

NRR-PMDAPEm Resource

From: Singal, Balwant
Sent: Friday, January 03, 2014 7:59 AM
To: "Hope, Timothy" (Timothy.Hope@luminant.com)
Cc: "Jack.Hicks@luminant.com" (Jack.Hicks@luminant.com)
Subject: Request for Additional Information (RAI) - Relief Request (RR) C-3 - TAC No. MF2997
Attachments: MF2997-RAIs.docx

Tim,

By letter dated October 31, 2013 (Agencywide Documents Access and Management Systems (ADAMS) Accession No. ML13312A121), Luminant Generation Company LLC (the licensee) submitted for the U.S. Nuclear Regulatory Commission (NRC) approval relief request (RR) C-3 for Comanche Peak Nuclear Power Plant (CPNPP), Unit 2. The licensee proposed an alternative to a certain requirement of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI. RR C-3 relates to the inservice inspection (ISI) requirement of IWC-5220 of the ASME Code, Section XI, for the system leakage test of the reactor pressure vessel (RPV) flange leak-off piping.

The NRC staff issued the Draft RAIs on December 24, 2013. The NRC staff was informed by you via e-mail on January 2, 2014 that a clarification call is not needed. You are requested to provide your response to the attached RAIs within 30 days from the date of this e-mail. Please treat the attached RAI as a formal request.

Thanks.

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Tracking Status: None
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REQUEST FOR ADDITIONAL INFORMATION
REQUEST FOR ALTERNATIVE C-3 REGARDING SYSTEM LEAKAGE TEST OF REACTOR
PRESSURE VESSEL FLANGE LEAK-OFF PIPING
LUMINANT GENERATION COMPANY LLC
COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 2
DOCKET NUMBER 50-446

By letter dated October 31, 2013 (Agencywide Documents Access and Management Systems (ADAMS) Accession No. ML13312A121), Luminant Generation Company LLC (the licensee) submitted for the U.S. Nuclear Regulatory Commission (NRC) approval relief request (RR) C-3. The licensee proposed an alternative to a certain requirement of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI. RR C-3 relates to the inservice inspection (ISI) requirement of IWC-5220 of the ASME Code, Section XI, for the system leakage test of the reactor pressure vessel (RPV) flange leak-off piping. The licensee submitted the request for the Comanche Peak Nuclear Power Plant (CPNPP), Unit 2.

The NRC staff requests the following additional information.

1. The NRC requires deviations from the ASME Code, Section XI, be pre-approved in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(a)(3)(ii). The licensee submitted RR C-3 for the second 10-year ISI interval which commenced on August 3, 2004, and will end on August 2, 2014. The RPV flange leak-off piping is subject to a system leakage test each inspection period in accordance with the ASME Code, Section XI. Please discuss whether the system leakage tests have been performed in accordance with the ASME Code, Section XI, IWC-5220, in the previous inspection period(s) of the second 10-year ISI interval. If the answer is No, please discuss the reason(s) for not obtaining the NRC prior-authorization for deviation from the requirement in the previous inspection period(s) of the second 10-year ISI interval. If the answer is Yes, please discuss why the required test cannot be performed in the current inspection period of the second 10-year ISI interval.
2. Could the subject piping be pressurized and inspected at the beginning of a refueling outage before removing the RPV head? Please discuss the hardship and potential personnel radiation exposure for performing the system leakage test in accordance with the ASME Code, Section XI, IWC-5220. The NRC staff notes that the licensee addressed this question in the Request for Additional Information response dated January 9, 2013 (ADAMS Accession No. ML130250339) for the CPNPP, Unit 1, as a supplement to the request for RR C-2 dated August 23, 2012 (ADAMS Accession No. ML12250A670). Please state if the licensee's response for CPNPP, Unit 1 be applicable to CPNPP, Unit 2?