Code Case N-795 following Repair/Replacement activities.

The Nuclear Regulatory Commission (NRC) staff has reviewed the submittal has determined that requests for additional information (RAIs) were needed to complete its technical review and make a regulatory finding regarding this relief request. RAIs were issued on June 23, 2016 Accession No. ML16176A011 and responses were received on July 14, 2016 Accession No. ML16196A418 which led to the creation of the second round RAI below.

The draft questions were sent on August 5, 2016 and a clarification call was held on August 11, 2016 where the licensee and the NRC agreed that a response would occur in 32 days from the date of this email, on Monday September 12, 2016.

**2ND ROUND REQUEST FOR ADDITIONAL INFORMATION
MF7154 RELIEF REQUEST 4ISI-02
REGARDING SYSTEM LEAKAGE TEST
FOLLOWING REPAIR/REPLACEMENT ACTIVITIES
ENERGY NORTHWEST
COLUMBIA GENERATING STATION
DOCKET NUMBER 50-397**

Background:

By letter dated December 10, 2015, Agencywide Documents Access and Management System (ADAMS) Accession Number ML15344A519, as supplemented by letter dated, July 14, 2016 ADAMS Accession Number ML16196A418, Energy Northwest (the licensee) requested relief from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (B&PV Code) specifically related to the pressure test of the Class 1 components in the containment, excluding the reactor pressure vessel (RPV), following repair/replacement activities (e.g., in an unscheduled maintenance event or a forced outage event) prior to return the plant to service at the Columbia Generating Station (Columbia). In this relief request 4ISI-02, an alternative pressure test is proposed (i.e., to implement provisions that are similar to ASME Code Case N-795 "Alternative Requirements for [Boiling Water Reactor] BWR Class 1 System Leakage Test Pressure Following Repair/Replacement Activities, Section XI, Division 1").

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.

Pursuant to 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.

Pursuant to Title 10 of the Federal Code of Regulations (10 CFR) 50.55a(b)(2)(xxvi), Section XI condition: Pressure testing Class 1, 2, and 3 mechanical joints. The repair and replacement activity provisions in IWA-4540(c) of the 1998 Edition of Section XI for pressure testing Class 1, 2, and 3 mechanical joints must be applied when using the 2001 Edition through the latest edition and addenda incorporated by reference in paragraph (a)(1)(ii) of this section.

Request:

In the licensee's response, dated July 14 2016, to NRC RAI 2 the licensee stated that "... Mechanical joints will be subjected to relief request 4ISI-02 in the following manner. If the alternative requirements to American Society of Mechanical Engineers (ASME) Section XI IWA-4000 which are contained in IWA-4131, IWA-4132, or ASME Code Case N-508-4 are utilized, no ASME Section XI pressure test and VT-2 visual examination will be performed..."

The NRC staff notes that, as written the licensee's response appears to deviate from the pressure testing requirements of the 1998 edition of the ASME code, as mandated by 10 CFR 50.55a(b)(2)(xxvi), "Section XI Condition: Pressure Testing Class 1, 2 and 3 Mechanical Joints". To date, the NRC staff has found deviations from this requirement to be unacceptable.

To complete its review, the NRC staff requests that the licensee;

Please explain why the licensee's response to NRC RAI 2 relative to the requirements of 10 CFR 50.55a(b)(2)(xxvi) appears to deviate from the requirements? If the proposed response is not identical to those required by 10 CFR 50.55a(b)(2)(xxvi) please either amend the response to RAI 2 or provide justification for the proposed testing.

Thank you,

John Klos
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