

James, Lois

From: James, Lois
Sent: Tuesday, August 23, 2016 9:49 AM
To: gtpowell@STPEGS.COM
Cc: James, Lois; Diaz-Sanabria, Yoira K; Tran, Tam; Holston, William; Homiack, Matthew; Hovanec, Christopher; Morey, Dennis; McIntyre, David; Regner, Lisa; Taylor, Nick; Proulx, David; Janicki, Steven; Money, Shawn; Sanchez, Alfred; Hernandez, Nicholas; Maier, Bill; Dricks, Victor; Pick, Greg; Graves, Samuel; Aldridge, Arden J; 'Gonzales, Rafael'; Sterling, Lance; Murray, Michael; RidsNrrDlr Resource; RidsNrrDlrRpb1 Resource; RidsNrrDlrRerb Resource; RidsNrrDlrRarb Resource; RidsNrrDlrRasb Resource; RidsNrrDlrRsrq Resource; RidsNrrPMSouthTexas Resource; RidsOgcMailCenter Resource; Wentzel, Michael
Subject: SUMMARY OF A CONFERENCE CALL HELD ON AUGUST 18, 2016, BETWEEN THE NRC AND STPNOC, CONCERNING THE ALUMINUM BRONZE SELECTIVE LEACHING AGING MANAGEMENT PROGRAM IN THE SOUTH TEXAS PROJECT, LICENSE RENEWAL APPLICATION (TAC. NOS. ME4936 AND ME4937)
Attachments: Summary of Conference Call on August 18, 2016, re clarification to Al-Brz Selective Leaching AMP - enclosure 1.pdf; Summary of Conference Call on August 18, 2016, re clarification to Al-Brz Selective Leaching AMP - enclosure 2.pdf

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



August 23, 2016

LICENSEE: STP Nuclear Operating Company
FACILITY: South Texas Project
SUBJECT: SUMMARY OF A CONFERENCE CALL HELD ON AUGUST 18, 2016, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND STP NUCLEAR OPERATING COMPANY, CONCERNING THE ALUMINUM BRONZE SELECTIVE LEACHING AGING MANAGEMENT PROGRAM IN THE SOUTH TEXAS PROJECT, LICENSE RENEWAL APPLICATION (TAC. NOS. ME4936 AND ME4937)

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of STP Nuclear Operating Company (STPNOC or the applicant) held a telephone conference call on August 18, 2016, to clarify changes made to Aluminum Selective Leaching Aging Management Program as amended by letter dated July 28, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16221A391).

Enclosure 1 provides a listing of the participants and Enclosure 2 contains a listing of the items discussed with the applicant, including a brief description on their status.

The applicant had an opportunity to comment on this summary.

Lois M. James, Sr. Project Manager
Projects Branch 1

Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosures:

1. List of Participants
2. Summary of Telephone Conference Call

cc w/encl: Listserv

ADAMS Accession No.: ML16236A032

*concurrence via email

OFFICE	PM:RPB1:DLR	RARB:DLR	PM:RPB1:DLR	BC:RPB1:DLR	PM:RPB1:DLR
NAME	LJames	WHolston*	MWentzel*	YDiaz-Sanabria LMJ for	LJames
DATE	8/22/2016	8/23/2016	8/23/2016	8/23/2016	8/23/2016

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**TELEPHONE CONFERENCE CALL
SOUTH TEXAS PROJECT
LICENSE RENEWAL APPLICATION**

LIST OF PARTICIPANTS
AUGUST 18, 2016

<u>PARTICIPANT</u>	<u>AFFILIATION</u>
Lois M. James	U.S. Nuclear Regulatory Commission (NRC)
William Holston	NRC
Christopher Hovanec	NRC
Brian Allik	NRC
Arden Aldridge	South Texas Project Nuclear Operating
Rafael Gonzales	STPNOC
Rob Engen	STPNOC
Richard Kersey	STPNOC
Russ Cipolla	Intertek
Gary Warner	Worley Parsons

SUMMARY OF TELEPHONE CONFERENCE CALL
SOUTH TEXAS PROJECT
LICENSE RENEWAL APPLICATION

AUGUST 18, 2016

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of South Texas Project (STP) Nuclear Operating Company (STPNOC or the applicant) held a telephone conference on August 18, 2016, to clarify changes made to Aluminum Selective Leaching Aging Management Program (AMP) as amended by letter dated July 28, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16221A391).

Background:

By letter dated October 25, 2010 (Accession No. ML103010256), the applicant submitted a License Renewal Application (LRA) pursuant to Title 10 of the *Code of Federal Regulations* (CFR) Part 54 for review by the U.S. Nuclear Regulatory Commission (NRC or the staff), to renew operating licenses NPF-76 and NPF-80 for South Texas Project, Units 1 and 2, for an additional 20 years.

By letter dated July 28, 2016, the applicant amended the plant-specific AMP which addresses selective leaching of aluminum bronze. The revisions to the program were based on a public meeting that was held between the NRC staff and the applicant on June 21, 2016 (ADAMS Package Accession No. ML16180A015), and a telephone conference held on July 5, 2016 (ADAMS Package Accession No. ML16188A012).

