

## NRR-PMDAPEm Resource

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**From:** Green, Kimberly  
**Sent:** Thursday, September 10, 2015 2:42 PM  
**To:** ERICKSON, JEFFREY S; jmiska@entergy.com  
**Cc:** Rankin, Jennivine; Collins, Jay; Cumblidge, Stephen; Alley, David; Wolfgang, Robert; Hardies, Robert  
**Subject:** Request for Additional Information Regarding RR 4-22 (MF6448)  
**Attachments:** Final RAI 09-10-15.docx

Mr. Erickson and Mr. Miksa,

By letter dated July 7, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15190A262), as supplemented by letter dated July 31, 2015 (ADAMS Accession No. ML15219A587), Entergy Nuclear Operations, Inc. (the licensee), proposed an alternative to 10 CFR 50.55a(g)(6)(ii)(F)(3) for Palisades Nuclear Plant (Palisades). This regulation defines the inspection requirement for branch connection butt welds at Palisades in accordance with American Society of mechanical Engineers Boiler and Pressure Vessel Code Case N-770-1, "Alternative Examination Requirements and Acceptance Standards for Class 1 PWR [Pressurized Water Reactor] Piping and Vessel Nozzles Butt Welds Fabricated With UNS N06082 or UNS W86182 Weld Filler Material With or Without Application of Listed Mitigation Activities," with U.S. Nuclear Regulatory Commission (NRC) conditions. The licensee is requesting an extension of the required inspection of the Alloy 82/182 branch connections to the primary coolant system for one cycle of operation as presented in Relief Request RR 4-22.

The NRC 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 September 4, 2015, and a clarification call was held on September 10, 2015. A response date of no later than September 18, 2015, is requested. Please let me or Jennie Rankin know if this date cannot be met.

Sincerely,  
Kim Green, Sr. Project Manager  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation  
301-415-1627

**Hearing Identifier:** NRR\_PMDA  
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**Subject:** Request for Additional Information Regarding RR 4-22 (MF6448)  
**Sent Date:** 9/10/2015 2:42:18 PM  
**Received Date:** 9/10/2015 2:42:00 PM  
**From:** Green, Kimberly

**Created By:** Kimberly.Green@nrc.gov

**Recipients:**

"Rankin, Jennivine" <Jennivine.Rankin@nrc.gov>  
Tracking Status: None  
"Collins, Jay" <Jay.Collins@nrc.gov>  
Tracking Status: None  
"Cumblidge, Stephen" <Stephen.Cumblidge@nrc.gov>  
Tracking Status: None  
"Alley, David" <David.Alley@nrc.gov>  
Tracking Status: None  
"Wolfgang, Robert" <Robert.Wolfgang@nrc.gov>  
Tracking Status: None  
"Hardies, Robert" <Robert.Hardies@nrc.gov>  
Tracking Status: None  
"ERICKSON, JEFFREY S" <JERICKS@entergy.com>  
Tracking Status: None  
"jmiska@entergy.com" <jmiska@entergy.com>  
Tracking Status: None

**Post Office:**

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**Options**

**Priority:** Standard  
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**Recipients Received:**

REQUEST FOR ADDITIONAL INFORMATION  
PROPOSED ALTERNATIVE TO 10 CFR 50.55a(g)(6)(ii)(F)(3) REQUIREMENTS FOR  
EXAMINATION OF BRANCH CONNECTION BUTT WELDS  
ENTERGY NUCLEAR OPERATIONS, INC.  
PALISADES NUCLEAR PLANT  
DOCKET NO. 50-255

By letter dated July 7, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15190A262), as supplemented by letter dated July 31, 2015 (ADAMS Accession No. ML15219A587), Entergy Nuclear Operations, Inc. (the licensee), proposed an alternative to 10 CFR 50.55a(g)(6)(ii)(F)(3) for Palisades Nuclear Plant (Palisades). This regulation defines the inspection requirement for branch connection butt welds at Palisades in accordance with American Society of Mechanical Engineer's Boiler and Pressure Vessel Code Case N-770-1, "Alternative Examination Requirements and Acceptance Standards for Class 1 PWR Piping and Vessel Nozzle Butt Welds Fabricated With UNS N06082 or UNS W86182 Weld Filler Material With or Without Application of Listed Mitigation Activities," with NRC conditions. The licensee is requesting an extension of the required inspection of the Alloy 82/182 branch connections to the primary coolant system for one cycle of operation as presented in Relief Request RR 4-22.

The NRC staff has reviewed the information provided and determined that additional information is required in order to complete its review.

**RAI-1**

The NRC staff understands that the branch connection butt weld volumetric examination procedure is qualified to detect and length size flaws in a representative weld. The only barrier to obtaining a full qualification of the procedure and personnel, is that the depth sizing capability of the procedure and inspectors has not met the 0.125 inch RMS error requirements of ASME Code Section XI, Supplement 10. Please provide the following information:

1. Confirm the NRC's understanding of the status of qualification of the branch connection weld volumetric examination procedure.
2. If the NRC's understanding of the above is correct, the Performance Demonstration Initiative (PDI) often provides the inspection personnel with the actual RMS error obtained during the testing for Supplement 10 inspections when an inspector is not able to achieve a 0.125 inch or less RMS depth sizing error. Please provide the RMS error for the depth sizing obtained during PDI testing on the mockups.