

NRR-DMPSPeM Resource

From: Regner, Lisa
Sent: Wednesday, September 12, 2018 1:39 PM
To: Lance Sterling (lsterling@stpegs.com)
Cc: Drew Richards (amrichards@STPEGS.COM)
Subject: Final RAI for South Texas Project RR-ENG-E-16 (L-2018-LLR-0097)

Final Request for Additional Information (L-2018-LLR-0097)

On August 28, 2018, the U.S. Nuclear Regulatory Commission (NRC) staff sent STP Nuclear Operating Company (STPNOC, the licensee) a draft Request for Additional Information (RAI). The RAI relates to a relief request (RR) that proposes an alternate inspection interval for the visual (i.e., VT-3) examinations of Category B-N-2 and B-N-3 welds.

STPNOC informed the NRC staff that a clarification call was needed, and this call was held on September 11, 2018. Subsequently, STPNOC informed the NRC staff that the question was understood and Mr. Lance Sterling agreed to provide a response to this final RAI within 30 days of the date of this email. If STPNOC does not respond by this date, the requested completion date for the RR decision may not be met by the NRC.

The NRC staff also informed the licensee that a publicly available version of this final RAI would be placed in the NRC's Agencywide Documents Access and Management System (ADAMS).

By letter dated June 25, 2018, (ADAMS package Accession No. ML18176A083), the licensee requested relief from the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code for South Texas Project, Units 1 and 2. The NRC staff requires additional information to complete its review of this request as detailed below.

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O9D14

Question 1

By letter dated June 25, 2018 (Agencywide Document Access and Management System (ADAMS) Accession No. ML18176A085), STP Nuclear Operating Company (STPNOC, the licensee) requested relief from the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, to extend the inservice inspection (ISI) interval for Category B-N-2 and B-N-3 examinations for South Texas Project (STP), Unit 1.

Specifically, pursuant to Title 10 of the Code of Federal Regulations (10 CFR) paragraph 50.55a(z)(2), the licensee requested an alternate inspection interval for the visual (i.e., VT-3) examinations of Category B-N-2 and B-N-3, on the basis that complying with the specified requirement would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

In its propose alternative, the licensee did not address whether the RPV core barrel is removed for reasons other than to perform the Category B-N-2 and B-N-3 examinations. If there is an opportunity to perform these examinations due to

removal of the core barrel for other reasons prior to the next scheduled Category B-A and B-D weld examinations, explain why this was not considered since the hardship to remove the core barrel would be eliminated.

Hearing Identifier: NRR_DMPS
Email Number: 563

Mail Envelope Properties (BN6PR09MB1491CE3D014FB9F2EE28131EE51B0)

Subject: Final RAI for South Texas Project RR-ENG-E-16 (L-2018-LLR-0097)
Sent Date: 9/12/2018 1:38:56 PM
Received Date: 9/12/2018 1:38:57 PM
From: Regner, Lisa

Created By: Lisa.Regner@nrc.gov

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Tracking Status: None

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Tracking Status: None

Post Office: BN6PR09MB1491.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	2807	9/12/2018 1:38:57 PM

Options

Priority: Standard

Return Notification: No

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Sensitivity: Normal

Expiration Date:

Recipients Received: