

NRR-PMDAPEm Resource

From: Rankin, Jennivine
Sent: Wednesday, August 19, 2015 10:31 AM
To: MIKSA, JAMES P (jmiksa@entergy.com); ERICKSON, JEFFREY S (JERICKS@entergy.com)
Subject: Palisades - Request for Additional Information Regarding the Relief Request No. RR 5-2 (MF6248)
Attachments: Final RAI for RR 5-2.docx

Mr. Miksa and Mr. Erickson,

By letter dated May 19, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15142A643), Entergy Nuclear Operations, Inc. (ENO, the licensee) requested approval of alternative testing associated with the inservice testing (IST) program fifth 10-year interval for Palisades Nuclear Plant. RR 5-2 requests to use American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) Code Case OMN-20, "Inservice Test Frequency," as an alternative to the test frequencies specified in ASME OM Division 1 Section IST for pumps and valves. RR 5-3 requests to use a previously authorized relief for the current fourth 10 year IST interval concerning stroke timing requirements of the ASME OM Code, Subsection ISTC for two valves.

The U.S. Nuclear Regulatory Commission staff has reviewed the information provided and determined that additional information is required in order to complete its review.

A draft request for additional (RAI) was transmitted on August 5, 2015, and a clarification call was held on August 19, 2015. As agreed upon during the clarification call, please submit your response to the RAIs by September 18, 2015. If you wish to alter the date of your response, please contact me at (301) 415-1530.

Thank you,
Jennie

Jennie Rankin, Project Manager
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

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Recipients:

"MIKSA, JAMES P (jmiksa@entergy.com)" <jmiksa@entergy.com>

Tracking Status: None

"ERICKSON, JEFFREY S (JERICKS@entergy.com)" <JERICKS@entergy.com>

Tracking Status: None

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Options

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REQUEST FOR ADDITIONAL INFORMATION
REGARDING REQUEST NUMBER RR 5-2
FOR THE INSERVICE TESTING PROGRAM FIFTH 10-YEAR INTERVAL
ENTERGY NUCLEAR OPERATIONS, INC.
PALISADES NUCLEAR PLANT
DOCKET NO. 50-255

By letter dated May 19, 2015(Agencywide Documents Access and Management System (ADAMS) Accession No. ML15142A643),Entergy Nuclear Operations, Inc.(ENO, the licensee) requested approval of alternative testing associated with the inservice testing (IST) program fifth 10-year interval for Palisades Nuclear Plant. The U.S. Nuclear Regulatory Commission staff has reviewed the information provided and determined that additional information is required in order to complete its review.

Request RR 5-2 (RAI -1)

10 CFR 50.55a(f), "Inservice Testing Requirements," requires, in part, that IST of certain American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components must meet the requirements of the ASME Operation and Maintenance (OM) Code and applicable addenda, except where alternatives have been authorized pursuant to paragraphs 10 CFR 50.55a(z)(1) or 10 CFR 50.55a(z)(2).

In proposing alternatives, a licensee must demonstrate that the proposed alternatives provide an acceptable level of quality and safety (10 CFR 50.55a(z)(1)) or compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety (10 CFR 50.55a(z)(2)).

RR 5-2 requests to apply ASME OM Code Case OMN-20 "Inservice Test Frequency" for the duration of the fifth 10-year IST interval in lieu of the test frequency requirements of ASME OM Code. A Code Case is the official method of handling a reply to an inquiry when study indicates that the Code wording needs clarification, or when the reply modifies the existing requirements of the Code, or grants permission to use alternative methods. ASME publishes Code Cases issued by the Operation and Maintenance Committee concerning the OM Code as part of the update service to the OM Code. Code Cases remain in effect for the applicable code editions and addendums, until they are annulled.

10 CFR 50.55a(b)(6), "Conditions on Operation and Maintenance of Nuclear Power Plants Code Cases," states, in part, "Licensees may apply the ASME Operation and Maintenance Code Cases listed in Regulatory Guide 1.192, Revision 1, without prior NRC approval." Relief Request No. RR 5-2 lists all the applicable ASME OM Code requirements that have test frequency specifications. Please specify if the licensee intends to apply OMN-20 to ASME OM Code Cases that have been found to be acceptable by NRC staff as described in RG 1.192, Revision 1.