ML 18225A093

V.C. Summer Nuclear Station Unit 1
Baseline In-Service Inspection
Initial Information Request

V. C. SUMMER NUCLEAR STATION – UNIT - 1 – NOTIFICATION OF INSPECTION AND REQUEST FOR INFORMATION

During the week of October 15 – October 19, 2018, the Nuclear Regulatory Commission (NRC) will perform the baseline in-service inspection at the V. C. Summer Nuclear Station Unit-1, in accordance with NRC inspection procedure IP 71111.08, "Inservice Inspection Activities." Experience has shown that this inspection is resource intensive for both the NRC inspectors and your staff. In order to minimize the impact to your onsite resources and to ensure a productive inspection, we have enclosed a request for information. Section A of the enclosure identifies information to be provided prior to the inspection to ensure adequate sample selection and preparation. Section B of the enclosure identifies additional information the inspectors will need upon arrival at the site to complete the review of inspection samples. The inspection staff would appreciate if all the documents requested are up to date and complete in order to minimize the number of additional documents requested during the preparation and/or the onsite portions of the inspection.

We have discussed the schedule for this inspection activity with your staff and understand that our regulatory contact for this inspection will be Mr. Bruce Bennett, of your organization. Our inspection dates are subject to change based on your updated schedule of outage activities. If there are any questions about this inspection, changes to the schedule of activities, or the material requested, please contact the lead inspector, Alexander Butcavage, at (404) 997-4640 or Alexander.Butcavage@nrc.gov. Note that due to the number of Inservice inspections occurring at other Licensee facilities during the fall of 2018, the lead inspector scheduled to perform this inspection at your facility may need to be changed. In that case, the new lead inspector will notify you as soon as possible in order to facilitate a smooth transition.

In accordance with Title 10 of the Code of Federal Regulations 2.390, "Public Inspections, Exemptions, Requests for Withholding," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS); accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

PAPERWORK REDUCTION ACT STATEMENT

This document does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget under control numbers 3150-0008, 3150-0011, 3150-0014, 3150-0044, and 3150-0135.

PUBLIC PROTECTION NOTIFICATION

The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement, unless the requesting document displays a currently valid Office of Management and Budget control number.

Document Request List

Licensee:	V. C. Summer Nuclear Station, Unit 1
Docket No.:	50-395
Inspection Dates:	October 15 – October 19, 2018
Entrance Meeting:	October 15, 2018
Inspection Procedure:	IP 71111.08, "Inservice Inspection Activities," Dated December 22, 2016
Inspector(s):	Alexander Butcavage, Reactor Inspector, Lead ISI Inspector Robert Carrion, Senior Reactor Inspector, Lead SGISI Inspector

A. Information Requested for the In-Office Preparation Week

Please provide the information requested in this section to the NRC Region II Office in care of the lead inspector by October 12, 2018, in order to facilitate the selection of specific items that will be reviewed during the onsite inspection week(s). The information can be provided in hard copy or electronic format; however, electronic format is preferred, either by digital data storage device (compact disk) or web-based document management system.

The inspector(s) will select specific samples from the information provided for items A.1 through A.5 below and then request additional documents needed for the onsite inspection week(s) as described in Section B of this enclosure. The specific documents selected for Section B should be available and ready for review on the first day of inspection. If requested documents are large and only hardcopies are available, please inform the inspector(s) and provide the subject documentation during the first day of the onsite inspection. All documents requested in this section correspond to the Unit scheduled to be in a refueling outage during the onsite inspection week(s), unless an information request item explicitly states that it applies to all operating Units. Additionally, some of the information requested may not apply to the site depending on the scope of refueling outage activities or other plant-specific conditions. If there are any questions regarding this information request, please contact the lead inspector as soon as possible.

A.1 Non-destructive Examination and Welding Activities

a. A detailed schedule (including preliminary dates) of nondestructive examinations (NDEs) planned for the structures, systems, and components (SSCs) listed below as part of the Inservice Inspection Program required by the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPVC), Section XI, as incorporated by reference in 10 CFR 50.55a, and other augmented in-service inspection activities:

- ASME Code Class 1, 2, and 3 components and supports (including Risk-Informed ISI Program)
- ASME Code Class MC and metallic liners of Class CC components (e.g., reactor building containment line

- ASME Code Class CC components
- ASME Code Class MC supports
- Alloy 82/182/600 components (ASME Code Cases N-722 and N-770)
- Reactor vessel internals (e.g., Electric Power Research Institute (EPRI) MRP-227-A Program such as Baffle Former Bolt Inspections)
- Other components to be inspected through NDE in accordance with industry initiatives or requirements (e.g., NEI-03-08 Initiatives or EPRI Guidelines)

b. A detailed schedule (including preliminary dates) of welding activities to be completed on ASME Code Class 1, 2, or 3 components and supports during the upcoming refueling outage.

