



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

April 16, 2019

MEMORANDUM TO: Robert J. Pascarelli, Chief  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

FROM: G. Edward Miller, Project Manager */RA/*  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF APRIL 10, 2019, PUBLIC TELECONFERENCE  
REGARDING POTENTIAL SUBMISSION OF A RELIEF  
REQUEST TO ALLOW USE OF CARBON FIBER REINFORCED  
POLYMER FOR SELECTED PIPING REPAIRS  
(EPID L-2019-LRM-0019)

On April 10, 2019, the U.S. Nuclear Regulatory Commission (NRC) staff held a public teleconference<sup>1</sup> with the STP Nuclear Operating Company (STPNOC). The purpose of the meeting was to discuss STPNOC's intention to submit a relief request for South Texas Project, Units 1 and 2 (STP) that would allow for use of carbon fiber reinforced polymer material in repairs to STP's essential cooling water system. This request is to be a contingency should conditions requiring repair be identified in an inspection currently planned for early 2020.

During the meeting, STPNOC presented slides<sup>2</sup> that detailed the purpose, scope, technical basis, precedents, and desired review time of the request. During the discussion, the NRC staff asked questions and provided the following feedback:

- Ensure that the scope of the request is broad enough to cover anticipated repair conditions to minimize the need for an additional relief request;
- Address any differences between precedent that implemented full-length application of the repair versus local repairs;
- Address the analysis of any areas where the system transitions from below ground to above ground and terminal ends;

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<sup>1</sup> The original meeting notice is available via the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML19086A121.

<sup>2</sup> The licensee's slides are available under ADAMS Accession No. ML19095A656.

- Address any corrosion or other degradation mechanisms to which the aluminum bronze piping material may be susceptible;
- Discuss any pre-installation nondestructive examination that will be performed;
- Discuss any differences between straight runs of pipe and junctions or bends;
- Clearly identify and disposition any differences from precedent;
- Discuss the likelihood and potential consequences of material dislodging;
- Address the need for fire analysis for any piping repairs that are not encased or buried;
- Discuss any volumetric examinations that will be performed following repair;
- Discuss the results of any acceptance or mock-up testing that may have been performed; and
- Discuss any operating experience of previously applied carbon fiber reinforced polymer repairs at STP.

No regulatory decisions were made and the licensee indicated that it would consider the feedback provided by the NRC staff. The NRC staff indicated that the planned submittal in July 2019 and requested approval by January 2020 was significantly shorter than a standard review schedule. The NRC staff would evaluate its ability to accommodate this schedule as part of the acceptance review once the request had been submitted. Further, both parties acknowledged that the leveraging of review tools such as audits and public meetings may facilitate an accelerated review schedule.

Following the discussion, an opportunity was afforded to any other participants who wished to ask questions or make comments. No questions or comments were received.

Enclosure:  
List of Attendees

SUBJECT: SUMMARY OF APRIL 10, 2019, PUBLIC TELECONFERENCE REGARDING POTENTIAL SUBMISSION OF A RELIEF REQUEST TO ALLOW USE OF CARBON FIBER REINFORCED POLYMER FOR SELECTED PIPING REPAIRS (EPID L-2019-LRM-0019) DATED APRIL 16, 2019

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