

From: Wall, Scott
Sent: Wednesday, March 30, 2022 3:00 PM
To: Lashley, Phil H (EH)
Cc: Morgan, Jeffrey D.; Nevins, Kathleen J
Subject: Final RAI - Perry Request for Relief - Proposed Alternative Request VR-12, Rev. 0 (EPID: L-2022-LLR-0004)

Dear Mr. Lashley,

By letter dated January 5, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22005A351), Energy Harbor Nuclear Corp (Energy Harbor) submitted proposed Alternative VR-12 for Perry Nuclear Power Plant (Perry). The propose alternative is related to the requirements of American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) of Nuclear Power Plants for certain Perry containment isolation valves.

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 March 30, 2022, the Energy Harbor staff indicated that a response to the RAI would be provided by April 29, 2022.

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-01 (VR-12)

REQUEST FOR ADDITIONAL INFORMATION

PROPOSED ALTERNATIVE TO AMERICAN SOCIETY OF MECHANICAL ENGINEERS

OPERATION AND MAINTENANCE

VR-12, REVISION 0

ENERGY HARBOR NUCLEAR CORP.

ENERGY HARBOR NUCLEAR GENERATION, LLC

PERRY NUCLEAR POWER PLANT, UNIT NO. 1

DOCKET NO. 50-440

By letter dated January 5, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22005A351), the licensee submitted Alternative Request VR-12 (Revision 0), "Request for Relief from Containment Isolation Valve ASME OM Code Requirements," for the Perry Nuclear Power Plant, Unit 1 (PNPP). In Alternative Request VR-12, the licensee proposed an extension of the testing interval for valve position indication for certain containment isolation valves required by the American Society of Mechanical Engineers (ASME) *Operation and Maintenance of Nuclear Power Plants*, Division 1, OM Code: Section IST (OM Code), Subsection ISTC, "Inservice Testing of Valves in Light-Water Reactor Nuclear Power Plants," paragraph ISTC-3700, "Position Verification Testing." The licensee's proposed alternative applies to the fourth ISI interval.

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

Applicable Regulation and Guidance

The Inservice Testing (IST) Program Code of Record for Perry is currently the 2012 Edition of the ASME OM Code. ASME OM Code, Subsection ISTC, paragraph ISTC-3700, states:

Valves with remote position indicators shall be observed locally at least once every 2 years to verify that valve operation is accurately indicated. Where practicable, this local observation should be supplemented by other indications such as use of flow meters or other suitable instrumentation to verify obturator position.

The NRC regulations in 10 CFR 50.55a(b)(3)(xi), "OM condition: Valve Position Indication," state the following:

When implementing paragraph ISTC-3700, "Position Verification Testing," in the ASME OM Code, 2012 Edition through the latest edition and addenda of the ASME OM Code incorporated by reference in paragraph (a)(1)(iv) of this section, licensees shall verify that valve operation is accurately indicated by supplementing valve position indicating lights with other indications, such as flow meters or other suitable instrumentation to provide assurance of proper obturator position for valves with remote position indication within the scope of Subsection ISTC including its mandatory appendices and their verification methods and frequencies.

Request for Additional Information

RAI-EMIB-01 (VR-12)

In the January 5, 2022 submittal, the licensee discusses its proposal for an alternative to the requirements in ASME OM Code, Subsection ISTC, paragraph ISTC-3700. However, the licensee does not discuss the actions to meet the requirements in 10 CFR 50.55a(b)(3)(xi) at the extended testing interval for valve position indication.

- Please describe the actions to be taken as part of Alternative Request VR-12 to meet 10 CFR 50.55a(b)(3)(xi) to verify that the remote indicating lights provide accurate indication of the obturator position for both the open and close stroke of each valve at PNPP within the scope of Alternative Request VR-12.

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