

PUBLIC SUBMISSION

As of: 5/9/18 8:11 AM
Received: May 08, 2018
Status: Pending Post
Tracking No. 1k2-9318-uvis
Comments Due: May 08, 2018
Submission Type: Web

Docket: NRC-2018-0038

Clarification of the Requirements for Reactor Pressure Vessel Upper Head Bare Metal Visual Examinations

Comment On: NRC-2018-0038-0001

Clarification of the Requirements for Reactor Pressure Vessel Upper Head Bare Metal Visual Examinations;
Draft Regulatory Issue

Document: NRC-2018-0038-DRAFT-0003

Comment on FR Doc # 2018-04350

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General Comment

See attached file(s)

Attachments

Draft RIS 2018-XX (GAW comments)

SUNSI Review Complete

Template = ADM-013

E-RIDS=ADM-03

ADD= Tanya Mensah

COMMENT #2

PUBLICATION DATE: 3/9/2018

CITATION # 83 FR 10407

Some of the wording under "Summary of Issue" is imprecise and may unnecessarily lead to confusion regarding what is actually intended. My specific comments for rectifying the wording are as follows:

1. The first sentence in the second paragraph under "Summary of Issue" as written implies that "relevant conditions" at or near a nozzle annulus necessarily must be concluded to trigger supplemental examination per 3142.2 or nozzle repair per 3142.3(b). Instead, as stated in the first sentence of the next paragraph, 3142.1(b)(1) requires further evaluation to determine the source of the leakage. I suggest clarifying the first sentence in the second paragraph under "Summary of Issue" as follows:

*Consistent with the definition of "relevant conditions," areas of corrosion, boric acid deposits, or discoloration at or near a nozzle annulus in all cases, and irrespective of the material from which the affected components are fabricated, are **potentially** "relevant conditions indicative of possible nozzle leakage" according to ASME Code Case N-729-4, Subsections 3142.1(b) and (c).*

2. The final sentence (beginning "If the source of relevant condition of possible nozzle leakage cannot be determined...") in the third paragraph under "Summary of Issue" is unclear as written and may lead to unnecessary confusion. For example, the sentence confuses "relevant conditions indicative of possible nozzle leakage" with "relevant conditions" as defined in 3140 of the code case. The purpose of the further evaluation of the source of the leakage is to determine whether there are "relevant conditions indicative of possible nozzle leakage." In addition, the sentence should specifically cite 3142.3(b) as 3142.3(a) is applicable only if the further evaluation shows "relevant conditions *not* indicative of possible nozzle leakage." I suggest clarifying the final sentence in the third paragraph under "Summary of Issue" as follows (with suggested deletions shown using strikethroughs):

*If the source of ~~relevant condition of possible nozzle~~ leakage cannot be determined by examining the as-found condition of the relevant conditions (e.g., by assessment of boron deposit tenacity using light cleaning methods or by boron deposit chemical analysis), ~~either because the boric acid deposits were tightly adhered to the surface, or because evidence of the relevant condition was removed by aggressive cleaning methods,~~ the requirements of ASME Code Case N-729-4, Subsection 3142.2 or Subsection 3142.3(b) must be met. **Tightly adherent boron deposits not removed using light cleaning methods are evidence that the deposits formed during plant operation. Removal of deposits using aggressive cleaning methods without first examining the as-found condition precludes a meaningful further evaluation of the source of the leakage.***