c. A list of NDE reports (ultrasonic, radiographic, magnetic particle, and liquid penetrant) addressing surface or volumetric indications that were analytically evaluated and accepted for continued service in ASME Code Class 1, 2, and 3 components since the beginning of the last refueling outage. This list should also include any evaluations for continuous service performed as a result of Section XI pressure test(s) conducted during start up from the last refueling outage.

d. A list of the welds in ASME Code Class 1, 2, and 3 systems that have been fabricated due to component repair/replacement activities since the beginning of the last refueling outage. Please include a brief description of the welds such as system, material, pipe size, weld number, and NDEs performed. Additionally, please indicate which of those welds are risk-significant.

e. If NDE of pressure retaining welds in the reactor vessel shell required by the ASME BPVC, Section XI, Subsection IWB (also known as “10-year Reactor Vessel ISI”) are scheduled to occur during the upcoming outage, provide a detailed description of the welds to be examined and the extent of the planned examination. Please include reference numbers for applicable procedures that will be used to conduct these examinations.

f. A copy of ASME BPVC, Section XI Relief Requests and the associated NRC Safety Evaluation Reports applicable to the NDEs scheduled for the upcoming refueling outage.

g. A list of temporary Code or temporary non-Code repairs installed in ASME Code Class components (e.g., pinhole leaks or mechanical clamping devices).

h. A copy of the most recent program self-assessments addressing the ISI Program and welding activities.

A.2 <u>Reactor Pressure Vessel Upper Head Penetration (VUHP) Inspection Activities</u>

a. A detailed schedule (including preliminary dates) of NDEs planned for the reactor pressure VUHPs to meet the requirements of ASME Code Case N-729, as incorporated by reference in 10 CFR 50.55a.

b. A detailed scope of the planned NDEs for the reactor pressure VUHPs. Please identify the types of NDE methods to be used on each specific part of the vessel upper head to meet the augmented inspection requirements of ASME Code Case N-729, as incorporated by reference in 10 CFR 50.55a.

A.3 Boric Acid Corrosion Control Program (BACCP) Inspection Activities

a. A copy of the procedures governing the implementation of the BACCP, including procedures required to identify boric acid leakage and perform boric acid leakage/corrosion evaluations.

b. A list of leaks in ASME Code Class components which have been identified since the last refueling outage, including reference to the associated corrective action program documentation. If during the last cycle, the Unit was shut down, please provide documentation of containment walk-down inspections performed as part of the BACCP.

c. Copy of the most recent self-assessment performed for the BACCP.

A.4 Steam Generator (SG) Tube Inspection Activities

a. A detailed schedule of SG tube inspection, eddy current data analyses, tube in-situ pressure testing, tube repairs, and SG secondary side inspection activities for the upcoming refueling outage.

b. A copy of the current version of the following documents:

- SG ISI Inspection Program and Plan
- Condition Monitoring Assessment
- Operational Assessment

c. A copy of the current Technical Specifications for the SG Inservice Inspection Program, including recent NRC Safety Evaluation Reports for license amendments issued since the last refueling outage (e.g. alternate repair criteria as a result of the incorporation of Technical Specification Task Force activities).

d. Confirmation of whether SG primary-to-secondary leakage was identified and quantified during the previous operating cycle. If primary-to-secondary leakage was identified, please provide documentation describing the affected SG and corrective actions completed, or planned for this condition.

NOTE: The following information request items are applicable only if eddy current examination of the SG tubes will occur during the upcoming refueling outage

e. A copy of the most recent Degradation Assessment.

f. A copy of the Eddy Current Examination Plan describing the scope of SG tube examinations, including examination methods such as bobbin, rotating, or array probes, and the percentage of tubes to be examined. Do not provide this information separately if it is already included in other documentation requested.

g. A copy of the SG plant-specific degradation history provided to the vendor performing eddy current examination of the SG tubes during the upcoming outage. Please include information on issues pertaining to the secondary side of the steam generators (including items such as loose parts, fouling, top of tube sheet condition, and crud removal amounts, etc.). Do not provide this information separately if it is already included in other documentation requested.

h. A copy of the following documents, as applicable:

- SG Eddy Current Data Analyst Guidelines
- Site Validated Eddy Current Techniques
- Eddy Current Technique Qualification Records per EPRI Appendix H or I

i. A copy of the most recent program self-assessments for SG tube integrity, loose parts monitoring, and secondary side water chemistry control.

j. The location of the primary, secondary, and resolution analysis teams.

