

Davis-BesseNPEm Resource

From: CuadradoDeJesus, Samuel
Sent: Wednesday, July 13, 2011 9:41 AM
To: 'custer@firstenergycorp.com'
Cc: 'dorts@firstenergycorp.com'
Subject: FW: Davis-Besse RAIs Related to the Applicant's New Internal Surfaces Monitoring Program.
Attachments: DB AMP RAI TRP 39 Internal Surfaces Klos Kichline 7-12-11.docx

Cliff:

More RAIs. These are on the new Internal Surfaces in Miscellaneous Piping and Ducting Program. Let me know if you have any question or will like to discuss them in a Teleconference. I'll be issuing these as all other asap.

Thanks

Hearing Identifier: Davis_BesseLicenseRenewal_Saf_NonPublic
Email Number: 2923

Mail Envelope Properties (Samuel.CuadradoDeJesus@nrc.gov20110713094100)

Subject: FW: Davis-Besse RAIs Related to the Applicant's New Internal Surfaces
Monitoring Program.
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From: CuadradoDeJesus, Samuel

Created By: Samuel.CuadradoDeJesus@nrc.gov

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"dorts@firstenergycorp.com" <dorts@firstenergycorp.com>
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MESSAGE	263	7/13/2011 9:41:00 AM	
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Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
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Davis Besse
TRP 39 – Inspection of Internal Surfaces

RAI B2.41-1

The SRP-LR, Revision 2, Section A.1.2.3.4, describes the recommendations for an acceptable detection of aging effects program element for a plant-specific program and states that “the discussion [of the inspection method or technique] should provide justification, including codes and standards referenced, that the technique and frequency are adequate to detect the aging effects before a loss of SC-intended function.”

The applicant’s Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Program, as provided in LRA Section B.2.41 by letters dated May 24, 2011, and June 3, 2011, states that “enhanced visual exams” will be conducted to manage cracking for susceptible stainless steel components. However, the LRA does not state to what predetermined criteria (standard) enhanced visual examinations will be conducted.

Issue

The LRA does not state the standard that enhanced visual examinations will be conducted against.

Request

Revise LRA Section B.2.41, Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Program, to indicate the standard to which enhanced visual examinations will be conducted in order to manage cracking.

RAI B2.41-2

Background

The SRP-LR, Revision 2, Section A.1.2.3.10, describes the recommendations for an acceptable operating experience program element for new AMPS and states that “an applicant should commit to a review of future plant-specific and industry operating experience for new programs to confirm their effectiveness.”

LRA Table A-1, Davis-Besse License Renewal Commitments, does not include a commitment to perform a review of future operating experience to confirm the effectiveness of the new Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components Program.

Issue

This program’s LRA commitment list is not consistent with the current staff position as stated within the SRP-LR, Revision 2 concerning reviews of future operating experience for new aging management programs.

Request

Revise LRA Table A-1, Davis-Besse License Renewal Commitments, for the Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components Program to include a commitment to perform a future review of operation experience to confirm the effectiveness of this program or justify why such a review is not necessary.

Davis Besse
TRP 39 – Inspection of Internal Surfaces

RAI B2.41-3

Background

SRP-LR, Revision 2, Table 3.0-1 states that the recommended description for the FSAR supplement for a plant-specific AMP should include the bases for determining that aging effects will be managed during the period of extended operation.

The applicant's Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Program's USAR supplement provided in LRA Section A.1.41 by letters dated May 24, 2011, and June 3, 2011, does not state what type of inspections will be used to manage the program's aging effects.

Issue

The USAR supplement for the applicant's Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Program does not state the type of inspections that will be used to manage the program's aging effects, and therefore does not adequately describe the basis for how the program will manage aging effects during the period of extended operation.

Request

Revise the USAR supplement associated with the Internal Surfaces in Miscellaneous Piping and Ducting Program to include the type of inspections that will be used to manage the program's aging effects, consistent with SRP-LR, Revision 2, or justify why the revision is not necessary.