

NRR-PMDAPEm Resource

From: Mozafari, Brenda
Sent: Friday, April 19, 2013 2:42 PM
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Cc: Purnell, Blake
Subject: Expedited email to ADAMS

OFFICE OF NUCLEAR REACTOR REGULATION
REQUEST FOR ADDITIONAL INFORMATION
FOR DRESDEN UNITS 2 and 3
EXELON GENERATION COMPANY, LLC
RELIEF REQUEST NOS. I5R-01, I5R-02, and I5R-07
DOCKET NUMBERS 50-237 and 50-249
TAC Nos. ME9682-83, ME9684-85, and ME9692-93

By letter to the U.S. Nuclear Regulatory Commission (NRC) dated September 28, 2012 (Agencywide Documents Access and management System (ADAMS) Accession No. ML12275A069), as supplemented by letter dated November 19, 2012 (ADAMS) Accession No. ML123250319), Exelon Generation Company, LLC (the licensee) submitted proposed relief requests (RR) I5R-01, I5R-02, and I5R-07. The NRC staff determined that the following additional information is necessary to complete the review of RR I5R-01, I5R-02, and I5R-07.

Based on the staff's review of Relief Request I5R-01:

1. Discuss in the Relief Request why the proposed alternative provides reasonable assurance of structural integrity or leak tightness of the subject component(s).
2. Discuss in the Relief Request how the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and quality and safety.
3. Provide a technical basis as to why the ultrasonic testing is not required.

Based on the staff's review of Relief Request I5R-02:

1. Do the augmented inspection programs for IGSCC Category B-G (Generic Letter 88-01), service water integrity (Generic Letter 89-13), FAC (Generic Letter 89-09), and high-energy line break (HELB)(USNRC Branch Technical Position MEB 3-1) remain unaffected (as described in the initial DNPS RI-ISI submittal dated October 18, 2000) by the RI-ISI program developed for the fifth interval?
2. Are the inspection locations in the DNPS RI-ISI programs that have been developed for the fifth 10-year interval the same locations as those in the fourth interval RI-ISI programs approved in the NRC staff's September 4, 2003, safety evaluation? If not, please summarize the changes to the program and what caused those changes.
3. If there are changes in the inspection locations for the DNPS fifth 10-year interval RI-ISI programs please provide information for the fifth interval program regarding: examinations/system/components/degradation mechanisms/class, etc. similar to that provided in Tables 2, 3, 4, 5 and 6 of the original submittal of the RI-ISI program for the DNPS third 10-year inservice inspection interval dated October 18, 2000 (ADAMS Accession No. ML003762371).

Based on the staff's review of Relief Request I5R-07:

1. The staff requests that the licensee identify whether there are any furnace-sensitized stainless steel vessel attachment welds associated with the RVI components at the Dresden Nuclear Power Station, Units 2 and 3. It is requested that the licensee provide an explanation regarding the type of inspection program and any additional augmented inspection program that are implemented for any existing furnace-sensitized stainless steel attachment welds in these boiling water reactor (BWR) units.
2. The staff requests that the licensee confirm whether NUREG-0619, "BWR Feedwater Nozzle and Control Rod Drive Return Line Nozzle Cracking," will be used for the inspection of feedwater sparger tee welds and feedwater sparger piping brackets.
3. Section 4.1 item 5 of the BWRVIP-100-A report, "Updated Assessment of the Fracture Toughness of Irradiated Stainless Steel for BWR Core Shrouds," states that fracture toughness values of stainless steel materials that are exposed to a neutron fluence value greater than $1 \times 10^{21} \text{ n/cm}^2$ ($E > 1 \text{ MeV}$) are lower than those used in Appendix C of the BWRVIP-76 report, "BWR Core Shroud Inspection and Flaw Evaluation Guidelines." Identify whether the core shroud welds and base materials will be exposed to a neutron fluence value greater than $1 \times 10^{21} \text{ n/cm}^2$ ($E > 1 \text{ MeV}$) during the current ISI interval. Since the inspection frequency in the BWRVIP-76 report is based on fracture toughness values which are not consistent with the BWRVIP-100-A report, the staff requests that the licensee address the following issue:

The inspection frequency and strategy that are specified in Section 3 of the BWRVIP-76 report require further evaluation taking into account the lower fracture toughness values that are specified in the BWRVIP-100-A report.

4. Dresden and Quad Cities (D/QC) Safety Evaluation Report, "NUREG-1796, Related to the License Renewal of the Dresden Nuclear Power Station, Units 2 and 3 and Quad Cities Nuclear Power Station, Units 1 and 2," License Renewal Commitment (LRA) #9 in Appendix A of NUREG-1796 states that the licensee should implement the staff approved AMP for the steam dryers at the D/QC units. In July 2009, the BWRVIP issued a staff approved topical report BWRVIP-139-A, "BWR Vessel and Internals Project, Steam Dryer Inspection and Flaw Evaluation Guidelines." The staff requests that the licensee confirm that it will comply with the guidelines addressed in the BWRVIP-139-A report as per LRA #9 in NUREG-1796.
5. Consistent with the LRA commitment #9, with respect to the AMP related to the top guide, the licensee should confirm that it will comply with the inspection guidelines addressed in the BWRVIP-26-A and BWRVIP-183 reports.

To support the schedule for approval the response are expected by May 30, 2013.

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