

Vogle PEmails

From: Hoellman, Jordan
Sent: Wednesday, July 19, 2017 1:02 PM
To: Vogle PEmails
Subject: SNC response to NRC question on ICN for ITAAC Index No. 89
Attachments: SNC response to NRC question on ICN 89.docx

Attached is SNC's response to the NRC's comment on ICN 89 (reactor vessel head visual inspection). The previously submitted UIN included testing information that is not required to meet ITAAC 89.

Any follow-up technical discussions on this ICN will be discussed in the public meeting on Aug 3, 2017.

Hearing Identifier: Vogtle_COL_Docs_Public
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Subject: SNC response to NRC question on ICN for ITAAC Index No. 89
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SNC Vogtle 3 & 4 responses to NRC comment on ICN 89
July 19, 2017

NRC comment on ICN 89:

Please explain why there is such a significant change between what was put forth in the earlier versions of the UIN and what is now specified in the ICN. The previously submitted UINs' IDB included visual inspections of the entire head plus ultrasonic and eddy current examinations of the ID surface of each UNS N06690 penetration nozzle, as well as eddy current and liquid penetrant examination of the surface of the head penetration nozzle partial penetration welds. These inspections/examinations appeared to be consistent with the Code Case, Tier 2 section 5.3.4.7 and 50.55(a)(g)(6)(ii)(D). The preservice examinations required in Table 1 of Code Case N-729-1 approved March 28, 2006 include B.4.30 and B.4.40. We recognize that B4.10 was an improper reference. The scope of the ITAAC also affects the applicable AC from the code case i.e. 3142.1

SNC response:

The UIN ITAAC Determination Basis for ITAAC# 89 states that the following preservice examinations are performed in accordance with Section 2200 Table 1 of ASME Code Case N-729-1, as modified by the conditions specified in 10CFR50.55a(g)(6)(ii)(D):

- a baseline top-of-the-head visual examination including 360 degrees around each reactor vessel head penetration nozzle;
- ultrasonic and eddy current examination of the inside diameter surface of each vessel head UNS N06990 penetration nozzle;
- and eddy current and liquid penetrant examinations of the surface of head penetration nozzle partial penetration welds.

ITAAC# 89 Acceptance Criteria (AC) states "A report exists that documents the results of the top-of-the head visual inspection, including 360 degrees around each reactor vessel head penetration nozzle." The baseline top-of-the-head visual examination including 360 degrees around each reactor vessel head penetration nozzle performed in accordance with Code Case N-729-1, is the only examination required to meet the AC of ITAAC# 89.

The ultrasonic, eddy current, and liquid penetrant examinations are not applicable to ITAAC# 89, because these examinations are performed on the inside diameter surface of the reactor head (bottom-of-the-head). These additional examinations will be performed in accordance with Code Case N-729-1 and the Preservice Inspection (PSI) plan at a later date.