

NRR-DMPSPeM Resource

From: Venkataraman, Booma
Sent: Wednesday, November 29, 2017 4:02 PM
To: Loomis, Thomas R:(GenCo-Nuc)
Cc: Williams, Christian D:(GenCo-Nuc); Danna, James
Subject: FitzPatrick - Request for Additional Information - Relief Request 15R-02 Regarding the Use of BWRVIP Guidelines instead of ASME Code (CAC: MG0116; EPID: L-2017-LLR-0083)
Attachments: REQUEST FOR ADDITIONAL INFORMATION.docx
Expires: Sunday, January 28, 2018 12:00 AM

Mr. Loomis,

By application dated August 10, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17223A280), Exelon Generation Company (Exelon, the licensee) submitted a proposed alternative, Relief Request No. I5R-02, for the James A. FitzPatrick Nuclear Power Plant (FitzPatrick) in accordance with 10 CFR 50.55a(z)(1). This request proposes to use various Boiling Water Reactor Vessel and Internals Project (BWRVIP) guidelines as an alternative to certain requirements of Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) for inservice inspection of reactor vessel internal components.

A draft request for information (RAI) was sent to you on November 16, 2017. A clarification call was held on November 29, 2017. The final RAI version after the clarification is attached to this e-mail. It was agreed that Exelon will respond to the attached RAI with a supplement by December 29, 2017.

Please treat this e-mail as transmittal of formal RAIs. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-2934 or via email at Booma.Venkataraman@nrc.gov.

Sincerely, Booma

Booma Venkataraman, P.E.

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Regarding the Use of BWRVIP Guidelines instead of ASME Code (CAC: MG0116; EPID:
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From: Venkataraman, Booma

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"Williams, Christian D:(GenCo-Nuc)" <Christian.Williams@exeloncorp.com>

Tracking Status: None

"Danna, James" <James.Danna@nrc.gov>

Tracking Status: None

"Loomis, Thomas R:(GenCo-Nuc)" <thomas.loomis@exeloncorp.com>

Tracking Status: None

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REQUEST FOR ADDITIONAL INFORMATION

REQUEST FOR ALTERNATIVE TO USE BWRVIP GUIDELINES

RELIEF REQUEST I5R-02

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-333

By application dated August 10, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17223A280), Exelon Generation Company, (the licensee) submitted Request for Alternative I5R-02 for its James A. FitzPatrick Nuclear Power Plant (JAFNPP). I5R-02 proposes to use various Boiling Water Reactor (BWR) Vessel and Internals Project (BWRVIP) guidelines as an alternative to certain requirements of Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) for inservice inspection (ISI) of reactor vessel internal (RVI) components.

The U. S. Nuclear Regulatory Commission (NRC) staff is reviewing the submittal and has determined that the additional information below is needed to complete its review.

RAI-1

Section 3.0.3.2.7, "BWR Vessel Internal Programs" of the safety evaluation for license renewal of JAFNPP, "Safety Evaluation Report Related to the License Renewal of James A. FitzPatrick Nuclear Power Plant" (ADAMS Accession No. ML080250372) indicated that, "The staff determined that the current basis for inspecting the core plate rim hold-down bolts at JAFNPP relies solely on inspections performed in accordance with ASME Code Section XI, Table IWB-2500-1, B-N-1 requirements...The staff concluded that the current basis for examining the core plate would not be sufficient to manage either stress relaxation or cracking of the core plate rim hold-down bolts during the period of extended operation [(PEO)]." This section also states that JAFNPP committed to take the following actions:

1. Install core plate wedges prior to the PEO, or,
2. Complete a plant-specific analysis to determine acceptance criteria for continued inspection of the core plate rim hold down bolting in accordance with BWRVIP-25, "BWRVIP Core Plate Inspection and Flaw Evaluation Guidelines" and submit the inspection plan, along with the acceptance criteria and justification for the inspection plan, to the NRC two years prior to the PEO for NRC review and approval.

In light of the above, either BWRVIP-25 should be included in Table 1 as one of the applicable BWRVIP documents for Item B13.40 (Integrally Welded Core Support Structure) or provide justification provided for excluding it. Please note that BWRVIP-25 is the basis for not performing the ASME Code, Section XI, VT-3 examination on accessible surfaces of the core plate.

RAI-2

Enclosure 2 to I5R-02 is the reactor internals inspection history updated for refueling outage 22 (January 2017). The NRC staff reviewed this history and found that Enclosure 2 does not include inspection history for Item B13.10, Reactor Vessel Interior. Please clarify whether the absence of inspection results for Item B13.10 in Enclosure 2 means that no relevant indications were noted for this item in all past examinations.

RAI-3

The NRC staff noted that BWRVIP-139, "BWR Vessel Internals Project, Steam Dryer Inspection and Flaw Evaluation Guidelines" is not listed in Section 5 of I5R-02 as one of the guidance BWRVIP reports. Provide justification why BWRVIP-139 is not needed for either Steam Dryer Hold-down Brackets or Steam Dryer Support Brackets listed in Table 1 under Item B13.30.