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Date: 10/7/98 5:24pm
Subject: Telecon notes

Attached are the notes from our telecon last week on the RCIC TIA response. I'm sorry to be so late with this. I tried to get it done Monday before I left for Washington but ran out of time. I had trouble getting a connection back to my e-mail when I got here but now it seems to be working.

<<RCICNRC.doc>>

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RCIC STEAM TRAP TELECON NOTES
October 1, 1998

- I. Staff Response to TIA 97-026, dated August 24, 1998
- Concluded that TVA did not meet requirements of Technical Specification 3.6.G.1.b
 - TVA Concerns
 - 1) Staff interpretation is contrary to intent of ASME code
 - 2) As applied would require placing plant in less safe (higher risk) condition needlessly

II. TIA QUESTIONS

1. Questions TVA's position that TS 3.6.G.1.b is not applicable at power.
 - TIA Response - 3.6.G.1 states that the "structural integrity of class 1, 2, 3, shall be maintained throughout life of the plant," therefore applicable at any power level.

TVA COMMENTS

-TS 3.6.G.1 actually says "The structural integrity of ASME Code Class 1, 2, and 3 equivalent components shall be maintained IN ACCORDANCE WITH SPECIFICATION 4.6.G throughout the life of the plant." (Emphasis Added)

-TS 4.6 G, states "Inservice inspection of ASME Code Class 1, Class 2, and Class 3 components shall be performed in accordance with Section XI of ASME Boiler and Pressure Vessel Code..."

ASME Section XI requires initial and periodic inspections and tests, and prescribes actions for repair and replacement activities.

Therefore, the actions prescribed by TS 3.6.G.1 apply to defects identified by the Section XI



program. Since ISI is typically done at shutdown conditions (when TS's don't apply) the specific action statements apply to the conditions that exist during ISI activities. (See 3.6.G.1.a, which requires maintaining the RCS in a cold shutdown condition)

Note: 3.6.G.1 LCO's would apply at power if either ISI was being performed as part of scheduled ISI or if it was being done as the result of repair or replacement.

History of BFN TS 3.6.G

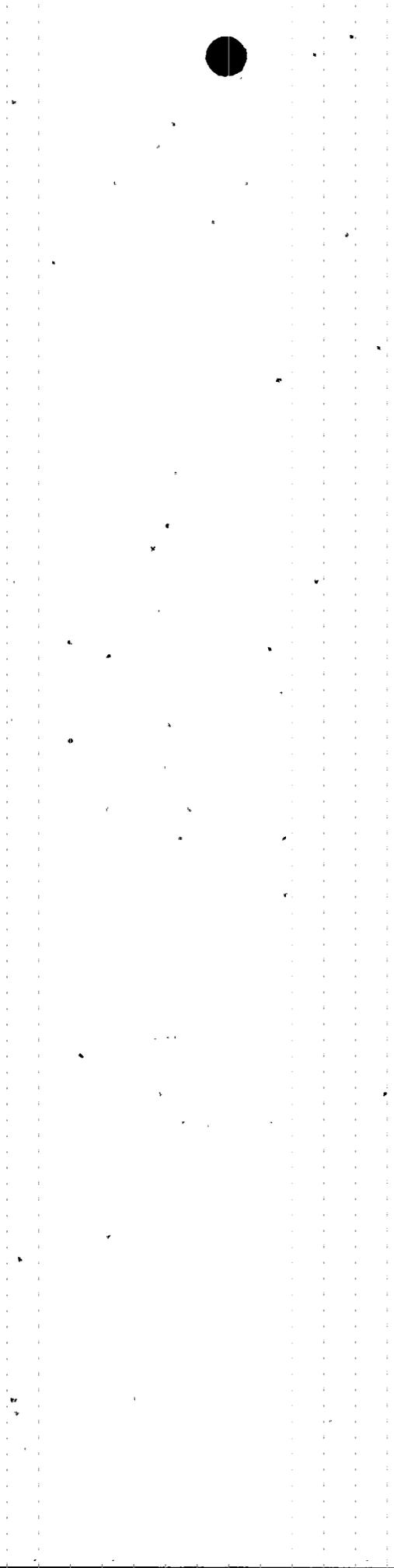
4/30/84 - NRC approved amendments (98, 92, 65) to incorporate 50.55(a), LCO was specified only for RCPB. NRC requested " ..review your TS for any defects which might be identified in the course of inspection for the balance of ASME Code Class 1,2, and 3 Systems." (Emphasis Added) It also referenced BWR STD TS (NUREG 0123) for staff guidance.

