

Subsequent Audit Teleconference Topics for NextEra Energy SLRA Supplement 3
(NextEra Energy – Point Beach Letter No. L-2021-133; ADAMS Accession No. ML21147A115)

- SLRA Table 3.1-1, Updated Item 3.1.1-028 (on L-2021-113 Attachment, Page 10):

The line item was updated to state that: “Further evaluation is documented in subsection 3.1.2.2.11.” But the further evaluation basis for the line item is given in SLRA Section 3.1.2.2.9, as updated in SLRA Supplement 3.

Supplemental Teleconference Question: Shouldn’t the revision of the “Discussion” column entry for revised Item 3.1.1-028 state that “Further Evaluation is provided in subsection 3.1.2.2.9”?

- SLRA Table 3.1-1, Line Item 3.1.1-087.

The applicant did not use this line item for development of the SLRA, or for the updated AMR item basis in SLRA Supplement 3. However, during the first of two audit breakout sessions for the AMP and AMR items on reactor vessel internal (RVI) components, the staff informed that to avoid using SRP-SLR Table 3.1-1, Item 087, the applicant would need to take an exception on the “preventive actions” program element of GALL-SLR AMP XI.M16A, “PWR Vessel Internals.” The staff also explained to the applicant that the basis for inclusion of SRP-SLR Table 3.1-1, Item 087 and the related GALL-SLR AMR Item IV.B2.RP-24 was to avoid the necessity of including AMR line items on pitting and crevice corrosion of PWR RVI component that would be linked to the augmented condition monitoring (inspection) bases in GALL-SLR AMP XI.M16A, “PWR Vessel Internals,” especially for those RVI component that are designated as “No Additional Measures” components for the Reactor Vessel Internals Program (SLRA AMP B.2.3.7). The staff’s recollection is that during the audit breakout session, the applicant stated that it would be amending the SLRA to adopt the SRP-SLR Table 3.1-1 087 Item and the corresponding GALL-SLR IV.B2.RP-24 item; therefore, the staff did not issue an RAI on this matter. But the applicant did not amend the SLRA to adopt SRP-SLR Table 3.1-1, Item 087 and GALL-SLR Item IV.B2.RP-24 in SLRA Supplement 3.

The staff’s perspective on this matter (as discussed during the prior audit breakout sessions) is supported by two positions that have been accepted by the Commission in its endorsement of the SLR guidance NUREGs. In SRP-SLR Appendix A.1 (Branch Technical Position RLSB-1), Section A.1.2.1.5, the staff established its firm position that “*an aging effect should be identified as applicable for SLR even if there is a prevention or mitigation program associated with the aging effect.*” Furthermore, in the “preventive actions” program element of GALL-SLR AMP XI.M16A (as updated in Appendix D of ISG No. SLR-ISG-2021-01-PWRVI), the staff established its position that loss of material resulting from pitting and crevice corrosion in PWR reactor internals should be managed through implementation of the applicant Water Chemistry Program (Refer to GALL-SLR

AMP XI.M2; SLRA AMP B.2.3.2). This staff's positions are supported by Section 4.3 in NEI 17-01, which indicates "*preventive programs*" are used to manage aging effects (under 10 CFR 54.21(a)(3)) by preventing them from occurring and the "*mitigative programs*" manage aging effects by slowing the effects of aging. NEI 17-01 does not indicate that a preventive or mitigative program can be used to draw an 10 CFR 54.21(a)(1) integrated plant assessment-inferred conclusion that a given aging effect would not need to be managed in accordance with 10 CFR 54.21(a)(3).

If the applicant does not adopt SRP-SLR Table 3.1-1, Item 087 and GALL-SLR Item IV.B2.RP-24 for the SLRA, the SLRA does not include any Table 1 and Table 2 AMR line items to manage loss of material due to pitting and crevice corrosion in the SLRA (as amended through SLRA Supplement 3). Yet, as of SLRA Supplement 3, the applicant has yet to take an exception to the "*preventive actions*" program element in GALL-SLR AMP XI.M16A, "PWR Vessel Internals," that the program in SLRA AMP B.2.3.7, "Reactor Vessel Internals," does not credit the water chemistry program to manage loss of material that is induced by a pitting or crevice corrosion mechanism.

Supplemental Teleconference Question: If the applicant is still not using SRP-SLR Table 3.1-1, Item 087 and GALL-SLR Item IV.B2.RP-24 for the SLRA, wouldn't the applicant need to take an exception to the "*preventive actions*" program element statement in GALL-SLR AMP XI.M16A (as updated in SLR-ISG-2021-01-PWRVI) – that is, an exception on the "*preventive actions*" program element that states that the applicant is not relying on the Water Chemistry Program to manage loss of material due to pitting and crevice corrosion in the RVI components? The applicant should be prepared to discuss this topic further with the staff.

- Deletion of SLRA Item 3.1-1, 032 in SLRA Supplement 3 (on L-2021-113 Attachment, Page 11): In SLRA Supplement 3, the applicant SLRA Item 3.1-1, 032 from the scope of SLRA Table 3.1-1 and all related Table 2 AMR line items in SLRA Table 3.1.2-2 that referenced SLRA Table 1 Item 3.1-1, 032 and GALL-SLR AMR Item IV.B2.RP-382.

