

From: Wall, Scott
Sent: Thursday, May 20, 2021 12:32 PM
To: Michael K. Scarpello
Cc: Helen L Levendosky; Joe Tanko
Subject: Final RAI - D.C. Cook 1 & 2 - Relief Request ISIR-4-11, Impractical Examinations for the Fourth 10-Year ISI Interval (EPID No. L-2021-LLR-0017)

Dear Mr. Scarpello,

By letter dated March 1, 2021 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML21067A102), Indiana Michigan Power Company (I&M, the licensee) requested relief from the examination coverage requirement of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, at Donald C. Cook Nuclear Plant, Units 1 and 2 (CNP). Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), paragraph 50.55a(g)(5)(iii), the licensee submitted Relief Request ISIR-4-11 for Nuclear Regulatory Commission (NRC) review and approval on the basis that the required examination coverage is impractical due to physical obstructions and limitations imposed by design, geometry, and materials of construction of the subject components. The relief request presents the welds that were inspected during the fourth 10-year interval.

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). During a telephone call on May 20, 2021, the I&M staff indicated that a response to the RAIs would be provided by July 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 Nos. 50-315 and 50-316

Enclosure:
Request for Additional Information

cc: Listserv

RAI-NVIB (ISIR-4-11)

REQUEST FOR ADDITIONAL INFORMATION

PROPOSED ALTERNATIVE TO AMERICAN SOCIETY OF MECHANICAL ENGINEERS

BOILER AND PRESSURE VESSEL CODE

RELIEF REQUEST ISIR-4-11

INDIANA MICHIGAN POWER COMPANY

DONALD C. COOK NUCLEAR PLANT, UNIT NOS. 1 AND 2

DOCKET NOS. 50-315 AND 50-316

INTRODUCTION

By letter dated March 1, 2021 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML21067A102), Indiana Michigan Power Company (I&M, the licensee) requested relief from the examination coverage requirement of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, at Donald C. Cook Nuclear Plant, Units 1 and 2 (CNP). Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), paragraph 50.55a(g)(5)(iii), the licensee submitted Relief Request ISIR-4-11 for Nuclear Regulatory Commission (NRC) review and approval on the basis that the required examination coverage is impractical due to physical obstructions and limitations imposed by design, geometry, and materials of construction of the subject components. The relief request presents the welds that were inspected during the fourth 10-year interval.

The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing the application and has determined that the following additional information is required in order to complete the review.

APPLICABLE REGULATION AND GUIDANCE

Pursuant to 10 CFR 50.55a(g)(5)(iii), "ISI program update: Notification of impractical ISI Code requirements," if the licensee has determined that conformance with a ASME Code requirement is impractical for its facility, the licensee must notify the NRC and submit, as specified in § 50.4, information to support the determinations. Determinations of impracticality in accordance with 10 CFR 50.55a(g)(5)(iii) must be based on the demonstrated limitations experienced when attempting to comply with the ASME Code requirements during the ISI interval for which the request is being submitted. Requests for relief made in accordance with 10 CFR 50.55a(g)(5)(iii) must be submitted to the NRC no later than 12 months after the expiration of the initial or subsequent 120-month inspection interval for which relief is sought.

Pursuant to 10 CFR 50.55a(g)(6)(i), "Impractical ISI requirements: Granting of relief," the NRC will evaluate determinations under 10 CFR 50.55a(g)(5) that ASME Code requirements are impractical. The NRC may grant such relief and may impose such alternative requirements as it determines are authorized by law, will not endanger life or property or the common defense and security, and are otherwise in the public interest giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility.

RAI-NVIB-01

Attachment 1 to Relief Request ISIR-4-11 states that weld 6"-2-RC-22 at the pressurizer relief valve nozzle contains a previously detected indication.

- a. Discuss whether the indication has grown from the initial detection to the inspection performed in 2012.

- b. If the indication has grown, discuss on what basis it was determined that the indication will remain acceptable until the next inspection.

RAI-NVIB-02

Attachment 1 to Relief Request ISIR-4-11 reports that weld 6"-2-RC-25 at the pressurizer relief valve nozzle contains a previously detected indication (the first indication). Also, the licensee reported that it detected a second indication during the inspection performed in the 2012 refueling outage.

- a. Discuss whether the first indication has grown from the initial detection to the inspection performed in 2012;
- b. If the first indication has grown, discuss on what basis it was determined that the indication will remain acceptable until the next inspection; and
- c. Discuss the location of the first and second indications in the pipe wall thickness and clarify how these two indications were deemed acceptable (e.g. whether they were analyzed as single or as separate flaws).

RAI-NVIB-03

Attachment 1 to Relief Request ISIR-4-11 states that for the reactor pressure vessel (RPV) lower head dollar plate weld, 2-RPV-E (2-LHC-01), the licensee achieved an examination coverage of 47.61%. The licensee stated that the limited examination coverage was caused by the bottom mounted instrumentation tubes as shown in Figures 1.27-2 and 1.27-3. The licensee detected an indication in the weld during the inspection performed in 2019.

- a. Discuss how the bottom mounted instrument tubes obstructed the examination coverage of the subject weld.
- b. Discuss any efforts taken to increase the examination coverage. If no efforts were taken, please provide justification for the non-action

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