Comanche Peak Unit 2 April 7, 2020, Presubmittal Teleconference Discussion Topics

Proposed Relief Requests for Deferral of Several Inspections and Tests from 2RF18 (Spring 2020) to 2RF19 (Fall 2021)

1. Inservice Inspection (ISI)

Applicable Code

ASME Section XI, 2007 Edition through the 2008 Addenda, subparagraph IWA-2430(c)(3), states:

- (c) For components inspected under the Inspection Program, the following shall apply:
- (3) That portion of an inspection interval described as an inspection period may be reduced or extended by as much as 1 year. This adjustment shall not alter the requirements for scheduling inspection intervals.

Request

Luminant is proposing that the extension allowed by IWA-2430(c)(3) be increased to 18 months. This allows deferral of ISI scope from 2RF18 to 2RF19.

2. Reactor Vessel Nozzle Dissimilar Metal Welds Ultrasonic (UT) Inspection

Applicable Code

American Society of Mechanical Engineers (ASME) Section XI, 2007 Edition through the 2008 Addenda Code Case N-770-2. The Hot Leg examinations required by Code Case N-770-2, Table 1, Item Number A-2

Request

Defer the inspection from 2RF18 to 2RF19.

3. Bottom Mounted Instrumentation (BMI) Visual Inspection

Applicable Code

ASME Section XI, 2007 Edition through the 2008 Addenda, N-722-1, 10 CFR 50.55a Codes and Standards

Request

Defer the inspection from 2RF18 to 2RF19.

4. Reactor Head Penetration Visual Inspection

Applicable Code

ASME Section XI, 2007 Edition through the 2008 Addenda, N-729-4; 10 CFR 50.55a Codes and Standards

Request

Defer the inspection from 2RF18 to 2RF19.

5. Snubbers

Applicable Code

ASME OM CODE 2004 Edition 2006 addenda, Subsection ISTD-4200, and Operational Readiness Testing, Subsection ISTD-5200.

Request

Defer the snubber testing and inspection from 2RF18 to 2RF19.

6. Inservice Testing (IST)

- -Check Valve Disassembly Examination-3 valves
- -Relief Valve Test-10 valves

Applicable Code

ISTC-5221(c)(3), I-1320, I-1350, I-1350(a)

Request

Defer the disassembly examination and relief testing from 2RF18 to 2RF19.