

From: Mahoney, Michael
Sent: Monday, February 1, 2021 9:01 AM
To: Sigmon, Chet Austin
Cc: Art Zaremba
Subject: Request for Additional Information - Duke Fleet RA-20-0263 - Use of Later ASME B&PV, XI for Repair-Replacement (L-2020-LLR-0124)
Attachments: RAIs - Duke Fleet - Use of Later ASME B&PV, XI for Repair-Replacement (L-2020-LLR-0124).docx

Chet,

Attached are RAIs for the subject Duke Fleet request RA-20-0263 dated September 16, 2020, for use of a provision of a later edition and addenda of American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (ASME Code), Section XI. Specifically, the licensee requested the use of paragraph IWA-4340, "Mitigation of Defects by Modification" of ASME Code, Section XI, 2017 Edition with no Addenda, subject to modifications and limitations imposed by Title 10 of the Code of Federal Regulations (10 CFR) 50.55a(b)(2) for repair and replace activities.

Please provide your response to the attached RAIs within 30 days of the date of this electronic correspondence.

Thanks

Mike Mahoney

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From: Mahoney, Michael

Created By: Michael.Mahoney@nrc.gov

Recipients:
"Art Zaremba" <Arthur.Zaremba@duke-energy.com>
Tracking Status: None
"Sigmon, Chet Austin" <Chet.Sigmon@duke-energy.com>
Tracking Status: None

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MESSAGE	930	2/1/2021 9:01:01 AM
RAIs - Duke Fleet - Use of Later ASME B&PV, XI for Repair-Replacement (L-2020-LLR-0124).docx		
31399		

Options
Priority: Normal
Return Notification: No
Reply Requested: No
Sensitivity: Normal
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REQUEST FOR ADDITIONAL INFORMATION
REQUEST TO USE A PROVISION OF A LATER EDITION AND ADDENDA OF THE
ASME BOILER AND PRESSURE VESSEL CODE, SECTION XI FOR
REPAIR/REPLACEMENT ACTIVITIES IN ACCORDANCE WITH 10 CFR 50.55A(G)(4)(IV)

DUKE ENERGY CAROLINAS, LLC

CATAWBA NUCLEAR STATION, UNITS 1 AND 2

MCGUIRE NUCLEAR STATION, UNITS 1 AND 2

OCONEE NUCLEAR STATION, UNITS 1, 2 AND 3

DOCKET NOS. 50-413, 50-414, 50-369, 50-370, 50-269, 50-270,

AND 50-287

DUKE ENERGY PROGRESS, LLC

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2

H.B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1

DOCKET NOS. 50-325, 50-324, 50-261, AND 50-400

EPID L-2020-LLR-0124

By letter RA-20-0263, dated September 16, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20260H326), Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (referred to collectively as Duke Energy or licensee) requests NRC approval to use a provision of a later edition and addenda of American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (ASME Code), Section XI. Specifically, the licensee requested the use of paragraph IWA-4340, "Mitigation of Defects by Modification" of ASME Code, Section XI, 2017 Edition with no Addenda, subject to modifications and limitations imposed by Title 10 of the Code of Federal Regulations (10 CFR) 50.55a(b)(2) for repair and replace activities on Class 1, 2, and 3 components.

During the Nuclear Regulatory Commission (NRC) staff's review of the license amendment request, the NRC staff determined that additional information was needed to complete the review.

Request for Additional Information (RAI) - 1

In the cover letter of the request, the licensee states, in part:

... requests NRC approval to use paragraph IWA-4340, "Mitigation of

Defects by Modification" of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV), Section XI, 2017 Edition no Addenda, subject to modifications and limitations imposed by 10CFR50.55a(b)(2) for Repair/Replacement Activities on Class 1, 2, and 3 components.

Paragraph IWA-4340 of ASME Code, Section XI, 2017 Edition does not include Class 1 components in its scope.

Please clarify whether the scope of the request includes repair and replacement activities for Class 1 components.

If the scope of the request includes repair and replacement activities for Class 1 components, provide justification for the inconsistency between the licensee's request and the scope of IWA-4340.

RAI – 2

Paragraph (g)(4)(iv) of 10 CFR 50.55a, "Codes and standards" states, in part, "Portions of editions or addenda may be used, provided that all related requirements of the respective editions or addenda are met."

Please confirm that the licensee's use of paragraph IWA-4340 will meet all related requirements of ASME Code, Section XI, 2017 Edition.

If not, provide justification for why all related requirements are not met.