NUREG 0123 (Section 3.4.8.b) states, for class 2 failures, "... restore the structural integrity of the affected component(s) to within its limit or isolate the affected component(s) prior to increasing the reactor coolant system temperature above 212° F."

This clearly implies that this would only apply during shutdown conditions. Also, the 4/30/84 NRC letter clearly requested TVA to change the TS to address defects in the balance of ASME Code Class 1, 2, and 3 systems "identified in the course of inspection."

2/24/86 - TVA submitted TS 218 in response to the NRC 4/30/84 request.

-TS 218 did not differentiate Class 2 and 3 component LCO's (as stated in NUREG 0123), but



rather applied the less restrictive LCO for Class 3 to both Class 2 & 3 components.

12/4/86 - NRC approved TS 218 (Amendments 131, 127, 102) without comments or details in the SER.

CONCLUSION

- BFN TS 3.6.G.1 requires an ISI program in accordance with ASME Section XI. The specified LCO's apply only during inspections or tests performed under the ISI program.

This is confirmed by:

-Wording of LCO 3.6.G.1 which directs structural integrity to be maintained by compliance with Section XI.

-NRC letter 4/30/84 and history of TS 3.6.G, and NUREG O123.

-Section XI paragraph IWA-5250 CORRECTIVE MEASURES, "The leakages detected during the conduct of a system pressure test shall be located and evaluated by the owner for corrective measures ..."

-Further confirmed by ASME Code committee interpretations:

XI-1-92-03 (September 10, 1991)

XI-1-92-19 (March 10, 1992)

Based on the history of this TS and previous ASME Code Committee interpretations, this staff interpretation appears to be a backfit pursuant to 10 CFR 50.109 as stipulated in GL 91-18.

2. If TS 3.6.G.1.b is applicable, did licensee's action meet all of the requirements of the TS?

- TIA Response
- Did not meet TS requirements



◆TS requires component be declared inoperable when the structural integrity cannot be restored within it's limits, this was the case for two days.

◆Section 6.15 of Inspection Manual 9900 says declare component inoperable

◆Interprets "upon discovery" from Inspection Manual 9900 to mean immediately.

