



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 3, 2019

Mr. Paul Fessler
Senior Vice President and
Chief Nuclear Officer
DTE Electric Company
Fermi 2 – 260 TAC
6400 North Dixie Highway
Newport, MI 48166

SUBJECT: FERMIS 2 - PROPOSED ALTERNATIVE TO THE REQUIRED EXAMINATION
ASSOCIATED WITH SNUBBERS (EPID L-2019-LLR-0016)

Dear Mr. Fessler:

By letter dated February 28, 2019, as supplemented by letter dated June 12, 2019, DTE Energy Company (DTE, the licensee) submitted an alternative to the requirements of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), associated with snubber examination at Fermi 2 Power Plant (Fermi 2).

The licensee proposed to use ASME OM Code Case OMN-13, Revision 2 with the 2012 Edition of the OM Code in lieu of the ASME OM Code OMN-13, Revision 2 with the 1995 Edition through 2011 Addenda of the OM Code. Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(z)(1), the licensee requested to use a proposed alternative in request RR-S1 on the basis that the alternative provides an acceptable level of quality and safety.

The U.S. Nuclear Regulatory Commission staff has reviewed DTE's subject request and determined, as set forth in the enclosed safety evaluation, that the the proposed alternative provides an acceptable level of quality and safety for the snubbers. Accordingly, the NRC staff concludes that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(z)(1). All other ASME OM Code Requirements for which relief was not specifically requested and approved remain applicable. Therefore, the NRC staff authorizes the use of the alternative request RR-S1 for Fermi 2 for the fourth 10-year ISI interval snubber (pin-to-pin) program which started on May 2, 2019, and scheduled to end on December 31, 2029.

If you have any questions, please contact the Project Manager, Sujata Goetz at 301-415-8004 or via e-mail at Sujata.Goetz@nrc.gov.

Sincerely,

/RA/

Lisa M. Regner, Acting Branch Chief
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No.: 50-341

Enclosure: Safety Evaluation

cc: Listserv



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NUCLEAR REGULATORY COMMISSION
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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
ALTERNATIVE REQUEST RR-S1 RELATED TO
SNUBBER INSERVICE EXAMINATION & TESTING PROGRAM ALIGNED WITH
FOURTH 10-YEAR INTERVAL INSERVICE INSPECTION PROGRAM
DTE ELECTRIC COMPANY
FERMI 2
DOCKET NO. 50-341

1.0 INTRODUCTION

By letter dated February 28, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19059A254), as supplemented by letter dated June 12, 2019 (ADAMS Accession No. ML19164A025), DTE Electric Company (DTE, the licensee) submitted a request to use an alternative to the requirements of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), associated with snubber examination at Fermi 2 Power Plant (Fermi 2). The proposed alternative request RR-S1, would implement Code Case OMN-13, Revision 2, for extending snubber inservice visual examination interval.

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(z)(1), the licensee requested to use proposed alternative RR-S1 on the basis that the alternative provides an acceptable level of quality and safety.

The Fermi 2 fourth 10-year inservice inspection (ISI) and snubber inservice examination and testing interval started on May 2, 2019, and is scheduled to end on December 31, 2029. In the licensee's June 12, 2019 letter, in response to a request for additional information, DTE stated that snubber (pin-to-pin) inservice examination and testing program will be separate and aligned with Fermi 2 fourth 10-year ISI interval.

2.0 REGULATORY EVALUATION

Regulations in 10 CFR 50.55a(g)(4), "Inservice inspection standards requirements for operating plants," state, in part, that ISI of certain ASME Code Class 1, 2, and 3 components are to be performed in accordance with the specified Section XI of ASME Boiler Pressure Vessel (BPV) Code (or ASME OM Code for snubber examination and testing) and applicable addenda incorporated by reference in the regulations.

Enclosure

Regulations in 10 CFR 50.55a(b)(3)(v)(B), "Snubbers: Second provision," state, in part, that the licensee must comply with the provisions for examination and testing of snubbers in Subsection ISTD of the ASME OM Code when using 2006 Addenda and later editions and addenda of the Section XI of the ASME BPV Code.

Regulations in 10 CFR 50.55a(z), "Alternatives to codes and standards requirements," states that alternatives to the requirements of paragraph (g) of 10 CFR 50.55a may be used, when authorized by the U.S. Nuclear Regulatory Commission (NRC), if the licensee demonstrates: (1) the proposed alternatives provide an acceptable level of quality and safety or (2) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

3.0 TECHNICAL EVALUATION

3.1 Licensee's Alternative Request RR-S1

The licensee requested to use Code Case OMN-13, Revision 2, to extend the examination intervals for all snubbers within the scope of the Fermi 2 snubber program.

Applicable Code

ASME BPV Code edition and addenda for Fermi 2 fourth 10-year ISI interval is the 2013 Edition with no Addenda. The applicable Code for snubber inservice examination and testing is the 2012 Edition of the ASME OM Code with no Addenda.