A.5 Other Information Related to All ISI Activities

a. A list with a brief description of ISI-related issues entered into the corrective action program for all operating Units since the beginning of the last Unit 3 refueling outage, including issues related to the SG tube inspections and the BACCP. For example, provide a list of condition reports based upon database searches using keywords related to piping, vessels, and SG tube degradation such as: ISI, ASME Code, Section XI, NDE, welding, SG tube, reactor vessel, steam generator, reactor coolant system, crack, wear, thinning, leakage, thru-wall, rust, corrosion, boric acid, or errors in piping/SG tube examinations.

b. A copy of the site's response to recent NRC generic communications and other industry operating experience notifications associated with the inservice inspection and structural integrity of ASME Code Class components issued since the beginning of the last refueling outage (e.g. Generic Letters, Information Notices, etc.).

c. Names and contact information for the following program leads:

- ISI Program (examination, planning)
- Reactor Containment Building ISI Program
- Alloy 600 Program
- VUHP Inspection Program
- Snubbers and Supports Inspection Program
- Repair and Replacement Program
- Licensing
- Site Welding
- Boric Acid Corrosion Control Program
- SG Inspection Program (site lead and vendor contact)

d. Current outage and ISI program information including:
- Current edition and addendum of the ASME Code being used for inspection, NDE, welding and repair/replacement activities
- Current edition and addendum of the ASME Code being used for containment inspections
- Outage name (e.g. U2R20)
- Current ISI interval number, period within the interval, outage within the period and total number of outages overall for the interval (e.g. the first outage of the third period in the fourth interval of the ISI inspection program, and the fifth outage for the interval

B. Information Requested for the Onsite Inspection Week(s)

Please provide the information requested below in hard copy or electronic (preferred) format to the lead inspector at the entrance meeting, in order to finalize the planning of inspection activities onsite. Prior to the onsite inspection, the inspector(s) will select part of the inspection samples from the information provided in response to Section A of this enclosure, and then request additional information needed to complete the review. There is a possibility that some of the inspection samples for which direct observation is desired (e.g., planned NDEs) will not be selected until the inspector(s) arrives onsite and confirms the current schedule of refueling outage activities for that week. All documents requested in this section correspond to the Unit scheduled to be in a refueling outage during the onsite inspection week(s), unless an information request item explicitly states that it applies to all operating Units. Additionally, some of the information requested may not apply depending on the scope of refueling outage activities or other plant-specific conditions.

B.1 Non-destructive Examination Activities, Welding Activities, and Schedule Information

a. Updated schedules for the planned NDE and welding activities described in the response to items A.1.a and A.1.b of this enclosure.

b. For the NDEs selected by the inspector(s) from item A.1.a of this enclosure, please provide a copy of the NDE procedures used to perform the examinations (including calibration and flaw characterization/sizing procedures). For ultrasonic examination procedures qualified in accordance with ASME Code, Section XI, Appendix VIII, please provide documentation supporting the procedure qualification (e.g., the EPRI performance demonstration qualification summary sheets). Please include documentation of the specific equipment to be used (e.g., ultrasonic unit, cables, and transducers including serial numbers) and NDE personnel qualification records.

c. For the NDE reports with relevant indications on ASME Code Class 1, 2, and 3 components selected by the inspector(s) from item A.1.c of this enclosure, please provide a copy of the examination records, NDE qualification records, and associated corrective action documents, including technical evaluations supporting the acceptability of the indications for continuous service.

d. For the ASME Code Class 1, 2, and 3 welds selected by the inspector(s) from item A.1.d of this enclosure, please provide copies of the following documentation for each subject weld:
   - weld data sheet (traveler)
   - weld configuration and supporting drawings (e.g. ISI isometric drawings)
   - applicable ASME BPVC Edition and Addenda
   - Weld Procedure Specification (WPS) used to fabricate the welds
   - Procedure Qualification Records (PQRs) supporting the WPS
   - mechanical test reports supporting the applicable PQRs
   - welder performance qualifications records, including documentation that welder maintained proficiency in the applicable welding processes specified in the WPS
   - examination records for the NDEs performed during weld fabrication
   - preservice NDE personnel qualification records for both fabrication and preservice NDEs

- nonconformance reports for the selected welds (if applicable)

B.2 Reactor Pressure Vessel Upper Head Penetration (VUHP) Inspection Activities

a. A copy of the latest calculation of effective degradation years (EDY) and re-inspection years (RIY) for the VUHP crack initiation and propagation susceptibility parameters.