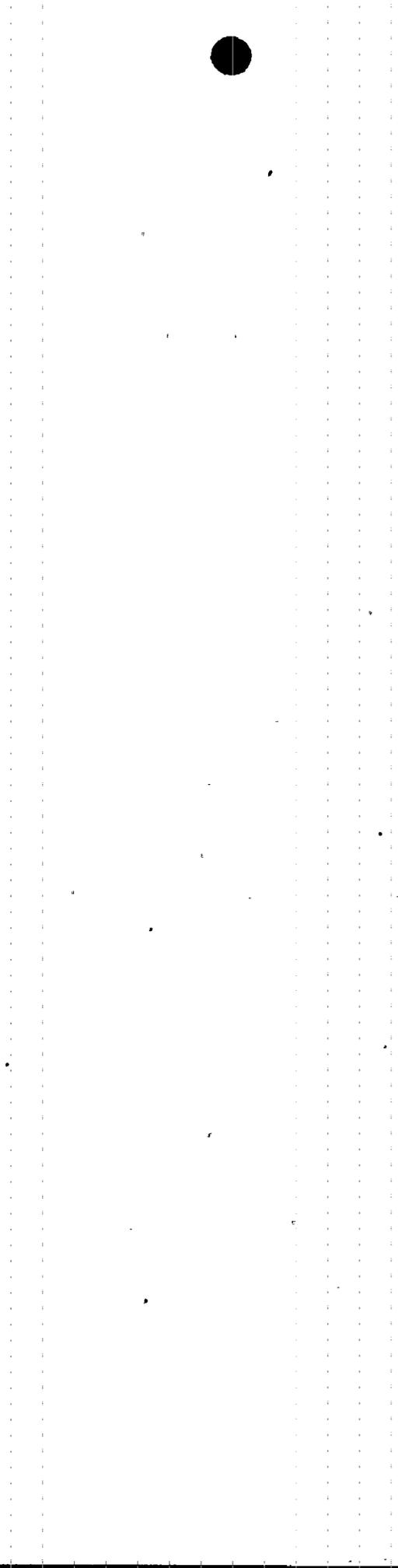
TVA COMMENTS

As previously stated, TS 3.6.G.1.b does not apply since the RCIC steam trap leak was not discovered as part of ISI. Consistent with ASME Code Committee interpretations, TS's apply for RCIC system operability at power. The effect of the leaking steam trap (inoperable component) was promptly evaluated. The evaluation concluded that structural integrity of RCIC was not affected by the leaking steam trap. As a result, RCIC was operable, structural integrity of RCIC was maintained, and no isolation was required or LCO was entered keeping RCIC available. Repairs were being pursued and were completed in a reasonable time as stated in IR 97-10. Therefore, TS operability of RCIC was maintained and no TS violation occurred.

Note: Even if 3.6.G.1 is considered to apply:

- TS 3.6.G.1.b says "...restore the structural integrity of the affected component to within its limits OR isolate the component." (Emphasis added)
- TS does NOT specify a time limit.
- TVA elected to restore structural integrity of the steam trap.
- Actions were initiated and carried out expeditiously.

The TIA response concluded that the action should be taken immediately. The TIA response *interprets* the Inspection Manual to devise a time limit for BFN TS. It concluded that the actions should be taken immediately. This appears inappropriate. As shown previously, the



BFN TS were based on NUREG 0123 which did not specify a time limit and further assumed inspection would be conducted during shutdowns.

Further, if this interpretation is accurate, the "restore structural integrity" option is never available and has no meaning since restoring structural integrity cannot be done "immediately."

Also, if the Staff interpretation is correct, whenever inspections are being performed on Class 2 or Class 3 components in outages, the only option would be to "immediately" isolate the component. This is not what was intended by Section XI nor the BFN TS.

3. Did licensee actions meet expectation of Inspection Manual 9900 regarding actions taken if leak is discovered in Class 1, 2, or 3 component.

-TIA response - TVA should have declared RCIC inoperable based on Inspection Manual 9900.

TVA COMMENTS

Inspection Manual 9900 states, "upon discovery of leakage from a Class 1, 2, or 3 component pressure boundary (i.e., pipe wall, valve body, pump casing, etc.) the licensee should declare the component inoperable upon discovery..." As discussed above, this was done (i.e., the steam trap was considered inoperable). Evaluation of the effect of the leaking steam trap to RCIC concluded that RCIC was not affected.

The TIA response translates the Manual statement "component" to RCIC "System".

Is this what is intended (i.e., that any leak makes a system inoperable)?

If so, does this apply to any leak (i.e., flange connection, seal, gasket, etc.)?



4. While ASME Code Interpretations are clearly not part of the code, licensees utilize the information presented in the interpretations. It appears that there is a conflict between several interpretations and the Inspection Manual guidance. Is it appropriate for these apparent disparities to be addressed and if so, have they been?

TIA RESPONSE

- Code interpretation conflicts w/guidance in Section 6.15 of Manual Chapter 9900.
- Conflicts between code interpretations and NRC requirements are addressed in Technical Guidance of Part 9900 and in the proposed change to 10CFR.50.55a
- NRC not bound to code interpretations since they are not incorporated into CFR.

TVA COMMENTS

TG OF 9900 STATES "...Regulations transcend the code..", and "... If an official Code interpretation is identified by an inspector that appears to either conflict with or be inconsistent with NRC requirements (such as the regulations), a license condition, a technical specification, an NRC order.."

The response to the question above identifies a conflict between the official Code interpretation and Inspection Manual 9900.

The Staff appears to be taking the position that Inspection Manual 9900 is a regulation or NRC requirement.

If 9900 is not a regulation or NRC requirement, then nothing has been shown where the Code interpretation is in conflict with NRC Requirements.

