

From: Klos, John
Sent: Wednesday, September 8, 2021 12:14 PM
To: Sigmon, Chet Austin; Zaremba, Arthur H.
Cc: Klos, John
Subject: Formal release of RAIs, 30 day response, Mcguire relief request, Ref: later Edition Addenda ASME Code, Section XI, 50.55a(g)(4)(iv)

Chet, Art

By letter dated July 1, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession ML21182A028), Duke Energy Carolinas, LLC (aka, Duke Energy, the licensee) submitted a licensing action containing Enclosures 1, 2, and 3 in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(g)(4)(iv).

During the Nuclear Regulatory Commission (NRC) staff's review it was determined that more information was needed to complete the review. A clarification call was held on September 8, 2021 between the NRC staff and the licensee. This request for additional information (RAI) is now released formally with a 30 day calendar response period; thereby, these RAIs are due on October 8, 2021.

In the licensee's submittal the following is stated;

- Enclosure 1. Request to use the 2017 Edition of the ASME Code, Section XI, IWA-4540(b) for the pressure testing of the Class 1, 2, and 3 items following the repair/replacement activities in lieu of the 2007 Edition with 2008 Addenda.
- Enclosure 2. Request to use the 2017 Edition of the ASME Code, Section XI, IWA-5120, IWA-5213, IWA-5241, IWA-5242, and IWA-5250 for pressure testing of the Class 1, 2, and 3 systems in lieu of the 2007 Edition with 2008 Addenda.
- Enclosure 3. Request to use the 2017 Edition of the ASME Code, Section XI, IWA-4340 for repair/replacement activities in lieu of the 2007 Edition with 2008 Addenda.

The licensee submitted this request for the duration of the first inspection period of the fifth 10-year inservice inspection (ISI) interval at the McGuire Nuclear Station (McGuire), Unit 1.

To complete its review, the NRC staff requests the following additional information.

1. The NRC staff notes that Enclosure 3 did not identify the ASME Code Classes affected. Clarify which ASME Code Class (e.g., Class 1, Class 2, and/or Class 3) piping and associated supports will be affected in Enclosure 3.
2. The NRC staff notes that the regulations in 10 CFR 50.55a(b)(2)(xxvii), "Section XI condition: Removal of insulation," have conditions for use of ASME Code, Section XI, IWA-5241. Clarify whether all conditions in 10 CFR 50.55a(b)(2)(xxvii) will be complied with when using IWA-5241 of the 2017 Edition of the ASME Code, Section XI in Enclosure 2.
3. Clarify whether Enclosure 2 includes ASME Code, Section XI, IWA-2318 in addition to IWA-5120, IWA-5213, IWA-5241, IWA-5242, and IWA-5250.

Thanks in advance,

John Klos

DORL Mcguire and H.B. Robinson Licensing Project Manager

U.S. NRC, Office of Nuclear Reactor Regulation (NRR),

Division of Operating Reactor Licensing (DORL),

NRC/NRR/DORL/LPL2-1, MS O9E3

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Hearing Identifier: NRR_DRMA
Email Number: 1335

Mail Envelope Properties (BLAPR09MB6642D33A6AF759D0F8734826E3D49)

Subject: Formal release of RAIs, 30 day response, Mcguire relief request, Ref: later Edition Addenda ASME Code, Section XI, 50.55a(g)(4)(iv)
Sent Date: 9/8/2021 12:13:47 PM
Received Date: 9/8/2021 12:13:48 PM
From: Klos, John

Created By: John.Klos@nrc.gov

Recipients:
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Tracking Status: None
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Tracking Status: None

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Files	Size	Date & Time
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Priority: Normal
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