Discussion:

1. Modification to the "Corrective Actions" Program Element of the Selective Leaching of Aluminum Bronze Program

The staff noted that the "corrective actions" program element of the Selective Leaching of Aluminum Bronze Program was modified by letter dated July 28, 2016 (ADAMS Accession No. ML16221A391). Specifically, the staff noted that the "corrective actions" program element does not state the specific corrective actions that will be taken if the results of a structural integrity evaluation are not acceptable. The staff recognizes that a structural integrity evaluation will be performed if: (a) there is a through-wall leak of an above or below ground weld; (b) an aluminum bronze weld is found to have an indication that does not meet acceptance criteria; or (c) a destructive examination does not meet acceptance criteria. The structural integrity evaluation is performed in order to confirm that the load carrying capacity of the welds that are still in-service remain adequate to support the intended function of the essential cooling water (ECW) system.

The staff stated that a generic reference to entering the failure of the structural integrity evaluation in corrective action program was insufficient detail for the staff to reach a conclusion that reasonable assurance that the ECW system will meet its intended function exists. The staff suggested that appropriate corrective actions could be but are not limited to shortening the duration between visual inspections and addressing functionality of a header if a leaking weld is detected. No conclusions or clarifications were reached during this discussion. The staff and the applicant agreed to potentially hold a separate telecom on this question.

2. Modification to the “Acceptance Criteria” for Destructive Examinations

The staff noted that the Selective Leaching of Aluminum Bronze AMP “acceptance criteria” program element was revised by letter dated July 28, 2016 (ADAMS Accession No. ML16221A391) to state, in part, that:

The acceptance criterion for destructive examinations is no loss of material due to selective leaching penetrating 80% of the root-pass region and non-propagating (surrounded by a resistant phase distribution). The microstructure of the weld root region exhibits a non-continuous phase distribution consistent with the metallurgical technical basis report.

Further, the staff noted that the Selective Leaching of Aluminum Bronze AMP “corrective actions” program element states, in part, that when, “[a] destructive examination does not meet acceptance criteria. Perform five additional destructive examinations until no unacceptable selective leaching is found to assess extend of condition and cause.”

Based on the information provided, the staff stated that it is unclear if the acceptance criteria for destructive examinations includes phase distribution. The corrective actions and expansion criteria associated with not meeting the phase distribution acceptance criteria are also unclear. The staff stated that an appropriate phase distribution was central to demonstrating that the root pass of welds is less susceptible to selective leaching.

The applicant agreed to integrate the words “phase distribution” into the AMP.

3. Modification to the “Parameters Monitored and Inspected” Program Element of the Selective Leaching of Aluminum Bronze Program

The staff noted that the “parameters monitored and inspected” program element of the Selective Leaching of Aluminum Bronze program was revised by letter dated July 28, 2016 (ADAMS Accession No. ML16221A391) to state that the welds subject to volumetric examination will be selected based on, “construction and size distributions.” Further, the staff noted this program element also states that the welds subject to destructive examination will be randomly selected.

The staff requested clarification on the basis for not providing a reason for why the welds subject to destructive examination would be randomly selected. Parameters that could impact the susceptibility of the final weld properties should be considered.

The applicant agreed to revise the AMP to address the selection of welds to be destructively examined.

4. Components in the “Scope of Program” Program Element of the Selective Leaching of Aluminum Bronze Program

The staff noted that Enclosure 1 of the letter dated July 28, 2106 (ADAMS Accession No. ML16221A391), describes how the extruded tee weld repair sizes will be characterized. However, the “scope of program” program element of the Selective Leaching of Aluminum Bronze program does not include how the extruded tee weld repair sizes will be characterized. The staff requested clarification.

The applicant stated that the AMP would be include a description of how the extruded tee weld repair sizes will be characterized under the “scope of program” program element.

5. Modification to the “Detection of Aging Effects” Program Element of the Selective Leaching of Aluminum Bronze Program

The staff noted that the “detection of aging effects” program element was modified by letter dated July 28, 2016 (ADAMS Accession No. ML16221A391) to require that a volumetric examination be conducted to determine if loss of material or cracking has occurred in the vicinity of degraded coatings on buried ECW piping. The volumetric examinations is also cited in Commitment No. 39. The staff requested clarification on how loss of material due to selective leaching will be detected by volumetric inspections. In addition, the staff noted that there is no acceptance criteria for the extent of loss of material due to selective leaching of the external surfaces of buried ECW piping.

The applicant stated that it understood the clarification and would revise the program element.

6. Consistency between the UFSAR Supplement and Selective Leaching of Aluminum Bronze Program

The staff noted that LRA Section A1.37 was modified by letter dated July 28, 2016 (ADAMS Accession No. ML16221A391) to state that visual inspections will be conducted every six months, not to exceed nine months. The staff further noted that LRA Section B2.1.37 states that visual inspections will be conducted every six months. The staff requested clarification on this inconsistency.

The applicant stated that it understood the clarification and would revise the program element.