

John Klos

From: John Klos
Sent: Tuesday, March 5, 2024 11:10 AM
To: gary.d.miller@dominionenergy.com
Cc: John Klos
Subject: Formal RAI issuance Surry IST impractical Relief Request P-1, P-2 RHR containment pumps

Gary,

The RAI below is being released formally with a 30 day calendar response time, thereby, due Friday April 5th.

REQUEST FOR ADDITIONAL INFORMATION, RELIEF REQUEST P-2 IN ACCORDANCE WITH 10 CFR 50.55a(f)(5)(iii)
SIXTH INTERVAL INSERVICE TESTING PROGRAM

SURRY NUCLEAR POWER STATION, UNITS 1 AND 2
DOMINION ENERGY VIRGINIA
DOCKET NOS. 50-280 AND 50-281
EPID: L-2023-LLR-0058

Background

By letter dated October 12, 2023 (Agencywide Documents Access and Management System Accession No. ML23285A092), Virginia Electric and Power Company (Dominion Energy Virginia) submitted Relief Request P-2 to the U.S. Nuclear Regulatory Commission (NRC) in accordance with Title 10 of the Code of Federal Regulations (10 CFR) Section 50.55a, paragraph (f)(5)(iii), for certain containment spray pumps as part of the Sixth Interval Inservice Testing (IST) Program at the Surry Power Station (SPS), Units 1 and 2. With respect to a similar relief request (P-5) for containment spray pumps for the Fifth Interval IST Program at SPS, Units 1 and 2, Virginia Electric and Power Company had provided a response to an NRC request for additional information in a supplemental letter dated November 5, 2013 (ML13316A006). This additional information does not appear in Relief Request P-2 for containment spray valves for the Sixth Interval IST Program.

Regulatory Requirements

The NRC regulations in 10 CFR 50.55a(f)(4), Inservice testing standards requirement for operating plants, state, in part, that throughout the service life of a boiling or pressurized water-cooled nuclear power facility, pumps and valves that are within the scope of the American Society of Mechanical Engineers (ASME) Operation and Maintenance of Nuclear Power Plants, Division 1, OM Code: Section IST (OM Code) must meet the inservice test requirements (except design and access provisions) set forth in the ASME OM Code and addenda that become effective subsequent to editions and addenda specified in paragraphs 10 CFR 50.55a(f)(2) and (3) and that are incorporated by reference in paragraph 10 CFR 50.55a(a)(1)(iv), to the extent practical within the limitations of design, geometry, and materials of construction of the components.

The NRC regulations in 10 CFR 50.55a(f)(5), Requirements for updating IST programs, paragraph (iii), IST program update: Notification of impractical IST Code requirements, state:

If the licensee has determined that conformance with certain Code requirements is impractical for its facility, the licensee must notify the Commission and submit, as specified in § 50.4, information to support the determination.

The NRC regulations in 10 CFR 50.55a(f)(6), Actions by the Commission for evaluating impractical and augmented IST Code requirements, paragraph (i), Impractical IST requirements: Granting of relief, state:

The Commission will evaluate determinations under paragraph (f)(5) of this section that code requirements are impractical. The Commission may grant 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.

Request for Additional Information

1. Section 4, Reason for Request, in Relief Request P-2 in the paragraph titled "Surry Predictive Maintenance Program" states, in part, that for the containment spray pumps, the program employs predictive monitoring techniques, such as vibration monitoring and analysis beyond that required by the ASME OM Code, Subsection ISTB. The licensee is requested to summarize the vibration testing planned for the containment spray pumps as part of this relief request.

2. Section 4, Reason for Request, in Relief Request P-2 in the paragraph titled "Surry Predictive Maintenance Program" states, in part, that for the containment spray pumps, the program employs predictive monitoring techniques, such as oil sampling and analysis. The licensee is requested to specify the frequency of the oil sampling and analysis for the containment spray pumps.

Thanks in advance,

John Klos

DORL Mcguire, Surry Licensing Project Manager

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

Division of Operating Reactor Licensing (DORL),

NRC/NRR/DORL/LPL2-1, MS O8B01, O8B03

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