



MAR 23 2018

Serial: BSEP 18-0040

10 CFR 50.55a(z)(1)

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: Brunswick Steam Electric Plant, Unit No. 2
Renewed Facility Operating License No. DPR-62
Docket No. 50-324
Proposed Alternative In Accordance With 10 CFR 50.55a(z)(1) for End of Interval
Leakage Test

Ladies and Gentlemen:

In accordance with 10 CFR 50.55a(z)(1), Duke Energy Progress, LLC (Duke Energy), hereby requests approval of an alternative to the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, 2001 Edition through 2003 Addenda for the Brunswick Steam Electric Plant (BSEP), Unit No. 2.

The ASME Code, Section XI, paragraph IWB-5222(b), requires that the pressure retaining boundary system leakage test, conducted at or near the end of each inspection interval, be extended to all Class 1 pressure retaining components within the system boundary. The enclosed relief request is to allow the required Unit 2, fourth 10-year, end of interval leakage testing on portions of the Core Spray, High Pressure Coolant Injection, and Standby Liquid Control Systems to be completed no later than the end of refueling outage B2R24 (i.e., currently scheduled for March 2019). Approval of the proposed alternative is requested prior to the end of the fourth 10-year ISI interval, which is currently scheduled to end on May 10, 2018.

Please refer any questions regarding this submittal to Mr. Lee Grzeck, Manager – Regulatory Affairs, at (910) 832-2487.

Sincerely,

Bryan B. Wooten
Director – Organizational Effectiveness
Brunswick Steam Electric Plant

MAT/mat

Enclosure: 10 CFR 50.55a Request Number ISI-11

cc (with enclosure):

U.S. Nuclear Regulatory Commission, Region II
ATTN: Ms. Catherine Haney, Regional Administrator
245 Peachtree Center Ave, NE, Suite 1200
Atlanta, GA 30303-1257

U.S. Nuclear Regulatory Commission
ATTN: Mr. Gale Smith, NRC Senior Resident Inspector
8470 River Road
Southport, NC 28461-8869

U.S. Nuclear Regulatory Commission
ATTN: Mr. Andrew Hon (Mail Stop OWFN 8G9A)
11555 Rockville Pike
Rockville, MD 20852-2738

Chair - North Carolina Utilities Commission **(Electronic Copy Only)**
4325 Mail Service Center
Raleigh, NC 27699-4300
swatson@ncuc.net

Mr. Cliff Dautrich, Bureau Chief
North Carolina Department of Labor
Boiler Safety Bureau
1101 Mail Service Center
Raleigh, NC 27699-1101

10 CFR 50.55a Request Number ISI-11

Proposed Alternative in Accordance with 10 CFR 50.55a(z)(1)

Unit 2 End of Fourth Interval Leakage Test

1. **ASME Code Components Affected**

Unit(s) Affected: Brunswick Steam Electric Plant (BSEP), Unit 2
Code Class: ASME Code, Section XI, Class 1
References: Subarticle IWB-5222(b)
Examination Categories: B-P
Item Number: 15.10, Pressure Retaining Components
Component Numbers: Piping between 2-E21-F006A and 2-E21-F005A
Piping between 2-E21-F006B and 2-E21-F005B
Piping between 2-E41-V159 and 2-E41-F006
Piping between 2-C41-F007 and 2-C41-F006
Description: Pressure Testing

2. **Applicable Code Edition**

The Inservice Inspection Program for the fourth 10-year inservice inspection (ISI) interval is based on the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, 2001 Edition with 2003 Addenda. The fourth 10-year ISI interval began on May 11, 2008, and is currently scheduled to end on May 10, 2018.

3. **Applicable Code Requirement**

The ASME Code, Section XI, paragraph IWB-5222(b) requires the pressure retaining boundary during the system leakage test extend to all Class 1 components within the system boundary.

4. **Reason for Request**

An End of Interval Leakage Test (EOILT) is required during the fourth 10-year ISI interval to satisfy the requirement of ASME Section XI paragraph IWB-5222(b), which states:

The pressure retaining boundary during the system leakage test conducted at or near the end of each inspection interval shall extend to all Class 1 pressure retaining components within the system boundary.

