

## Davis-BesseNPEm Resource

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**From:** CuadradoDeJesus, Samuel  
**Sent:** Wednesday, August 03, 2011 8:50 AM  
**To:** dorts@firstenergycorp.com; 'custer@firstenergycorp.com'  
**Subject:** Conference call to discuss Draft RAI on Class 1 Valves  
**Attachments:** D-RAI 4 3 2 3 2-1 (Supplement) DB - JMedoff - Oyee.docx

Cliff and Steve:

if possible we'll like to include the discussion of the attached Draft RAI on our conference call tomorrow. I'll be sending a meeting request for a Teleconference tomorrow to discuss the attached Draft RAI and also to continue our discussion of our last Teleconference call on CSA vent valve body and plenum cylinder reinforcing plate made of CASS. Let me know if your team will be able to support the conference call.

Regards,

**Samuel Cuadrado de Jesús**

Project Manager

Projects Branch1

Division of License Renewal

U.S. Nuclear Regulatory Commission

Phone: 301-415-2946

[Samuel.CuadradoDeJesus@nrc.gov](mailto:Samuel.CuadradoDeJesus@nrc.gov)

**Hearing Identifier:** Davis\_BesseLicenseRenewal\_Saf\_NonPublic  
**Email Number:** 3103

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**Subject:** Conference call to discuss Draft RAI on Class 1 Valves  
**Sent Date:** 8/3/2011 8:50:09 AM  
**Received Date:** 8/3/2011 8:50:00 AM  
**From:** CuadradoDeJesus, Samuel

**Created By:** Samuel.CuadradoDeJesus@nrc.gov

**Recipients:**  
"dorts@firstenergycorp.com" <dorts@firstenergycorp.com>  
Tracking Status: None  
"custer@firstenergycorp.com" <custer@firstenergycorp.com>  
Tracking Status: None

**Post Office:**

Files	Size	Date & Time
MESSAGE	719	8/3/2011 8:50:00 AM
D-RAI 4 3 2 3 2-1 (Supplement) DB - JMedoff - Oyee.docx		31555

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

#### **D-RAI 4.3.2.3.2-1 - (Supplement)**

##### Background:

By letter dated June 22, 2011, the applicant responded to RAI 4.1-1 regarding cumulative usage factor (CUF) or  $I_t$  fatigue analyses for Class 1 valves. In its response to RAI 4.1-1, Request 1, Part A, the applicant identified 12 large bore Class 1 valves (i.e., valves with nominal pipe sizes in excess of 4-inches NPS) that should have received CUF or  $I_t$  fatigue analyses in accordance with the design codes (i.e., 1971 or more recent Editions of the ASME Code Section III, or the 1968 Edition of the Draft ASME Pump and Valve Code for Nuclear Power Plants). The applicant committed (Commitment No. 46) to the complete the following, prior to April 22, 2015:

FENOC commits to perform a fatigue evaluation in accordance with the requirements of the ASME Code of record for the Davis Besse Class 1 valves that are greater than 4 inches nominal pipe size. The applicable valve identification numbers are CF28, CF29, CF30, CF31, DH76, DH77, DH11, DH12, DH1A, DH1B, DH21, and DH23.

LRA Section 4.3.2.3.2, as amended by letter dated June 22, 2011, states that the fatigue analyses for these 12 referenced large bore Class 1 valves are as TLAAs and are dispositioned in accordance with 10 CFR 54.21(c)(1)(iii), that the effects of fatigue on Class 1 valves greater than 4 inches diameter nominal pipe size will be managed for the period of extended operation by the Fatigue Monitoring Program. LRA Section 4.3.2.3.2 also states that the issue with the missing CUF or  $I_t$  calculations for the 12 referenced large bore Class 1 valves has been entered into the applicant's Corrective Actions Program.

##### Issue:

The information provided by the applicant in letter of June 22, 2011, did not provide clarifying information regarding whether the applicant had any ASME Code Section III NB-3222.4(d) fatigue waiver assessments (or equivalent waiver assessments permitted by the 1968 Draft ASME Pump and Valve Code) for the 12 large bore Class 1 valves referenced in Commitment No. 46. Therefore, the staff requests additional information regarding whether fatigue calculations were required for these valves as part of the applicant's CLB. 10 CFR 54.30 states that:

(a) If the reviews required by § 54.21 (a) or (c) show that there is not reasonable assurance during the current license term that licensed activities will be conducted in accordance with the CLB, then the licensee shall take measures under its current license, as appropriate, to ensure that the intended function of those systems, structures or components will be maintained in accordance with the CLB throughout the term of its current license.

(b) The licensee's compliance with the obligation under Paragraph (a) of this section to take measures under its current license is not within the scope of the license renewal review.

The staff is concerned that, if the CUF or  $I_t$  analyses are currently required as part of the applicant's CLB, unless there is an appropriate fatigue waiver or fatigue exemption for the large bore Class 1 valves identified, such analyses should be available for staff review now as opposed to via a future commitment.

Request:

Clarify whether the CUF or  $I_t$  analyses for each of the 12 large bore Class 1 valves are required as part of the applicant's CLB. If so, provide justification for not having the analyses for staff review as part of the LRA, or provide your appropriate fatigue waiver or fatigue exemption bases for not having such analyses.