

NRR-DMPSPEm Resource

From: Lingam, Siva
Sent: Thursday, April 4, 2019 3:44 PM
To: Matthew.Cox@aps.com
Cc: Pascarelli, Robert; Cumblidge, Stephen; Tsao, John; Hovanec, Christopher; Michael.Dilorenzo@aps.com; Thomas.N.Weber@aps.com
Subject: Palo Verde Nuclear Generating Station, Unit 3 - MPH B Official RAIs for RR-63, Impractical Examinations for the Third 10-Year ISI Interval (EPID L-2019-LLR-0002)

By letter dated January 10, 2019 (Agencywide Documents and Access Management System Accession No. ML19010A307), Arizona Public Service Company (APS, the licensee) requested relief from certain requirements of Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), sub-articles IWB-2500 and IWC-2500 for the third ten-year inservice inspection (ISI) interval at Palo Verde Nuclear Generating Station (PVNGS), Unit 3.

Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Section 50.55a(g)(5)(iii), APS submitted Relief Request (RR) 63 regarding ultrasonic examinations of certain welds that have been determined to be impractical. The licensee requested relief from the ASME Code requirements to achieve essentially 100 percent weld coverage while proposing alternatives.

We transmitted the draft requests for additional information (RAIs) from our Piping and Head Penetrations Branch (MPHB) for the subject RR on March 26, 2019, and at your request, held a clarification call on April 4, 2019. Please find the following **official** RAIs for the subject RR, and provide your responses by June 7, 2019, as mutually agreed during the clarification call. Please note that these RAIs are applicable to ASME Class 2 welds only in Tables 2 and 3 of the RR. RAIs, if any, for Class 1 welds will be transmitted to you later.

MPHB-RAI-1

Please discuss whether, as a substitute, examinations were performed on similar welds in the same piping systems that essentially 100 percent coverage could be achieved.

MPHB-RAI-2

One of the notes associated with Tables 2 and 3 of the relief request states that "...All piping material for C-F-1 welds in the Table above are Austenitic Stainless Steel..." Please discuss the exact weld metal (material specification) used in the welds of Tables 2 and 3.

MPHB-RAI-3

Tables 2 and 3 of the relief request show that welds are located in various zones. Please describe the location of these zones (inside or outside of the containment), how the zones are designated, operational leakage monitoring and radiation dose, if any, in these zones.

MPHB-RAI-4

Please discuss the design and operating conditions (e.g., temperature and pressure) of the welds in Tables 2 and 3 of the relief request.

Siva P. Lingam
U.S. Nuclear Regulatory Commission

Project Manager

Palo Verde Nuclear Generating Station, Units 1, 2, and 3

Grand Gulf Nuclear Station

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