NRR-PMDAPEm Resource

From: Mahoney, Michael
Sent: Friday, April 28, 2017 10:13 AM
To: PT Vu
Cc: Jeff Thomas (Jeff.Thomas@duke-energy.com)
Subject: Request for Additional Information - McGuire Nuclear Station, Units 1 and 2 - IRLT (CACs MF9020 and MF9021)

PT,

By letter dated December 19, 2016 (Agencywide Documents Access Management System (ADAMS) Accession No. ML16363A349), Duke Energy, (the licensee), requested changes to the Technical Specifications (TSs) for McGuire Nuclear Station (MNS), Units 1 and 2. The proposed change would permit the existing Containment 10 CFR 50 Appendix J Type A Integrated Leakage Rate Test (ILRT) intervals to be extended from 10 years to 15 years and the Type C test (LLRT) intervals for qualifying containment isolation valves (CIVs) to be extended from 60 months up to 75 months on a permanent basis.

In order to complete its review, the U.S. Nuclear Regulatory Commission staff requests the following additional information. Please provide your response to the following request for additional information within 30 days of the date of this correspondence.

RAI-1

The NRC staff notes that the licensee adopted Option B of 10 CFR 50, Appendix J following the September 4, 2002 issuance of Amendment No. 207 to Facility Operating License No. NPF-9 and Amendment No. 188 to Facility Operating License NPF-17 for MNS, Units 1 and 2.

Per the guidance of Nuclear Energy Institute (NEI) 94-01, “Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J,” Revision 0 (Reference 2), Section 10.2.3.2 and subject to the four provisions identified in Regulatory Position “C” of Regulatory Guide (RG) 1.163, “Performance-Based Containment Leak-Test Program,” both MNS, Unit 1 and Unit 2 are currently allowed to extend the test intervals for Type C CIVs up to 60 months.

RG 1.63 Regulatory Position C.2 reads, in part:

> ….. Further, the interval for Type C tests for main steam and feedwater isolation valves in BWRs, and containment purge and vent valves in PWRs and BWRs, should be limited to 30 months as specified in Section 3.3.4 of ANSI/ANS-56.8-1994, with consideration given to operating experience and safety significance.

Section 10.2.3.2 of NEI 94-01 of both Revision 0 and Revision 3-A (Reference 3) reads, in part:

> Test intervals for Type C valves may be increased based upon completion of two consecutive periodic As-found Type C tests where the result of each test is within a licensee's allowable administrative limits…..

As conveyed in LAR Section 3.3 “Containment Leakage Rate Testing Program, Type B and Type C Testing,” the NRC staff notes that currently less than half of the population of both Unit’s CIVs are on extended frequencies of 60 months. The NRC staff’s review of LAR Table 3.3-3 “MNS Type Band C LLRT Program Implementation Review As-Found Failures of Components on Extended Intervals *(emphasis added)*” fails to adequately explain “Why a greater percentage of the CIVs are not qualifying for extended frequencies”?

The NRC staff requests that the licensee provide additional information about LAR Section 3.3 and Table 3.3-3. In particular, about:

A. All (i.e. not just those on extended frequencies) CIVs that failed “Administrative Limits” during the last two MNS, Unit 1 and Unit 2 refueling outages.

B. Whether there have been repetitive failures of “Administrative Limits” for any LLRTs associated with the MNS, Unit 1 or Unit 2 Type C tests (i.e. CIVs) since the last ILRTs of 2008. If so, please provide a minimum of three examples that details the corrective actions performed to prevent reoccurrence. The examples presented should be with respect to the worst performing CIVs.

C. Of the total number of 86 Unit 1 Type C penetration tests, how many are not eligible for an extended frequency of 60 months per the requirements of RG 1.163 Regulatory Position C.2 and NEI 94-01, Revision 0?

D. Of the total number of 88 Unit 2 Type C penetration tests, how many are not eligible for an extended frequency of 60 months per the requirements of RG 1.163 Regulatory Position C.2 and NEI 94-01, Revision 0?

Once this email is added to ADAMS, I will provide the accession number for your reference.

Thanks
Mike

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