From:	Galvin, Dennis
Sent:	Friday, April 17, 2020 3:38 PM
To:	Drew Richards (amrichards@stpegs.com)
Cc:	Nic Boehmisch (nboehmisch@stpegs.com)
Subject:	South Texas Project – Request for Additional Information - Proposed Alternative to ASME OM Code 2012 Edition – Relief Request PRR-01 (EPID: L 2020-LLR-0007)
Attachments:	STP RR PRR-01 OMN-18 Final RAI 2020-04-17.pdf

Mr. Richards,

By letter dated January 22, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML20022A318), STP Nuclear Operating Company (the licensee) requested Nuclear Regulatory Commission (NRC) approval of a proposed alternative to American Society Of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM CODE) 2012 Edition for the Fourth Inservice Test Interval (Relief Request PRR-01) in accordance with 10 CFR 50.55a(z)(1). The proposed alternative is to use ASME OM Code Case OMN-18, “Alternate Testing Requirements for Pumps Tested Quarterly Within ± 20% of Design Flow.”

The NRC staff has determined that additional information is needed to complete its review. The requests for additional information (RAIs) were transmitted to the licensee in draft form on April 15, 2020. On April 16, 2020, the licensee indicated that a RAI clarification call was not needed and that it could provide responses to the RAIs by May 18, 2020. The NRC staff agreed with this date.

If you have any questions, please contact me at (301) 415-6256 or Dennis.Galvin@nrc.gov.

Respectfully,

Dennis Galvin
Project Manager
U.S Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of Operating Reactor Licensing
Licensing Project Branch 4
301-415-6256

Docket No. 50-498, 50-499

Hearing Identifier: NRR_DRMA
Email Number: 536

Mail Envelope Properties (MN2PR09MB52738145D5398BF1EB6CB215FBD90)

Subject: South Texas Project – Request for Additional Information - Proposed Alternative to ASME OM Code 2012 Edition – Relief Request PRR-01 (EPID: L 2020-LLR-0007)
Sent Date: 4/17/2020 3:37:43 PM
Received Date: 4/17/2020 3:37:00 PM
From: Galvin, Dennis

Created By: Dennis.Galvin@nrc.gov

Recipients:
"Nic Boehmisch (nboehmisch@stpegs.com)" <nboehmisch@stpegs.com>
Tracking Status: None
"Drew Richards (amrichards@stpegs.com)" <amrichards@stpegs.com>
Tracking Status: None

Post Office: MN2PR09MB5273.namprd09.prod.outlook.com

Files	**Size**	**Date & Time**
MESSAGE	1396	4/17/2020 3:37:00 PM
STP RR PRR-01 OMN-18 Final RAI 2020-04-17.pdf	105022	

Options
Priority: Normal
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:

REQUEST FOR ADDITIONAL INFORMATION

PROPOSED ALTERNATIVE REQUEST PRR-01 FOR FOURTH 10-YEAR INTERVAL

INSERVICE TESTING PROGRAM

STP NUCLEAR OPERATING COMPANY

SOUTH TEXAS PROJECT UNITS 1 AND 2

DOCKET NOS. 50-498 AND 50-499

By letter dated January 22, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML20022A318), STP Nuclear Operating Company (the licensee) requested Nuclear Regulatory Commission (NRC) approval of a proposed alternative to American Society Of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM CODE) 2012 Edition for the Fourth Inservice Test Interval (Relief Request PRR-01) in accordance with 10 CFR 50.55a(z)(1).

Paragraph (f), "Preservice and inservice testing requirements," of Section 55a, "Codes and standards," in Part 50, "Domestic Licensing of Production and Utilization Facilities," to Title 10, "Energy," of the *Code of Federal Regulations* (10 CFR 50.55a(f)), states, in part, that throughout the service life of a boiling or pressurized water-cooled nuclear power facility, pumps and valves that are within the scope of the ASME OM Code must meet the inservice test requirements (except design and access provisions) set forth in the ASME OM Code and addenda that become effective subsequent to editions and addenda specified in 10 CFR 50.55a(f)(2) and (3) and that are incorporated by reference in 10 CFR 50.55a(a)(1)(iv), to the extent practical within the limitations of design, geometry, and materials of construction of the components.

To complete its review, the NRC staff requests the following additional information.

RAI PRR-01-1

Request PRR-01 proposes to use ASME OM Code Case OMN-18, "Alternate Testing Requirements for Pumps Tested Quarterly Within ± 20% of Design Flow." This Code Case states that a Group A test may be performed quarterly within ± 20 percent of pump design flow rate, with instrumentation meeting the requirements for the comprehensive and preservice tests, and no comprehensive test is required. The 2012 Edition of the ASME OM Code, which is the Code of Record for the fourth 10-year interval inservice testing program, does not use the term "design flow." The term used is "comprehensive pump test flow rate."

ASME OM Code, Subsection ISTB, paragraph ISTB-3300(e)(1) states that reference values shall be established at the comprehensive pump test flow rate for the comprehensive test. Paragraph ISTB-3300(e)(2) states that reference values shall be established at the comprehensive pump test flow rate for the Group A and Group B tests, if practicable. If not practicable, the reference point flow rate shall be established at the highest practical flow rate.

Please state for each pump listed in Request PRR-01 if the flow rate for the modified quarterly test will be the comprehensive pump test flow rate or the highest practical flow rate.