

## Davis-BesseNPEm Resource

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**From:** CuadradoDeJesus, Samuel  
**Sent:** Thursday, August 04, 2011 7:29 AM  
**To:** 'custer@firstenergycorp.com'; dorts@firstenergycorp.com  
**Attachments:** D-RAI 4 3 2 3 2-1 (Supplement) DB - JMedoff - Oyee (v2).docx

Cliff:

We also revised the attached D-RAI. We left the portion that deals with the CLB compliance out, NRR/DORL and the Region will take care of that part. We'll discuss this in today's Teleconference.

Thanks

**Samuel Cuadrado de Jesús**

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**Mail Envelope Properties** (Samuel.CuadradoDeJesus@nrc.gov20110804072800)

**Subject:**  
**Sent Date:** 8/4/2011 7:28:33 AM  
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**From:** CuadradoDeJesus, Samuel

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

**Recipients:**  
"custerc@firstenergycorp.com" <custerc@firstenergycorp.com>  
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#### **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 provided 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 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 are required for these valves.

The staff is concerned that without the CUF or  $I_t$  analyses or an appropriate fatigue waiver or exemption for these 12 large bore Class 1 valves, the staff would not be able to evaluate whether the aging effects will be appropriately managed by the commitment.

##### Request:

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.