

From: Wall, Scott
Sent: Tuesday, February 16, 2021 1:29 PM
To: Lashley, Phil H (EH)
Cc: Morgan, Jeffrey D.
Subject: Final 2nd Round RAI - Perry Request for Relief - Proposed Alternative Request SR-2, Rev. 0 (EPID: L-2021-LLR-0005)

Dear Mr. Lashley,

By letter dated January 15, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21018A004), Energy Harbor Nuclear Corp (EHNC, the licensee) submitted a relief request for Perry Nuclear Power Plant (PNPP) proposing a one-time extension of operational readiness testing for certain PNPP snubbers scheduled for the upcoming spring 2021 refueling outage.

The NRC staff has reviewed the submittals and determined that additional information is needed to complete its review. The specific questions are found in the enclosed request for additional information (RAI). By phone call on February 16, 2021, the EHNC staff indicated that a response to the RAIs would be provided by February 22, 2021.

If you have questions, please contact me at 301-415-2855 or via e-mail at Scott.Wall@nrc.gov.

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Docket No. 50-440

Enclosure:
Request for Additional Information

cc: Listserv

RAI-EMIB (SR-2)

REQUEST FOR ADDITIONAL INFORMATION

PROPOSED ALTERNATIVE TO AMERICAN SOCIETY OF MECHANICAL ENGINEERS

OPERATION AND MAINTENANCE CODE

SR-2, REVISION 0

ENERGY HARBOR NUCLEAR CORP.

ENERGY HARBOR NUCLEAR GENERATION, LLC

PERRY NUCLEAR POWER PLANT, UNIT NO. 1

DOCKET NO. 50-440

INTRODUCTION

By letter dated January 15, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21018A004), Energy Harbor Nuclear Corp (EHNC, the licensee) submitted a relief request, SR-2, Revision 0 (Proposed Alternative), to certain requirements of the American Society of Mechanical Engineers, Operation and Maintenance Code (ASME OM Code), for the fourth 10-year in-service testing (IST) Program for the Perry Nuclear Power Plant, Unit 1 (PNPP). Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) paragraph 50.55a(z)(2), the licensee requested approval of a one-time extension of operational readiness testing for certain PNPP snubbers scheduled for the upcoming spring 2021 refueling outage. The licensee's proposed alternative applies to the fourth IST interval.

In order for the U.S. Nuclear Regulatory Commission (NRC) staff to determine if the proposed alternative may be authorized pursuant to 10 CFR 50.55a(z)(2), the staff requests the licensee provide the following additional information.

APPLICABLE REGULATION AND GUIDANCE

The regulations in 10 CFR 50.55a(g)(4) state, in part, that ASME Code Class 1, 2, and 3 components (including supports) must meet the requirements, except the design and access provisions and the preservice examination requirements, set forth in the ASME OM Code for snubber examination and testing that become effective subsequent to editions and addenda specified in 10 CFR 50.55a(g)(2) and (3) and that are incorporated by reference in 10 CFR 50.55a(a), to the extent practical, within the limitations of design, geometry, and materials of construction of the components.

The regulations in 10 CFR 50.55a(z) state, in part, that alternatives to the requirements in paragraphs (b) through (h) of 10 CFR 50.55a may be authorized by the NRC if the licensee demonstrates that: (1) the proposed alternative provides an acceptable level of quality and safety, or (2) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. In order for the staff to determine if the proposed alternative may be authorized pursuant to 10 CFR 50.55a(z)(2), the staff requests the licensee provide the following additional information.

RAI-EMIB-08 (Follow-up to RAI-EMIB-01)

By letter dated February 8, 2021 (ADAMS Accession No. ML21039A785), the licensee responded to NRC-requested additional information. In its response to RAI-EMIB-01, the licensee provided the Service Life End Date of some of the Lisega Hydraulic Snubbers 10% plan. Specifically:

<u>Lisega Snubber</u>	<u>Service Life End Date</u>
1B21-H0453	10/20/2021
1E51-H0073	7/21/2021

1E51-H2078

7/21/2021

ASME OM Code, Subsection ISTD-6000 requires snubbers be replaced or reconditioned as required to ensure that the service life is not exceeded between surveillance inspections, during a period when the snubber is required to be operable. If the indicated service life will be exceeded prior to the next scheduled snubber service life review, the snubber service life shall be re-evaluated or the snubber shall be replaced or reconditioned so as to extend its service life beyond the date of the next scheduled service life review.

For the three snubbers above, the service life will end in July 2021 and October 2021, and the licensee is requesting for one-time extension until Spring 2023. The Service Life End Date of all the above specified Lisega Hydraulic Snubbers is much lower than the Spring 2023.

- Please explain how these snubbers will continue to perform their operation readiness function until Spring 2023 refueling outage.

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