During the B2R23 refueling outage in 2017 and B2R22 refueling outage in 2015, the EOILT was not performed during the Reactor Pressure Vessel (RPV) pressure test.

5. **Proposed Alternative and Basis for Use**

In accordance with 10 CFR 50.55a(z)(1), the proposed alternative is to allow the required Unit 2, fourth 10-year, EOILT to be completed no later than the end of refueling outage B2R24 (i.e., currently scheduled for March 2019) during the Reactor Pressure Vessel Pressure Test. This test would include the piping which meets the criteria of IWB-5222(b) which is not exempted per ASME Code Case N-798, *Alternative Pressure Testing Requirements for Class 1 Piping Between the First and Second Vent, Drain, and Test Isolation Devices, Section XI, Division 1*, (i.e., Reference 1) and existing approved BSEP relief request RR-38 for BSEP's fourth interval (i.e., Reference 2). The portions of piping that will be included in the test are listed below.

Referenced Boundary Sketches, with valve and line information, are provided at the end of this enclosure.

Line Function	First Isolation Valve	Affected Line	Line Size	Second Isolation Valve
Core Spray (CS) Injection (A Loop)	2-E21-F006A	2-E21-3-10-600	10"	2-E21-F005A
CS Injection (B Loop)	2-E21-F006B	2-E21-7-10-600	10"	2-E21-F005B
High Pressure Coolant Injection (HPCI) Injection	2-E41-V159	2-E41-3-14-901	14"	2-E41-F006
Standby Liquid Control (SLC) Injection	2-C41-F007	2-C41-9-1 1/2-902	1.5"	2-C41-F006

The EOILT will be performed in the same manner as the regular 10-year test in accordance with the approved RPV pressure test procedure. The portions of piping that meet the IWB-5222(b) criteria and are not exempted by a code case will be pressurized to the RPV test pressure range of 1030 psig to 1070 psig. The test will be conducted using temporary hose connections to bypass the injection check valves of the CS, HPCI, and SLC systems. The remainder of piping that meets the criteria of IWB-5222(b) will be exempt per NRC approved code case N-798.

The pressure test will be evaluated by qualified VT-2 examiners completing visual examinations of the test boundaries in accordance with the approved RPV pressure test procedure.

Approval of the proposed alternative is requested prior to the end of the fourth 10-year ISI interval, which is currently scheduled to end on May 10, 2018.

Basis for Use

BSEP is requesting an extension of the EOILT to be performed in the Unit 2 outage in 2019 (i.e., B2R24) for fourth interval credit. The request would not alter the May 11, 2018 start date for the fifth Interval and subsequent ISI intervals. With the approval, the EOILT would be performed twice during the fifth ISI interval, once during the first outage of the fifth interval for credit to the fourth interval and once at or near the end of the fifth Interval for credit to the fifth interval.

The most recent performance of the EOILT on Unit 2 was April 8, 2007. This test included the Class 1 injection lines for CS, HPCI, and SLC systems. The additional portion of Class 1 piping (i.e., vents, drains, and test lines) included in the IWB-5222(b) criteria was bounded by Relief Request RR-38 (i.e., Reference 2) and was not tested during the 2007 test, but was visually examined.

The subject piping is not susceptible to thermal fatigue due to the piping being upstream of the first isolation valve from the reactor vessel. Additionally, there are no known degradation

mechanisms in each of the subject line systems which would cause degradation of the piping that would impact the structural integrity of the piping or piping welds.

The EOILT was last performed in 2007, however additional testing has been performed on the applicable portions of piping during each Unit 2 refueling outage since 2007. The testing of applicable portions of piping provides a reasonable level of assurance that the integrity of the piping is adequate to support performance of the EOILT during the next Unit 2 outage.

Operational and Pressure Testing

The following table provides a summary of Operational, ASME Section XI, or Appendix J Local Leak Rate Testing that has been completed on the subject piping since the last performance of the EOILT in 2007.

