

NRR-PMDAPem Resource

From: Haskell, Russell
Sent: Thursday, August 18, 2016 4:49 PM
To: McHale, John; Sheng, Simon; Cheruvenki, Ganesh; Miller, Ed; Roach, Gregory; 'Mitchel.Mathews@exeloncorp.com'
Cc: Fairbanks, Carolyn; Elliott, Roy
Subject: (CAC Nos. MF8090/MF8091) DNPS, Units 2 and 3 - Proposed Alternative for Inservice Inspection Interval (I5R-08)

All,

On Wednesday August 17, 2016, staff from the NRC and Exelon Generation Co. (EGC) held a teleconference to discuss the acceptance review re: Dresden Nuclear Power Station, Unit Nos. 2 and 3 proposed alternative for the 5th 10-year inservice inspection (ISI) interval (I5R-08).

A summary of the exchange includes the following:

- The discussion focused on the NRC's review of EGC's proposed alternative (I5R-08).
- The NRC staff, in its acceptance review of the submittal, initially understood that EGC was requesting to use an alternative to the ASME code that limited the frequency of examination of the subject welds to 25% of the welds for the remaining period of operation for Dresden, Units 2 and 3 (i.e., through 2029 and 2031, respectively), in its entirety. The NRC staff indicated this appeared to be contrary to the basis of previous NRC approvals, for similar proposed alternative requests across the fleet.
- EGC responded that it was not intended for the proposed alternative to modify the frequency of exams as evaluated under BWRVIP-241 (i.e., examine 25% of the subject nozzles during each of the remaining 120-month inservice inspection intervals).
- EGC plans to continue to meet the inspection frequency requirements for Code Case N-702 nozzle examinations for the remaining period of extended operation for Dresden, Units 2 and 3 (i.e., December 22, 2029, and January 12, 2031, respectively).
- EGC stated the submittal will be supplemented to clarify that the inspection interval, as discussed in Section 5 of Attachment 1 of the submittal, was intended to indicate the remaining 5th and 6th 120-month inservice inspection (ISI) intervals, and that all required nozzle types identified in I5R-08 will continue to be examined in accordance with the conditions for the implementation of Code Case N-702, as defined in NRC Regulatory Guide 1.147, Rev. 17, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1," for the Dresden, Units 2 and 3 remaining period of extended operation.
- Based on EGC's request to receive NRC approval to implement Code Case N-702 for the remaining period of Dresden, Units 2 and 3 period of extended operation, EGC does not intend to resubmit a request to implement Code Case N-702 for the Dresden, Units 2 and 3 for the upcoming 6th ISI interval to the NRC. The NRC acknowledged this and commented that could be acceptable, however there may be (unforeseen) technical questions raised during the technical review (provided the NRC finds the supplemental information adequate to perform a technical review). In particular, questions could arise regarding the treatment of examination results for the subject welds and any requisite examination scope expansions that the indications might trigger.
- As noted above, the staff concern was resolved when EGC stated that the current 5th and 6th 10-year ISI intervals would continue to implement the examination of 25% of the identified welds during each 10-year ISI interval frequency, and that the examination requirements for Code Case N-702 would

continue to be met for each nozzle type I.A.W the I5R-08 submittal. EGC indicated this would be clarified in a supplement to the submittal.

- The NRC staff informed EGC that a letter will be transmitted (and docketed) summarizing the necessary requirements for the NRC to accept EGC's proposed alternative (I5R-08), in order to proceed with a more detailed review. EGC acknowledged these requirements and committed to responding to the NRC within a response period established to by September 6, 2016, via submittal of supplemental information.

Participants included:

NRC - Jack McHale, Engineering Vessels and Internals Integrity Branch, Chief
NRC - Dr. Simon Sheng, Engineering Vessels and Internals Integrity Branch, Engineer
NRC - Ganesh Cheruvenki, Engineering Vessels and Internals Integrity Branch, Engineer
NRC - Ed Miller, Operating Reactor Licensing Branch LPL 3-2, Chief (A)
NRC - Gregory Roach, Dresden Nuclear Power Station, NRC Senior Resident Inspector
NRC - Russell Haskell, Operating Reactor Licensing Branch LPL 3-2, Project Manager
EGC - Gene Navratil – Corporate Engineering Programs
EGC - Patrick Simpson – Corporate Licensing Manager
EGC - John N. Kish – Dresden ISI Program Manager
EGC - Alex Rehn – Dresden Regulatory Assurance
EGC - Mitch Mathews – Corporate Licensing

Russell S. Haskell II

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Dresden Nuclear Power Station, Units 2 and 3

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