In ISG No. SLR-ISG-2021-01-PWRVI, the staff's deletion of AMR Item 032 in SRP-SLR Table 3.1-1 and of GALL-SLR Item IV.B2.RP-382 was predicated on two staff determinations that were discovered during the ISG update process: (1) inclusion of the SRP-SLR Table 3.1-1 032 line item was redundant with staff's updated version of SRP-SLR Table 3.1-1 Item 114 in Appendix A of the ISG, and (2) inclusion of GALL-SLR Item IV.B2.RP-382 item was redundant with the staff's updated version of GALL-SLR Item IV.E.R-444 that was made in Appendix B.4 of the ISG. However, as of SLRA Supplement 3, the applicant did not adopt or use SRP-SLR Table 3.1-1, Item 114 for the SLRA or adopt GALL-SLR Item IV.E.R-444 to manage cracking or loss of material in any reactor internals that are defined as ASME Code Class reactor vessel interior attachments or core support structure components in the Point Beach units.

Supplemental Teleconference Question: Was it NextEra Energy's intent to delete SLRA Item 3.1-1, 032 without a corresponding change in SLRA Supplement 3 to adopt and use SLRA Item 3.1-1, 114. Similarly, was it NextEra Energy's intent to delete all SLRA Table 3.1.2-2 AMR line items that referenced GALL-SLR Item IV.B2.RP-382 without amending SLRA Table 3.1.2-2 in SLRA Supplement 3 to include an AMR line item that references the amended versions of SRP-SLR Table 3.1-1, item 114 and GALL-SLR Item IV.E.R-444 in the ISG? If this is the case, this leaves the SLRA without any AMR Table 1 and Table 2 line items that credit SLRA AMP B.2.3.1, "ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD" Program for management or cracking or loss of material in reactor vessel internal components; and, the applicant should be prepared to this revised AMR basis with the staff.

- Changes to AMR items for Clevis Insert Components in the SLRA Supplement 3 Attachment Page 19.

- 1) The revised line item on "loss of material" of the clevis insert dowels on Page 19 references the revised version of GALL-SLR IV.B2.RP-399 in the ISG; yet the staff's Item IV.B2.RP-399 is the item that is used to manage cracking in the clevis insert components (including the dowels) and not non-cracking effects in the components (such as loss of material or changes in dimension, or for the bolts, loss of preload)

Supplemental Teleconference Question. Clarify why the last line item on "loss of material" of the clevis insert dowels on Page 19 is referencing the updated version of GALL-SLR Item IV.B2.RP-399 in the ISG and not IV.B2.RP-285?

- 2) In the staff's update of GALL-SLR Item IV.B2.RP-285 in the ISG, the staff included changes in dimension due to distortion as a new non-cracking aging effect and mechanism combination for the line item (which includes the clevis insert surfaces, dowels, and bolts/screws). The inclusion of changes in dimension was included based on generic operating experience with distortion occurring in one of the clevis insert assemblies at another U.S. non-Point Beach Westinghouse-design PWR units. The AMR item updates in SLRA Supplement 3 for the clevis insert assembly components do not include any line items for changes in dimension for the clevis insert assembly components (i.e., the clevis insert surfaces, dowels, and bolts/screws).

Supplemental Teleconference Discussion Topic: Applicant should be prepared to discuss (i.e., provide its rationale) why its updated AMR item basis in SLRA Supplement 3, Page 19 for managing non-cracking effects in the clevis insert assembly components (i.e., those for the clevis insert assembly surfaces, bolts/screws, and dowels) does not include "changes in dimension" (due to distortion) of the components.

- Changes to AMR items for baffle and former plates, baffle edge bolts, and baffle-to-former bolts in the SLRA Supplement 3 Attachment on Pages 20 and 21.

On Page 21, the applicant includes a line item for managing non-cracking effects in the baffle-to-former bolts, where the applicant amended the line item to include “loss of material” as an additional non-cracking effect (i.e., in addition to loss of fracture toughness, changes in dimension, and loss of preload) and where the applicant amended the line item to cite NEI Note A. The line item still references GALL-SLR Item IV.B2.RP-354, which was updated in the ISG; however, the updated line item in the ISG on non-cracking effects in Westinghouse-design baffle-to-former bolts was the staff’s update of GALL-SLR Item IV.B2.RP-272.

Supplemental Teleconference Question. In order to Cite NEI Note A in this line item, shouldn’t the appropriate GALL-SLR item reference in the line item be to GALL-SLR Item IV.B2.RP-272 (as updated in the ISG)?

- New AMR items for CRGT lower flange welds in remaining (accessible, non-peripheral) control rod guide tube assemblies in the SLRA Supplement 3 Attachment on Pages 24.

At the top of Page 24, the applicant added a new line item on “loss of fracture toughness” in stainless steel and CASS and stainless steel CRGT lower welds that are located in accessible, non-peripheral (i.e., remaining) CRGT assemblies citing NEI Note A, where the new line item is referenced to the new GALL-SLR Item IV.B2.RP-297a in the ISG. The new line item is perfectly acceptable; however, in the ISG, the staff also added a new GALL-SLR line item (IV.B2.RP-298a) to address cracking in the CRGT lower welds that are located in accessible, non-peripheral (i.e., remaining) CRGT assemblies. The update of SLRA Table 3.1.2-2 in SLRA Supplement 3 did not include the new corresponding Table 2-line item on cracking of the CRGT lower flange welds in the non-peripheral (remaining) CRGT assemblies.

Supplemental Teleconference Question. What is the basis for not including an analogous line item on cracking of the CRGT lower welds that are located in accessible, non-peripheral (i.e., remaining) CRGT assemblies, as referenced to the new GALL-SLR Item IV.B2.RP-298a and the update of SRP-SLR Table 3.1-1, Item 053b in the ISG and citing NEI Note A?