b. A copy of NDE reports from the last visual and non-visual VUHP examinations.

c. If visual and/or non-visual NDEs of the VUHPs are planned for the upcoming refueling outage, please provide the following:
   - a copy of the procedures governing the implementation of NDEs
   - drawings showing the configuration of the VUHPs within the scope of the examinations
     (e.g. upper head insulation configuration, fabrication drawings of the nozzle attachments, geometrical limitations, etc.)
   - documentation demonstrating that the scope of the NDEs will meet the minimum coverage required by ASME Code Case N-729, as modified by 10 CFR 50.55a
   - documentation demonstrating the detection capability and qualification of the NDE personnel, procedures, and equipment in accordance with 10 CFR 50.55a
   - identify any changes in equipment configurations used for the VUHPs examinations that differ from that used in the vendor qualification or demonstration report(s)

B.3 Boric Acid Corrosion Control Program Inspection Activities

a. Inspection results for boric acid walk-downs, including an updated list of boric acid leaks identified during the current refueling outage with associated corrective action documentation, and overall status of planned boric acid inspections.

b. A list of engineering evaluations completed for boric acid leaks identified since the end of the last refueling outage. Please include a status of corrective actions to repair and/or clean these boric acid leaks. Please specify which known leaks, if any, have remained in service, or will remain in service, as active leaks.

c. In accordance with NRC inspection procedure 71111.08, the inspector(s) would like to conduct an independent boric acid walk-down of the Reactor Building Containment early in the inspection week. Please have knowledgeable BACCP staff available to accompany the inspector(s) during the walk-down.

B.4 Steam Generator Tube Inspection Activities

a. An updated schedule of SG tube inspection activities, including potential in-situ pressure tests, tube repairs, and secondary side inspections.

NOTE: The following information request items are applicable only if eddy current examination of the SG tubes will occur during the upcoming refueling outage

b. A copy of the Eddy Current Examination Technique Specification Sheets (ETSS) from the EPRI Performance Demonstration Database that are applicable to the scheduled examinations of SG tubes.

c. A copy of the eddy current examination procedures governing the SG tube examination activities. Specifically, provide the procedures for calibration, flaw detection, and flaw sizing.

d. Access to the training and qualification records of personnel performing eddy current data analysis, including training material and test results for any site-specific training provided to the data analysts.

e. Access to the certification records of eddy current equipment (i.e. eddy current instruments, probes, and calibration standards).

f. A copy of the procedures to be followed if a loose part or foreign material is identified in the steam generators.

g. Documentation demonstrating that the in-situ pressure test screening criteria are in accordance with the applicable EPRI Guidelines. Please have knowledgeable staff available to discuss the analytical method used to determine the in-situ pressure test screening criteria.

h. A list of corrective action documents generated by the vendor with respect to SG tube inspection activities during the current refueling outage.

B.5 Other Information Related To All ISI Activities

a. For the ISI-related corrective action issues selected by the inspector(s) from item A.5.a of this enclosure, please provide copies of the corrective action documents and supporting documentation (e.g. cause evaluations, work orders, corrective action plan, etc.).

b. An updated list of ISI-related issues entered into the corrective action program for the current refueling outage, including issues related to the steam generator tube inspections and Boric Acid Corrosion Control Program.

c. A copy of or ready access to:
- applicable editions and sections of the ASME BPVC (e.g. Sections II, III, V, IX, and XI) for the inservice inspection and repair/replacement activities selected for review
- industry standards referenced in the procedures for the BACCP
- EPRI and other industry standards referenced in the procedures used to perform the SG tube inspection activities
- a current revision of the ISI Program Manual and Plan for the current interval

Inspector(s) Contact Information:
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Division of Reactor Safety (DRS)
Engineering Branch 3 (EB-3)
404-997-4640

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From:	Butcavage, Alexander
To:	BENNETT, BRUCE ALLEN
Cc:	Bonser, Brian; Carrion, Robert; Egelstad, Donna
Subject:	V.C. Summer Unit-1, Oct. 15-19 - In-service Inspection - Request For Information
Date:	Friday, August 10, 2018 2:08:50 PM
Attachments:	VCS ISI 2018004 RFI AJB .pdf

Mr. Bennett,

Please find attached the NRC request for information for use during the upcoming In-Service Inspection in accordance with IP 71111.08, “In-service Inspection Activities” scheduled for 15 - 19 October, 2018.

Please confirm receipt of this request by return E-mail.

Please also note that inspections at other Licensee facilities during the Fall 2018 outage season may necessitate assigned inspector changes as schedules are finalized.

Thank You in advance for your help in compiling the requested information.

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