

June 14, 2001

APPLICANT: Southern Nuclear Operating Company, INC.

SUBJECT: SUMMARY OF WORKING MEETING WITH SOUTHERN NUCLEAR
OPERATING CO., INC., (SNC) REGARDING TREATMENT OF CATEGORY 2
PIPING FOR LICENSE RENEWAL

On May 24, 2001, representatives of Southern Nuclear Operating Co., Inc. (SNC) and Bechtel, met with the Nuclear Regulatory Commission (NRC) staff to clarify the current licensing basis (CLB) with regard to Category 2 piping.

The meeting was a followup to a meeting held on March 29, 2001, regarding several open items associated with the staff's review of the Plant Hatch license renewal application. The purpose of this followup meeting was to clarify how Category 2 piping (including Seismic II/I piping) is designed to prevent its failure from adversely affecting safety-related functions, as required by 10 CFR 54.4(a)(2). This issue was identified as Open Item 2.1.3.1-1 in the staff license renewal SER for Plant Hatch.

SNC and Bechtel provided information to the staff regarding how Category 2, high-, moderate-, and low-energy piping outside primary containment is treated in the CLB and design bases, how the effects of postulated failures of this piping are considered, and why the safety-related function of structures, systems, and components will not be adversely affected due to credible postulated failures of Category 2 (including seismic Category II/I) piping. The staff found that much of the information provided by SNC and Bechtel is not well-documented in the LRA, FSAR, or supporting documentation. As a result, the staff asked SNC to respond to the open item with a comprehensive and detailed explanation of the treatment of Category 2 piping.

In addition, SNC and the staff discussed SNC's belief that inclusion of Seismic II/I piping segments within the scope of license renewal is inappropriate. Specifically, for piping segments that could fall during a seismic event and damage safety-related SSCs, SNC seismically supports these piping segments and believes that it would require the pipe to break in two places between the seismic supports before it would fall and potentially impact safety-related equipment. SNC believes that the pipe breaking in two places between seismic supports is not a credible postulated failure, and that seismically supported piping falling on safety-related SSCs is a hypothetical failure event outside of the CLB and design bases, and therefore the associated seismic II/I piping need not be included within scope. The staff disagrees with SNC's approach. The staff believes that all piping whose failure could adversely impact safety-related functions should be included within the scope of license renewal. The staff's position is consistent with the guidance provided in the Statement of Consideration (SOC) for the license renewal rule. The SOC states that "The inclusion of non-safety-related systems, structures, and components whose failure could prevent other systems, structures, and components from accomplishing a safety function is intended to provide protection against safety function failure in cases where the safety-related structure or component is not itself impaired by age-related degradation but is vulnerable to failure from the failure of another structure or component that may be so impaired..."

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The staff requested that, in addition to clarifying the nature of the plant design features which protect safety-related SSCs from piping failures, the applicant decide whether they will (1) include Category 2 piping in the scope of the renewal review (either as a commodity or as specific segments whose failure could prevent satisfactory accomplishment of any of the functions identified in §54.4(a)(1) of the rule) and identify appropriate aging management practices or (2) appeal the scoping issue to more clearly present the applicant's basis for concluding that the failure of the piping is unnecessarily "hypothetical." Chris Grimes noted that the SNC decision must be concluded so that they can complete their response to the open items by June 8, 2001, to maintain the renewal review schedule.

The attachment is the attendees list.

/RA/

William F. Burton, Senior Project Manager
License Renewal and Standardization Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket Nos. 50-321 and 50-366

Attachment: As stated

cc w/att: See next page

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ADAMS ACCESSION NUMBER: ML011660023

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EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2
LICENSE RENEWAL APPLICATION
WORKING MEETING ON SCOPING
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APRIL 12, 2000

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Edwin I. Hatch Nuclear Plant Units 1 and 2

Docket Nos.: 50-321, 50-366

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