Line Function	Test	Boundary	Test Pressure	Year
Reactor Pressure Vessel and Class 1 Piping	OPT-80.1 (RPV Pressure Test) (Code Case N-498, Reference 3)	RPV and Class 1 Piping	1033 -1052.9 psig	2007
CS Injection (A Loop)	OPT-07.1.1A (CS Injection Check Valve Operability Test)	Includes 2-E21-F006A to 2-E21-F005A	371 psig	2007
CS Injection (A Loop)	OPT-07.1.1A (CS Injection Check Valve Operability Test)	Includes 2-E21-F006A to 2-E21-F005A	369 psig	2009
CS Injection (A Loop)	OPT-07.1.1A (CS Injection Check Valve Operability Test)	Includes 2-E21-F006A to 2-E21-F005A	383 psig	2011
CS Injection (A Loop)	OPT-07.1.1A (CS Injection Check Valve Operability Test)	Includes 2-E21-F006A to 2-E21-F005A	376 psig	2013
CS Injection (A Loop)	OPT-07.1.1A (CS Injection Check Valve Operability Test)	Includes 2-E21-F006A to 2-E21-F005A	377 psig	2015
CS Injection (A Loop)	OPT-07.1.1A (CS Injection Check Valve Operability Test)	Includes 2-E21-F006A to 2-E21-F005A	355 psig	2017
CS Injection (A Loop)	OPT-20.7B (PIV LRT) in conjunction with OPT-80.1 RPV Pressure Test	Includes 2-E21-F006A to 2-E21-F005A	No Measured Pressure. Leakage measured past F006A.	2007

Line Function	Test	Boundary	Test Pressure	Year
CS Injection (A Loop)	OPT-20.7B (PIV LRT) in conjunction with OPT-80.1 RPV Pressure Test	Includes 2-E21-F006A to 2-E21-F005A	No Measured Pressure. Leakage measured past F006A.	2009
CS Injection (A Loop)	OPT-20.7B (PIV LRT) in conjunction with OPT-80.1 RPV Pressure Test	Includes 2-E21-F006A to 2-E21-F005A	No Measured Pressure. Leakage measured past F006A.	2011
CS Injection (A Loop)	OPT-20.7B (PIV LRT) in conjunction with OPT-80.1 RPV Pressure Test	Includes 2-E21-F006A to 2-E21-F005A	No Measured Pressure. Leakage measured past F006A.	2013
CS Injection (A Loop)	OPT-20.7B (PIV LRT) in conjunction with OPT-80.1 RPV Pressure Test	Includes 2-E21-F006A to 2-E21-F005A	No Measured Pressure. Leakage measured past F006A.	2015
CS Injection (A Loop)	OPT-20.7B (PIV LRT) in conjunction with OPT-80.1 RPV Pressure Test	Includes 2-E21-F006A to 2-E21-F005A	No Measured Pressure. Leakage measured past F006A.	2017
CS Injection (B Loop)	OPT-07.1.1B (CS Injection Check Valve Operability Test)	Includes 2-E21-F006B to 2-E21-F005B	402 psig	2007
CS Injection (B Loop)	OPT-07.1.1B (CS Injection Check Valve Operability Test)	Includes 2-E21-F006B to 2-E21-F005B	391 psig	2009
CS Injection (B Loop)	OPT-07.1.1B (CS Injection Check Valve Operability Test)	Includes 2-E21-F006B to 2-E21-F005B	399 psig	2011
CS Injection (B Loop)	OPT-07.1.1B (CS Injection Check Valve Operability Test)	Includes 2-E21-F006B to 2-E21-F005B	386 psig	2013
CS Injection (B Loop)	OPT-07.1.1B (CS Injection Check Valve Operability Test)	Includes 2-E21-F006B to 2-E21-F005B	388 psig	2015

