

## **NRR-PMDAPEm Resource**

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**From:** Wiebe, Joel  
**Sent:** Thursday, October 06, 2016 9:34 AM  
**To:** Joseph Bauer  
**Subject:** Preliminary RAIs for Braidwood Station Relief Request I3R-17

The purpose of providing preliminary RAIs is to ensure that the RAIs are clear and understandable. If a clarification call is needed, let me know by October 13, 2016. A response to the RAIs is requested within 30 days.

In reviewing the Exelon Generation Company, LLC's (Exelon's) submittal dated July 21, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16203A081), related to request for alternative I3R-17, for the Braidwood Station (Braidwood), Units 1 and 2, the NRC staff has determined that the following information is needed in order to complete its review:

### **RAI-1**

Request for Alternative I3R-17 is based on WCAP-16168, "Risk-Informed Extension of the Reactor Vessel In-Service Inspection Interval" (ADAMS Accession No. ML113060207). The revised safety evaluation (SE) for WCAP-16168 dated July 26, 2011 (ADAMS Accession Number ML111600303), states in required plant-specific information Item 3 that, "The 20-year inspection interval is a maximum interval."

The licensee stated in its July 21, 2016, request for alternative I3R-17, "Upon approval of this relief request, these required [reactor pressure vessel (RPV) weld] examinations would be performed during the Fourth ISI Interval for each Unit in 2027 plus or minus one refueling outage." The licensee also states that, these dates are consistent with those provided in Pressurized Water Reactor Owners Group (PWROG) letter OG-06-356 (ADAMS Accession No. ML082210245) and the latest implementation plan provided in PWROG letter OG-10-238 (ADAMS Accession Number ML11153A033). If this request for an alternative is approved, the third ISI interval will be extended to July 27, 2028 for Unit 1 and October 15, 2028 for Unit 2. As such, the proposed inspection date of 2027, plus or minus one refueling outage, could be within the implementation plan dates but potentially be beyond the requested extended intervals, which would put them beyond the 20 year maximum interval. Confirm that the required RPV inspections will be performed before the approved extension dates of July 27, 2028 for Unit 1 and October 15, 2028 for Unit 2.

### **RAI-2**

The licensee in Tables 3-1 and 3-2 of the July 21, 2016, request for alternative provides information pertaining to RPV inspections for Braidwood, Units 1 and 2. It was stated in both tables that the indications (3 for Unit 1 and 2 for Unit 2) are acceptable per Table IWB-2510-1 of Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code. Also, Table 3-2 listed flaw numbers under "Scaled maximum number of forging flaws" along with the detected number of forging flaws.

- a. Provide the dimensions of the 5 indications mentioned above to allow the staff to confirm that they are acceptable per Table IWB-2510-1.
- b. Provide information on the methodology used to determine the scaled maximum number of forging flaws.

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