

NRR-PMDAPem Resource

From: Pickett, Douglas
Sent: Monday, November 07, 2016 4:25 PM
To: Prussman, Stephen G (SPrusm@entergy.com)
Cc: Alley, David; Tsao, John; Cumblidge, Stephen; Dipaolo, Eugene; Haagensen, Brian; Newman, Garrett; Rich, Sarah
Subject: Verbal Authorization for Indian Point 3 IP3-ISI-RR-10
Attachments: Indian Point Verbal Authorization IP3-ISI-RR-10.docx

Mr. Prussman:

In accordance with NRR Office Instruction LIC-102, "Relief Request Reviews," the NRR staff has provided verbal authorization for Indian Point Unit 3 relief request IP3-ISI-RR-10 as described in your letter to the NRC dated November 7, 2016.

The script read this afternoon that provides verbal authorization is attached. The staff intends to follow-up this verbal authorization with a written safety evaluation within approximately 150 days.

Please let me know if you have any questions. A copy of this email and attached verbal authorization will become publicly available in ADAMS.

Douglas V. Pickett, Senior Project Manager
Indian Point Nuclear Generating Unit Nos. 2 & 3
Douglas.Pickett@nrc.gov
301-415-1364

Hearing Identifier: NRR_PMDA
Email Number: 3150

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Subject: Verbal Authorization for Indian Point 3 IP3-ISI-RR-10
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From: Pickett, Douglas

Created By: Douglas.Pickett@nrc.gov

Recipients:

"Alley, David" <David.Alley@nrc.gov>
Tracking Status: None
"Tsao, John" <John.Tsao@nrc.gov>
Tracking Status: None
"Cumblidge, Stephen" <Stephen.Cumblidge@nrc.gov>
Tracking Status: None
"Dipaolo, Eugene" <Eugene.DiPaolo@nrc.gov>
Tracking Status: None
"Haagensen, Brian" <Brian.Haagensen@nrc.gov>
Tracking Status: None
"Newman, Garrett" <Garrett.Newman@nrc.gov>
Tracking Status: None
"Rich, Sarah" <Sarah.Rich@nrc.gov>
Tracking Status: None
"Prussman, Stephen G (SPrusm@entergy.com)" <SPrusm@entergy.com>
Tracking Status: None

Post Office:

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MESSAGE	782	11/7/2016 4:24:00 PM
Indian Point Verbal Authorization IP3-ISI-RR-10.docx		23971

Options

Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
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VERBAL AUTHORIZATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
FOR RELIEF REQUEST IP3-ISI-RR-10
ALTERNATE REPAIR OF SERVICE WATER SYSTEM PIPING
INDIAN POINT UNIT NUMBER 3
ENTERGY NUCLEAR OPERATIONS INC
DOCKET NUMBER 50-286

Technical Evaluation read by David Alley, Chief of the Component Performance, Non-Destructive Examination, and Testing Branch, Office of Nuclear Reactor Regulation

By letter dated November 7, 2016, Entergy Nuclear Operations Inc. (the licensee) submitted Relief Request IP3-ISI-RR-10 for the alternate repair of a leaking 3-inch return piping of service water system associated with Number 31 fan cooling unit at Indian Point Unit Number 3. The licensee submitted this request in accordance with the requirements of 10 CFR 50.55a(z)(2) on the basis that compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

The licensee proposed to use American Society of Mechanical Engineers (ASME) Code Case N-513-3, meeting all the requirements of the Code Case and the Regulatory Guide 1.147 condition on the Code Case except for the requirement to inspect the full pipe circumference at the flaw location. As an alternative, the licensee proposed to inspect only the accessible locations on the pipe circumference.

The NRC staff finds that (1) the licensee has demonstrated, by analysis, that the existing flaw size will not likely exceed the allowable flaw size during the effective period of the proposed relief request, (2) the licensee will periodically examine the degraded area of the affected pipe in accordance with Code Case N-513-3, (3) the licensee has performed the extent of condition inspections, (4) the licensee will follow the technical specification service water system leakage limits beyond which the licensee is required to take corrective actions, and (5) the licensee's hardship justification is acceptable because performing an ASME Code repair would elevate the plant risk without increasing the plant safety.

The NRC staff determined that the licensee's flaw evaluation has demonstrated the structural integrity of the subject piping and that the existing flaw will not likely grow to exceed the allowable flaw size within the effective period of the relief request.

Authorization read by Douglas Pickett, Acting Chief of the Plant Licensing Branch I-1, Office of Nuclear Reactor Regulation

As Acting Chief of the Plant Licensing Branch I-1, Office of Nuclear Reactor Regulation, I concur with the Component Performance, Non-Destructive Examination, and Testing Branch's determinations.

The NRC staff concludes that the proposed alternative provides reasonable assurance of structural integrity of the subject piping and that complying with the ASME Code requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. Accordingly, the NRC staff concludes that the

licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(z)(2). Therefore, as of November 7, 2016, the NRC staff authorizes the use of Relief Request IP3-ISI-RR-10 for the remainder of the fourth ten year interval until the 3R19 refueling outage, which is scheduled for March 2017, or the flaw size exceeds the acceptance criteria at Indian Point Unit No. 3.

All other requirements of ASME Code, Section XI, for which relief was not specifically requested and authorized by the NRC staff, remain applicable, including the third party review by the Authorized Nuclear In-service Inspector.

This verbal authorization does not preclude the NRC staff from asking additional clarification questions regarding Relief Request IP3-ISI-RR-10, while preparing the subsequent written safety evaluation.