

NRR-DMPSPeM Resource

From: Williams, Shawn
Sent: Wednesday, May 16, 2018 8:14 AM
To: Coleman, Jamie Marquess
Cc: Jackson, Nicole D.
Subject: Edwin I. Hatch, Unit 1 and 2 – Acceptance of Proposed Alternative HNP-ISI-ALT-05-07, Version 1.0, Service Water Evaluation for Code Case N-513-4 for Higher Pressure (EPID No. L-2018-LLR-0070)

Dear Mrs. Coleman,

By letter dated April 6, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18096B554), the Southern Nuclear Operating Company, Inc., (SNC) submitted a relief request (HNP-ISI-ALT-05-07, Version 1.0) for Edwin I. Hatch Nuclear Plant, Unit 1 and 2.

SNC's relief request proposes an alternative from the requirement to perform repair/replacement activities for degraded Class 2 and 3 piping whose maximum operating temperature does not exceed 200°F and whose maximum operating pressure does not exceed 450 psig. Specifically, this applies to the Residual Heat Removal Service Water (RHRSW) system. SNC is requesting approval to apply the evaluation methods of ASME Code Case N-513-4, "Evaluation Criteria for Temporary Acceptance of Flaws in Moderate Energy Class 2 or 3 Piping Section XI, Division 1," to Class 2 and 3 components that meet the operational and configuration limitations of Code Case N-513-4, paragraphs 1 (a), 1 (b), and 1 (d) in order to avoid accruing additional personnel radiation exposure and increased plant risk associated with a plant shutdown to comply with the Code requirements.

The licensee submitted the relief request pursuant to Section 50.55a(z)(2) of Title 10 of the *Code of Federal Regulations* (10CFR), which requires the applicant to demonstrate that the proposed alternative would be acceptable on the basis that complying with the specified requirement would result in hardship or unusual difficulty, without compensating increase in the level of quality and safety.

The purpose of this letter is to provide the results of NRC staff's acceptance review. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed alternative in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this relief request will take approximately 100 hours to complete. The NRC staff expects to complete this review by March 2019. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

Shawn Williams
NRR/DORL/LPL2-1
V.C. Summer and Farley PM
301-415-1009

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From: Williams, Shawn

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Recipients:

"Jackson, Nicole D." <NDJACKSO@southernco.com>

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