

January 10, 2014

MEMORANDUM TO: FILE

FROM: Nadiyah S. Morgan, Project Manager */ra/*  
Plant Licensing Branch I-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulations

SUBJECT: CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NO. 2 –  
SUMMARY OF TELEPHONE CONFERENCE REGARDING THE  
VERBAL AUTHORIZATION OF RELIEF REQUEST RR-ISI-04-09  
(TAC NO. MF3074)

This memorandum summarizes the telephone discussion on December 12, 2013, between the U.S. Nuclear Regulatory Commission (NRC) staff and Calvert Cliff Nuclear Power Plant, LLC, the licensee. The discussion was in regard to the licensee's request for relief RR-ISI-04-09 for Calvert Cliffs Nuclear Power Plant, Unit No. 2 (Calvert Cliffs). Participants in the discussion included:

<u>NRC</u>	<u>Licensee</u>
Dee Morgan	Ken Greene
Ben Beasley	Kurt Bodine
John Tsao	Emran Hussain
Dave Alley	Amy Cordner
	Bernie Rudell

By letter dated November 14, 2013, as supplemented by letter dated December 6, 2013, the licensee requested relief from certain requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, IWA-4000 for Calvert Cliffs. The licensee proposed an alternative repair for a degraded 12-inch saltwater system pipe, as documented in Relief Request RR-ISI-04-09. The licensee proposed to install a temporary mechanical clamp at the defect area of the subject pipe until the next refueling outage in February 2015 or until the unit enters a shutdown of sufficient duration before the scheduled refueling outage. At that time, the mechanical clamp will be removed and the licensee will permanently repair/replace the subject pipe in accordance with the ASME Code, Section XI.

The licensee proposed to install a mechanical clamp at the defect area of the subject pipe, based on the requirements of Appendix IX to the ASME Code, Section XI. The NRC staff finds that the proposed mechanical clamp has satisfied the requirements of Appendix IX to the ASME Code, Section XI, except that, the nominal pipe size of the subject line is 12-inch and Appendix IX limits the clamp application to a pipe size of 6 inches or smaller in diameter. The NRC staff finds the deviation acceptable because the pipe carries low energy coolant and the consequence of leakage from this pipe is not severe.

On the basis of information submitted, the NRC staff has determined that the proposed repair will restore the pressure boundary and provide reasonable assurance that the structural integrity of the repaired saltwater piping will be maintained until the next refueling outage in February 2015 or until the unit enters a shutdown of sufficient duration before the next scheduled refueling outage. The NRC staff finds that complying with the specified ASME Code requirement would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. Accordingly, the NRC staff concluded that the licensee adequately addressed all of the regulatory requirements set forth in Title 10 of the *Code of Federal Regulations* Section 50.55a(a)(3)(ii).

Effective December 12, 2013, the NRC staff authorized the use of Relief Request RR-ISI-04-09 at Calvert Cliffs for the repair of the degraded saltwater system piping up to the next refueling outage, scheduled for February 2015 or until the unit enters a shutdown of sufficient duration before the scheduled refueling outage.

All other requirements of ASME Code, Section XI, for which relief was not specifically requested and authorized by the NRC staff remain applicable, including the third party review by the Authorized Nuclear In-service Inspector.

This verbal authorization does not preclude the NRC staff from asking additional clarifying questions regarding Relief Request RR-ISI-04-09 while preparing the subsequent written safety evaluation. The NRC staff's goal is to issue the written authorization documenting the NRC staff's safety evaluation within 150 days in accordance with the Office of Nuclear Reactor Regulation procedures.

The licensee did not have any comments or questions.

Docket No. 50-318

On the basis of information submitted, the NRC staff has determined that the proposed repair will restore the pressure boundary and provide reasonable assurance that the structural integrity of the repaired saltwater piping will be maintained until the next refueling outage in February 2015 or until the unit enters a shutdown of sufficient duration before the next scheduled refueling outage. The NRC staff finds that complying with the specified ASME Code requirement would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. Accordingly, the NRC staff concluded that the licensee adequately addressed all of the regulatory requirements set forth in Title 10 of the *Code of Federal Regulations* Section 50.55a(a)(3)(ii).

Effective December 12, 2013, the NRC staff authorized the use of Relief Request RR-ISI-04-09 at Calvert Cliffs for the repair of the degraded saltwater system piping up to the next refueling outage, scheduled for February 2015 or until the unit enters a shutdown of sufficient duration before the scheduled refueling outage.

All other requirements of ASME Code, Section XI, for which relief was not specifically requested and authorized by the NRC staff remain applicable, including the third party review by the Authorized Nuclear In-service Inspector.

This verbal authorization does not preclude the NRC staff from asking additional clarifying questions regarding Relief Request RR-ISI-04-09 while preparing the subsequent written safety evaluation. The NRC staff's goal is to issue the written authorization documenting the NRC staff's safety evaluation within 150 days in accordance with the Office of Nuclear Reactor Regulation procedures.

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Docket No. 50-318

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