

NRR-DMPSPeM Resource

From: Goetz, Sujata
Sent: Wednesday, May 15, 2019 2:19 PM
To: Jason R Haas
Subject: Request for Additional Information Regarding Fermi RR-A37
Attachments: Fermi RAI RR A37 .docx

Dear Mr. Haas,

By letter dated February 28, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19059A327), DTE Energy Company (the licensee) requested relief from the requirements of American Society of the Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code for Fermi 2 Power Plant. The licensee proposed alternative, RR-A37, allows for examination of nozzle-to-vessel welds and inner radii in accordance with the requirements of ASME BPV Code Case N-702 in lieu of Table IWB-2500-1 during the fourth, fifth, and sixth inservice inspection (ISI) intervals at Fermi 2 Power Plant. The licensee proposed alternative also allows the licensee to perform a VT-1 (visual) examination in lieu of a UT (ultrasonic) examination for the inner radii in accordance with the requirements of ASME BPV Code Case N-648-1. Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50.55a(z)(1), the licensee requested to use the proposed alternative on the basis that the alternative provides an acceptable level of quality and safety.

The Nuclear Regulatory Commission staff has reviewed your submittal and has determined that additional information, as stated in the attachment to this email, is needed to complete its review.

Your response is due to the NRC by June 17, 2019

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From: Goetz, Sujata

Created By: Sujata.Goetz@nrc.gov

Recipients:
"Jason R Haas" <haasj@dteenergy.com>
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REQUEST FOR ADDITIONAL INFORMATION
PROPOSED ALTERNATIVE REQUEST NO. RR-A37
FOURTH, FIFTH, AND SIXTH 10-YEAR INTERVAL INSERVICE INSPECTIONS
DTE ENERGY COMPANY
FERMI 2 POWER PLANT
DOCKET NO. 50-341
EPID: L-2019-LLR-0026

By letter dated February 28, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19059A327), DTE Energy Company (the licensee) requested relief from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code for Fermi 2 Power Plant. The licensee proposed alternative, RR-A37, allows for examination of nozzle-to-vessel welds and inner radii in accordance with the requirements of ASME BPV Code Case N-702 in lieu of Table IWB-2500-1 during the fourth, fifth, and sixth inservice inspection (ISI) intervals at Fermi 2 Power Plant. The licensee proposed alternative also allows the licensee to perform a VT-1 (visual) examination in lieu of a UT (ultrasonic) examination for the inner radii in accordance with the requirements of ASME BPV Code Case N-648-1. Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50.55a(z)(1), the licensee requested to use the proposed alternative on the basis that the alternative provides an acceptable level of quality and safety.

The U.S. Nuclear Regulatory Commission (NRC) staff has determined that additional information is necessary to complete its review of the licensee proposed alternative. The NRC staff's request for additional information (RAI) is provided below.

RAI-1

Code Case N-648-1 was conditionally approved in Regulatory Guide (RG) 1.147, Revision 18, "Inservice Inspection Code Case Acceptability, Section XI, Division 1, "dated March 2017. However, the licensee proposed alternative states that the VT-1 examination may be performed in accordance with a later approved revision of Code Case N-648 subject to the conditions of Regulatory Guide 1.147.

NRC staff has determined that the requirement in 10 CFR 50.55a(z) that proposed alternatives "must be submitted and authorized prior to implementation," precludes the NRC from authorizing the use of "a later approved revision" of Code Case N-648-1. Therefore, the NRC requests that the licensee supplement the February 28, 2019, proposed alternative request licensee, either:

- address only Revision 1 of Code Case N-648, or
- provide a basis by which the NRC could interpret the 10 CFR 50.55a(z) requirement "must be submitted and authorized prior to implementation" so as to permit the use of "a later approved revision."