

NRR-DMPSPeM Resource

From: Vaidya, Bhalchandra
Sent: Tuesday, February 5, 2019 9:21 AM
To: David M.:(GenCo-Nuc; Sprengel, Ryan:(GenCo-Nuc; Steinman, Rebecca L:(GenCo-Nuc)
Subject: LaSalle 1 and 2, EPID-L-2018-LLR-0123, Relief Request I3R-15, THIRD INSERVICE INSPECTION INTERVAL , Request for Additional Information (RAI)

Subject: LaSalle County Station, Units 1 and 2 - Relief Request I3R-15, End of Interval Relief Request Associated with the Third Ten-Year Inservice Inspection (ISI) Interval.

EPID- L-2018-LLA-0123 (CAC NOS. 000976/05000373/ L-2018-LLA-0123, and 000976/05000374/ L-2018-LLA-0123)

Docket Nos. 50-373 and 50-374

David, Ryan, and Rebecca,

By application dated September 19, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18267A058), Exelon Generation Company, LLC (EGC), the licensee requested is requesting relief from the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components." This relief request applies to the third 10-year Inservice Inspection (ISI) interval, which concluded on September 30, 2017, for the LaSalle County Station (LSCS), Units 1 and 2. The third 10-year ISI interval complied with the ASME Boiler and Pressure Vessel Code, Section XI, 2001 Edition with the 2003 Addenda.

The NRC staff has determined that additional information is necessary to complete its review regarding the requested amendment. On January 31, 2019, we transmitted the DRAFT RAIs to you. In your email dated February 1, 2019, you indicated that you do not need a telephone call to clarify the RAIs. This transmittal is for the Final RAIs where there are no changes in the DRAFT RAIs sent to you on January 31, 2019.

The NRC staff's request for Final additional information (RAIs) are provided below:

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REQUEST FOR ADDITIONAL INFORMATION
RELIEF REQUEST I3R-15
THIRD INSERVICE INSPECTION INTERVAL
LASALLE COUNTY STATION, UNITS 1 AND 2
EXELON GENERATION COMPANY, LLC
DOCKET NOS. 50-373 AND 50-374

1.0 INTRODUCTION

By letter dated September 19, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML18267A058), Exelon Generating Company (EGC, the licensee) submitted relief request I3R-15, requesting relief from the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code), Section XI, Rules for Inservice Inspection (ISI) of Nuclear Power Plant Components, for LaSalle County Station (LaSalle) Units 1 and 2. Specifically, pursuant to Title 10 of the Code of Federal Regulations (10 CFR) 50.55a(g)(5)(iii), the licensee requested relief from the "essentially 100 percent" volumetric examination coverage requirements of the ASME Code, Section XI for certain welds on the basis that the code requirement is impractical. The Nuclear Regulatory Commission (NRC) has determined that the following additional information is necessary to complete its review and make a regulatory decision.

MPHB RAI-1

The staff has reviewed the licensee's proposed relief request for Risk-Informed In-service Inspection (RI-ISI) R-A Categories which included stainless steel and carbon steel welds (Main Steam). On page 2 of the submittal dated September 19, 2018, the licensee stated that it is implementing ASME Code Case N-578-1, "Risk-Informed Requirements for Class 1, 2 or 3 Piping, Method B." Table 1 of the ASME Code Case N-578-1, Footnote 3 states: "Includes 100% of the examination location. When the required examination volume or area cannot be examined due to interference by another component or part geometry, limited examinations shall be evaluated for

acceptability. Acceptance of limited examinations or volumes shall not invalidate the results of the risk-informed evaluation. Areas of acceptable limited examinations, and their bases shall be documented.”

(A) The staff requests that the licensee provide inspection results obtained during the third 10-year ISI interval for the following welds under R-A examination category.

(1) Component Identification—IMS-2044-13— (Main Steam), Pipe to Valve weld; Examination Category, R-A; Item Number, R1.20.

(2) Component Identification—IRR-2001-03--- (Recirculation Piping), Header to Sweep-O-Let weld, Examination Category, R-A; Item Number, R1.20.

(3) Component Identification—IRR-2001-04--- (Recirculation Piping), Header to Sweep-O-Let weld, Examination Category, R-A; Item Number, R1.20.

(B) Examinations of the welds listed above with a limited inspection coverage do not provide adequate information on structural integrity of the un-inspected area/volume of the subject welds.

Consistent with the criterion addressed in Note 3 of Table 1 of the Code Case N-578-1, the staff requests that the licensee provide a summary of its engineering evaluation for accepting the examination coverage that is less than essentially 100% for the welds. Provide the results of the previous examination coverage that was obtained for the afore-mentioned welds during the second 10-year ISI interval.

MPHB RAI-2

Consistent with the requirements addressed in Note 2 of Table IWC-2500-1, the staff requests that the licensee provide an explanation for accepting the examination coverage that is much less than essentially 100% for the following weld:

Component Identification—HP-PU2-04—Welded attachment to pump; Examination Category, C-C; Item Number, C3.30; Inspection coverage obtained—16%.

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In a telephone conversation with your Rebecca Steinman, you agreed to provide the responses to these RAIs no later than April 2, 2019.

If you have any questions, please contact me at (301) 415-3308.

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