ISTD-4252, "Subsequent Examination Intervals," (c), states "The duration of examination intervals following the completion of the second refueling outage shall be in accordance with Table ISTD-4252-1."

ISTA-3130, "Application of Code Cases," (b), states, "Code Cases shall be applicable to the edition and addenda specified in the test plan."

ASME OM Code Case OMN-13, Revision 2, "Performance-Based Requirements for Extending Snubber Inservice Visual Examination Interval at LWR [light-water reactor] Power Plants."

Reason for Request

The licensee states, in part:

ISTA-3130(b) states, "Code Cases shall be applicable to the edition and addenda specified in the test plan." ASME has approved Code Case OMN-13, Revision 2. This Code Case is unconditionally approved for use in Regulatory Guide (RG) 1.192, Operation and Maintenance Code Case Acceptability, ASME OM Code, Revision 2. The Fermi 2's Code of Record for the fourth [ISI] interval is the ASME OM Code 2012 Edition. However, Code Case OMN-13, Revision 2, states in the Applicability section that it is applicable to ASME OM Code 1995 Edition through 2011 Addenda. Fermi 2 will be implementing the ASME OM Code 2012 Edition and proposes to also implement Code Case OMN-13, Revision 2, for extending the examination interval for snubbers.

Proposed Alternative

The licensee proposes to use ASME OM Code Case OMN-13, Revision 2, with the 2012 Edition of the ASME OM Code in lieu of the 1995 Edition through 2011 Addenda of the ASME OM Code, as stated in the applicability section of Code Case OMN-13, Revision 2. The proposed alternative will be utilized for the Fermi 2 fourth ISI 10-year interval for snubber inservice examination and testing.

NRC Staff Evaluation

The 2012 Edition of the ASME OM Code, Section ISTD-4252(c), requires duration of snubber examination intervals following the second refueling outage to be in accordance with intervals specified in Table ISTD-4252-1. The snubber visual examination interval can be extended up to 48 months by meeting the requirements as specified in the Table ISTD-4252-1 and its notes. The ASME OM Code Case OMN-13, Revision 2, allows extension of the visual examination interval beyond the interval allowed in Table ISTD-4252-1. ISTA-3130(b) requires Code Cases shall be applicable to the edition and addenda specified in the test plan.

The licensee has proposed to use ASME OM Code Case OMN-13, Revision 2, to extend the visual examination interval beyond the interval allowed by Table ISTD-4252-1 for all snubbers in the ISI program. Specifically, the licensee proposes to apply ASME OM Code Case OMN-13, Revision 2, to the 2012 Edition of the ASME OM Code in lieu of the 1995 Edition through 2011 Edition, to extend the visual inspection frequency of snubbers in the ISI program. Application of ASME OM Code Cases is addressed in 10 CFR 50.55a(b)(6) through reference to Regulatory Guide (RG) 1.192, Revision 2, "Operation and Maintenance Code Case Acceptability, ASME OM Code," which lists acceptable and conditionally acceptable Code Cases. RG 1.192, Revision 2, shows Code Case OMN-13, Revision 2, in Table 1 as acceptable for use without conditions. Code Case OMN-13, Revision 2, was published with the 2012 Edition of the ASME OM Code, and it is applicable to the 1995 Edition through the 2011 Addenda of the ASME OM Code. There is no technical reason for prohibiting the use of the Code Case OMN-13, Revision 2, with the 2012 Edition of the ASME OM Code. The NRC staff has reviewed the 2012 Edition of the ASME OM Code and Code Case OMN-13, Revision 2, and has confirmed that there are no changes in the applicable Code sections referenced within the Code Case OMN-13, Revision 2, so that it remains applicable to the 2012 Edition of the ASME OM Code. Therefore, the NRC staff concludes that the licensee's proposed alternative provides an acceptable level of quality and safety.

4.0 CONCLUSION

As set forth above, the NRC staff determined that the proposed alternative provides an acceptable level of quality and safety for the snubbers. Accordingly, the NRC staff concludes that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(z)(1). All other ASME OM Code requirements for which relief was not specifically requested and approved remain applicable. Therefore, the NRC staff authorizes the use of the alternative request RR-S1 for Fermi 2 for the fourth 10-year ISI interval snubber (pin-to-pin) program which started on May 2, 2019, and scheduled to end on December 31, 2029.

All other ASME OM Code requirements for which relief was not specifically requested and approved remain applicable.

Principal Contributor: Gurjendra S. Bedi, NRR/DE/EMIB

Date: October 3, 2019

SUBJECT: FERM2 - PROPOSED ALTERNATIVE TO THE REQUIRED EXAMINATION
ASSOCIATED WITH SNUBBERS (EPID L-2019-LLR-0016) DATED
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