

## **NRR-PMDAPem Resource**

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**From:** Klos, John  
**Sent:** Tuesday, August 23, 2016 7:15 AM  
**To:** Williams, Lisa L.; Garcia, Richard M.  
**Cc:** Klos, John; Burkhardt, Janet; Blechman, Paula  
**Subject:** Request for Additional Information, Columbia N-666-1, Relief Request 4ISI-06, Use of Code Case N-666-1 on Socket Welded Connections CAC MF7368

Ms. Williams,

By letter dated February 17, 2016, Agencywide Documents Access and Management System (ADAMS) Accession No. ML16053A183, Energy Northwest (the licensee) submitted a relief request related to the use of Code Case N-666-1 on Socket Welded Connections.

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 Aug 16, 2016 and it was determined that no clarification call was necessary and upon issuance these RAIs could be responded to in 30 days from today's date. Hence, the issued RAIs below are due Thursday September 22, 2016.

REQUEST FOR ADDITIONAL INFORMATION  
RELIEF REQUEST 4ISI-06  
COLUMBIA GENERATING STATION  
ENTERGY NORTHWEST  
DOCKET NO. 50-397  
(TAC NO. MF7368)

**Background:**

By letter dated February 17, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16053A183, Entergy Northwest requested the U.S. Nuclear Regulatory Commission (NRC) to authorize the use of Code Case N-666-1 "Weld Overlay of Class 1, 2, and 3 Socket Welded Connections, Section XI, Division 1," of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), to restore structural integrity of cracked or leaking socket welds in Class 1, 2, and 3, nominal pipe size 2 and smaller piping, resulting from vibration fatigue. Code Case N-666-1 is not currently listed in Regulatory Guide 1.147, Inservice Inspection Code Case Acceptability, ASME 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(z) 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 (1) the proposed alternatives would provide an acceptable level of quality and safety or (2) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Request:

To complete its review NRC staff requests the following additional information.

1. The NRC requests that the licensee verify that the code of construction for all components that the proposed alternative may be applied to require a surface examination (magnetic particle or liquid penetrant) of socket welds in Class 1 and 2, nominal pipe size 2 and smaller piping. If this is not the case, the NRC requests that the applicant modify its alternative to require a surface examination of all completed ASME Code Class 1 and 2 socket weld overlays performed in accordance with the proposed alternative and provide the applicable acceptance criteria.

**John Klos**

**DORL Callaway, Columbia Project Manager**

**U.S. NRC, Office of Nuclear Reactor Regulation,**

**Division of Operating Reactor Licensing, O8E7**

**NRC/NRR/DORL/LPL4-1, MS O8H4A**

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**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 3004

**Mail Envelope Properties** (230806b4796146f088af3680fb885e02)

**Subject:** Request for Additional Information, Columbia N-666-1, Relief Request 4ISI-06,  
Use of Code Case N-666-1 on Socket Welded Connections CAC MF7368  
**Sent Date:** 8/23/2016 7:14:37 AM  
**Received Date:** 8/23/2016 7:14:38 AM  
**From:** Klos, John

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**Post Office:** HQPWMSMRS05.nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	4079	8/23/2016 7:14:38 AM

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**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**