

NRR-DRMAPEm Resource

From: Lingam, Siva
Sent: Thursday, May 30, 2019 1:54 PM
To: Michael.Dilorenzo@aps.com
Cc: Pascarelli, Robert; Alley, David; Hovanec, Christopher; Nove, Carol; Thomas.N.Weber@aps.com; Carl.Stephenson@aps.com
Subject: Palo Verde Nuclear Generating Station, Unit 3 - MVIB Official RAs for RR-63, Impractical Examinations for the Third 10-Year ISI Interval (EPID L-2019-LLR-0002)

By letter dated January 10, 2019 (Agencywide Documents and Access Management System Accession No. ML19010A307), Arizona Public Service Company (APS, the licensee) requested relief from certain requirements of Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), sub-articles IWB-2500 and IWC-2500 for the third ten-year inservice inspection interval at Palo Verde Nuclear Generating Station, Unit 3.

Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Section 50.55a(g)(5)(iii), APS submitted Relief Request (RR) 63 regarding ultrasonic examinations of certain welds that have been determined to be impractical. The licensee requested relief from the ASME Code requirements to achieve essentially 100 percent weld coverage while proposing alternatives.

We transmitted the draft requests for additional information (RAIs) from our Vessels and Internal Branch (MVIB) for the subject RR on May 13, 2019, and at your request, held a clarification call on May 30, 2019. Please find the following **official** RAs for the subject RR, and provide your responses within 30 days from the date of this email, as mutually agreed during the clarification call.

MVIB-RAI-1:

Table 1 states that ultrasonic testing (UT) examinations were not performed on welds 42-100 and 42-101 because the UT equipment could not be calibrated due to "weld materials and configurations." Please describe the efforts taken to calibrate the equipment. Please describe the specific aspects of the weld materials and configurations that prevented the calibration of the UT equipment.

MVIB-RAI-2:

Please describe the preservice examinations (PSE) performed on 42-100 and 42-101 and the results of these examinations. If UT examinations were performed as part of the PSE, describe the unique inservice constraints currently preventing UT from being performed.

MVIB-RAI-3:

Please identify any other steam generators operated by APS with similar blowdown nozzle configurations to 42-100 and 42-101. If UT examinations have been successfully performed on locations comparable to 42-100 and 42-101, please describe the differences that permitted UT examination and examination results.

MVIB-RAI-4:

Please provide a description, assumptions, and results of the "Structural and fatigue analysis of the steam outlet nozzle" (ANSALDO PV-RPM-13-000012, Rev.2).

Siva P. Lingam
U.S. Nuclear Regulatory Commission
Project Manager

Palo Verde Nuclear Generating Station, Units 1, 2, and 3

Grand Gulf Nuclear Station

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