

Exelon BWRVIP/ASME Relief Request Discussion

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Agenda

- Background
- Conflict Between Revised BWRVIP Guidelines and Relief Requests (RR's)
- Examples
- Possible Ideas for Resolution
- Discussion

Background

- All 8 Exelon BWRs have approved NRC Relief Requests to perform BWRVIP inspections in lieu of ASME Section XI B-N-1, B-N-2, and B-N-3 inspections
- The relief requests identify specific BWRVIP inspection guideline revisions
- Exelon relief requests included wording to use later NRC approved versions of BWRVIP guidelines
- Most NRC SERs authorizing the relief requests contain wording that may not allow use of later NRC approved BWRVIP inspection revisions

BWRVIP Relief Request NRC SER Wording - Clinton

- Wording from the March 10, 2016 NRC Safety Evaluation Report for Clinton Power Station, Unit 1:
 - The NRC staff acknowledges that the BWRVIP Executive Committee periodically revises the BWRVIP guidelines to include enhancements in inspection techniques and flaw evaluation methodologies. While the licensee may choose to implement enhancements described in a revised version of the referenced BWRVIP inspection guideline, the licensee is expected to continue to meet the requirements of the version of the BWRVIP inspection guidelines that forms the safety basis for the NRC staff authorized proposed alternative to the requirements of 10 CFR 50.55a.

BWRVIP Relief Request NRC SER Wording - FitzPatrick

- Wording from the May 30, 2018 NRC Safety Evaluation Report for James A. FitzPatrick Nuclear Power Plant:
 - The NRC staff notes that if the licensee intends to take exceptions to, or deviations from, the NRC staff-approved BWRVIP inspection guidelines, this will require the licensee to revise and re-submit this relief request. The licensee shall obtain NRC staff approval for such exceptions prior to implementing the revised inspection guidelines for the FitzPatrick unit's RV interior surfaces, attachments, and core support structures.

Conflict Between Revised BWRVIP Guidelines and RR's

- Recently the NRC approved optimized BWRVIP inspections guidelines for Core Spray and Jet Pumps (BWRVIP-18, Rev. 2 and BWRVIP-41, Rev. 4)
- With the relief request restrictions, Exelon units may not be able to implement the new inspection guidelines without dropping the advantage of the relief request
- Exelon could submit revised relief requests for as many as 8 BWRs units. This creates a significant amount of work for both Exelon and NRC. Thus we are looking for something more efficient
- BWRVIP-94 provides guidelines for utilities to implement revised guidance, but does not address the BWRVIP relief requests
- In the future BWRVIP intends to revise inspection guidelines using NEI 03-08 screening tool

Examples

- BWRVIP-41, Rev. 3 (*BWR Jet Pump Assembly Inspection and Flaw Evaluation Guidelines*) is currently listed in a number of RRs
- The Rev. 4 changes in inspection frequencies have been approved by NRC
- Although in some cases the Rev. 4 inspection frequency is less than the previous revision, the BWRVIP exams remain more comprehensive than that required by ASME Section XI

Possible Ideas for Resolution

- Exelon believes the safety basis of the original relief requests is not impacted by revisions to BWRVIP-18 and 41
- Inspection guideline revisions that screen out most likely will not impact the safety bases
- Options to allow use of BWRVIP revision w/o complete RR revision
 - Possibly an NRC clarification
 - A revised relief request could be a single page revision citing each plant's SER and discussion that the safety basis is not impacted
 - ✓ A supplemental "Proposed Alternative and Basis for Us"

Elements of the Relief Request

- Stations would not implement BWRVIP inspection guidelines that are less conservative until the NRC reviews and approves changes or the guidelines screen out using NEI 03-08 criteria
- Inspection frequencies may change, but any changes will be reviewed against the safety basis presented in Relief Request submittals
- If the safety basis has not changed, new guidelines may be implemented without any revision to relief requests

COMMENTS/QUESTIONS