

NRR-PMDAPem Resource

From: Wiebe, Joel
Sent: Tuesday, February 21, 2017 12:49 PM
To: 'Jessica Krejcie'
Subject: Request for Additional Information (RAI) Regarding Relief Request I4R-10

By letter dated August 16, 2016, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16229A250), Exelon Generation Company, LLC (the licensee) requested the U.S. Nuclear Regulatory Commission (NRC) to authorize an alternative to the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) regarding the repair of reactor vessel head penetrations (VHPs) at Byron Station Units 1 and 2 (Byron) for the fourth 10-year ISI interval. The licensee's request also included inservice inspection (ISI) examination requirements for future VHP repairs as well as previously repaired VHPs.

As discussed in a clarification call on February 21, 2017, the NRC staff needs additional information to completed its review.

1. In its February 13, 2017 letter, the licensee stated, in part, " the normal operating pressure was utilized instead of the design pressure ..."

The NRC staff was not able to identify this change in WCAP-16401-P Revision 1 as this level of detail is not provided. Provide a discussion on the change in the pressure used in the analysis and describe the impact that this change had on the conclusions in the revision of WCAP-16401-P. Also, explain why the change in the pressure used in the analysis is appropriate and discuss how this change impacts the allowable flaw size as it relates to flaw growth as shown in Figure 3-3.

2. WCAP-16401-P Revision 1 states " Engineering evaluations were performed and the results are presented in this report to provide the maximum flaw sizes that would satisfy the requirements in Section IX of the ASME Code [2004 Edition]."

Verify that all of the analyses, documented in WCAP-16401-P Revision 1, meet the ASME Code Section XI, 2007 Edition with the 2008 Addenda which is the applicable Code Edition and Addenda for the fourth ISI interval at Byron Units 1 and 2.

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