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To: [Danna, James](#)
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Subject: Memo E-mail to File - Summary of January 22, 2019, Meeting with Dominion to Discuss Proposed Alternative Request, IR-3-39, Fillet Weld Alternative to ASME Code, Section XI
Date: Friday, February 15, 2019 11:08:00 AM

Jim,

For your information, shown below is a summary of the January 22, 2019, Category 1 public meeting with Dominion Energy Nuclear Connecticut, Inc. to discuss the licensee's subject proposed alternative relief request for Millstone Power Station, Unit No. 3. This e-mail will be added to ADAMS as an official agency record and Listserv'd. Please contact me if you have any questions regarding this meeting.

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CATEGORY 1 PUBLIC MEETING WITH
DOMINION ENERGY NUCLEAR CONNECTICUT, INC. (DENC),
TO DISCUSS PROPOSED ALTERNATIVE REQUEST TO ASME CODE SECTION XI,
IWA-4221
MILLSTONE POWER STATION, UNIT NO. 3
PRE-APPLICATION MEETING
MEETING SUMMARY
JANUARY 22, 2019
DOCKET NO. 50-423

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of Dominion Energy Nuclear Connecticut, Inc. (DENC, the licensee) held a public meeting on January 22, 2019, to discuss the licensee's planned IR-3-39 Relief Request submittal regarding a fillet weld alternative from the requirements of the American Society of Mechanical Engineers (ASME) Code, Section XI, Paragraph IWA-4221 for Millstone Unit 3 (MPS3). The licensee's meeting slides are available in Agencywide Documents Access and Management System (ADAMS) at Accession No. ML19022A243. The licensee's presentation is summarized as follows:

Background and Request

The licensee provided an overview of their proposed alternative relief request. Specifically, the licensee requests relief from the ASME Section XI, IWA-4221(c) requirements two fillet welds fabricated during the 'B' Reactor Plant Component Cooling Water (CCP) heat exchanger replacement project in Refueling Outage 17 for MPS3. The request would

permit the two fillet welds, which were made without a 200 degree preheat as required by the code of construction, to remain in-service.

Precedent Request

The proposed alternative request is similar to one submitted by Entergy on August 19, 2013, for River Bend Station, Unit No. 1 (ADAMS Accession No. ML13239A074). This request was approved by the NRC on January 28, 2014 (ADAMS Accession No. ML13353A608). Unlike the River Bend request, the Millstone request does not state that there is hardship associated with meeting the code requirement. River Bend's condition involved ten valves in both trains of service water. Repair or replacement was quantitatively shown to have a measurable increase on risk due to unavailability of associated safety related systems over multiple refueling outages. No such quantitative assessment is currently planned as part of the proposed Millstone alternative request, IR-3-39. Instead, the request will conclude that based on studies and tests, the multi-pass gas tungsten arc-welded fillet welds made without the 200 degree preheat, produce comparable microstructures and hardness (of the weld and heat affected zone) as compared to equivalent code compliant single pass fillet welds with 200 degree preheat.

Evaluation of Production Welds

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An evaluation of the production welds FW-12 and FW-30 was performed. The licensee determined that the outer diameter fillet welds are capable of accommodating all design loads and maintaining structural integrity even without the inner diameter weld in place. Visual and magnetic particle examinations on the production welds were also completed with no recordable indications. Additionally, mock-up testing was performed by the licensee to further support that the existing configuration has an acceptable level of quality. The licensee concluded that the production welds which were made without the 200 degree preheat on the MPS3 'B' CCP heat exchanger have acceptable properties for continued use without repair or replacement.

Schedule

The licensee stated their planned submittal is on track and projected for submission by the end of February 2019.

No decisions were made regarding the acceptability of the licensee's proposed submittal. There were no members of the public in attendance by teleconference. To date, no public meeting feedback forms have been submitted through the NRC public meeting feedback system.

LIST OF ATTENDEES
JANUARY 22, 2019, CATEGORY 1 PUBLIC MEETING WITH
DOMINION ENERGY NUCLEAR CONNECTICUT, INC. (DENC),
TO DISCUSS PROPOSED ALTERNATIVE REQUEST TO ASME CODE SECTION XI,
IWA-4221
MILLSTONE POWER STATION, UNIT NO. 3
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| ATTENDEE | ORGANIZATION |
|------------------|--|
| Robert Davis | U.S. Nuclear Regulatory Commission (NRC) |
| Richard Guzman | NRC |
| Justin Fuller | NRC |
| Joseph Rigatti | DENC |
| David Dodson | DENC |
| Marc Hall | DENC |
| Michael Lalikos | DENC |
| Lori Kelly | DENC |
| Jeff Langan | DENC |
| Craig Sly | DENC |
| Eric Stanistreet | DENC |
| Philip Brant | DENC |
| Shayan Sinha | DENC |