Line Function	Test	Boundary	Test Pressure	Year
CS Injection (B Loop)	OPT-07.1.1B (CS Injection Check Valve Operability Test)	Includes 2-E21-F006B to 2-E21-F005B	387 psig	2017
CS Injection (B Loop)	OPT-20.7B (PIV LRT) in conjunction with OPT-80.1 RPV Pressure Test	Includes 2-E21-F006B to 2-E21-F005B	No Measured Pressure. Leakage measured past F006B.	2007
CS Injection (B Loop)	OPT-20.7B (PIV LRT) in conjunction with OPT-80.1 RPV Pressure Test	Includes 2-E21-F006B to 2-E21-F005B	No Measured Pressure. Leakage measured past F006B.	2009
CS Injection (B Loop)	OPT-20.7B (PIV LRT) in conjunction with OPT-80.1 RPV Pressure Test	Includes 2-E21-F006B to 2-E21-F005B	No Measured Pressure. Leakage measured past F006B.	2011
CS Injection (B Loop)	OPT-20.7B (PIV LRT) in conjunction with OPT-80.1 RPV Pressure Test	Includes 2-E21-F006B to 2-E21-F005B	No Measured Pressure. Leakage measured past F006B.	2013
CS Injection (B Loop)	OPT-20.7B (PIV LRT) in conjunction with OPT-80.1 RPV Pressure Test	Includes 2-E21-F006B to 2-E21-F005B	No Measured Pressure. Leakage measured past F006B.	2015
CS Injection (B Loop)	OPT-20.7B (PIV LRT) in conjunction with OPT-80.1 RPV Pressure Test	Includes 2-E21-F006B to 2-E21-F005B	No Measured Pressure. Leakage measured past F006B.	2017
HPCI Injection	OPT-20.3-B21 (App. J LLRT)	Includes 2-E41-F006 to 2-E41-V159	50 psig	2007
HPCI Injection	OPT-20.3-B21 (App. J LLRT)	Includes 2-E41-F006 to 2-E41-V159	50 psig	2009
HPCI Injection	OPT-20.3-B21 (App. J LLRT)	Includes 2-E41-F006 to 2-E41-V159	50 psig	2011
HPCI Injection	OPT-20.3-B21 (App. J LLRT)	Includes 2-E41-F006 to 2-E41-V159	50 psig	2013

Line Function	Test	Boundary	Test Pressure	Year
HPCI Injection	OPT-20.3-B21 (App. J LLRT)	Includes 2-E41- F006 to 2-E41- V159	50 psig	2015
HPCI Injection	OPT-20.3-B21 (App. J LLRT)	Includes 2-E41- F006 to 2-E41- V159	50 psig	2017
SLC Injection	OPT-20.14 (ASME Section XI PT)	Includes 2-C41- F006 to 2-C41- V5003	49.5 psig	2007
SLC Injection	OPT-20.14 (ASME Section XI PT)	Includes 2-C41- F006 to 2-C41- V5003	88.2 psig	2009 (Note 1)
SLC Injection	OPT-20.14 (ASME Section XI PT)	Includes 2-C41- F006 to 2-C41- V5003	90.5 psig	2009 (2 nd Occurrence) (Note 1)
SLC Injection	OPT-20.14 (ASME Section XI PT)	Includes 2-C41- F006 to 2-C41- V5003	91.5 psig	2011 (Note 1)
SLC Injection	OPT-20.14 (ASME Section XI PT)	Includes 2-C41- F006 to 2-C41- V5003	92 psig	2013 (Note 1)
SLC Injection	OPT-20.14 (ASME Section XI PT)	Includes 2-C41- F006 to 2-C41- V5003	93 psig	2015 (Note 1)
SLC Injection	OPT-20.14 (ASME Section XI PT)	Includes 2-C41- F006 to 2-C41- V5003	93.5 psig	2017 (Note 1)

Note 1 Indicates years that demineralized water was injected through the 1-C41-F007 Check Valve into the vessel however this portion of the test was not in the pressure boundary for the VT-2 Examination.

Non Destructive Examinations

There have been no non-destructive examinations completed on the piping addressed in this relief request.

6. Duration of the Proposed Alternative

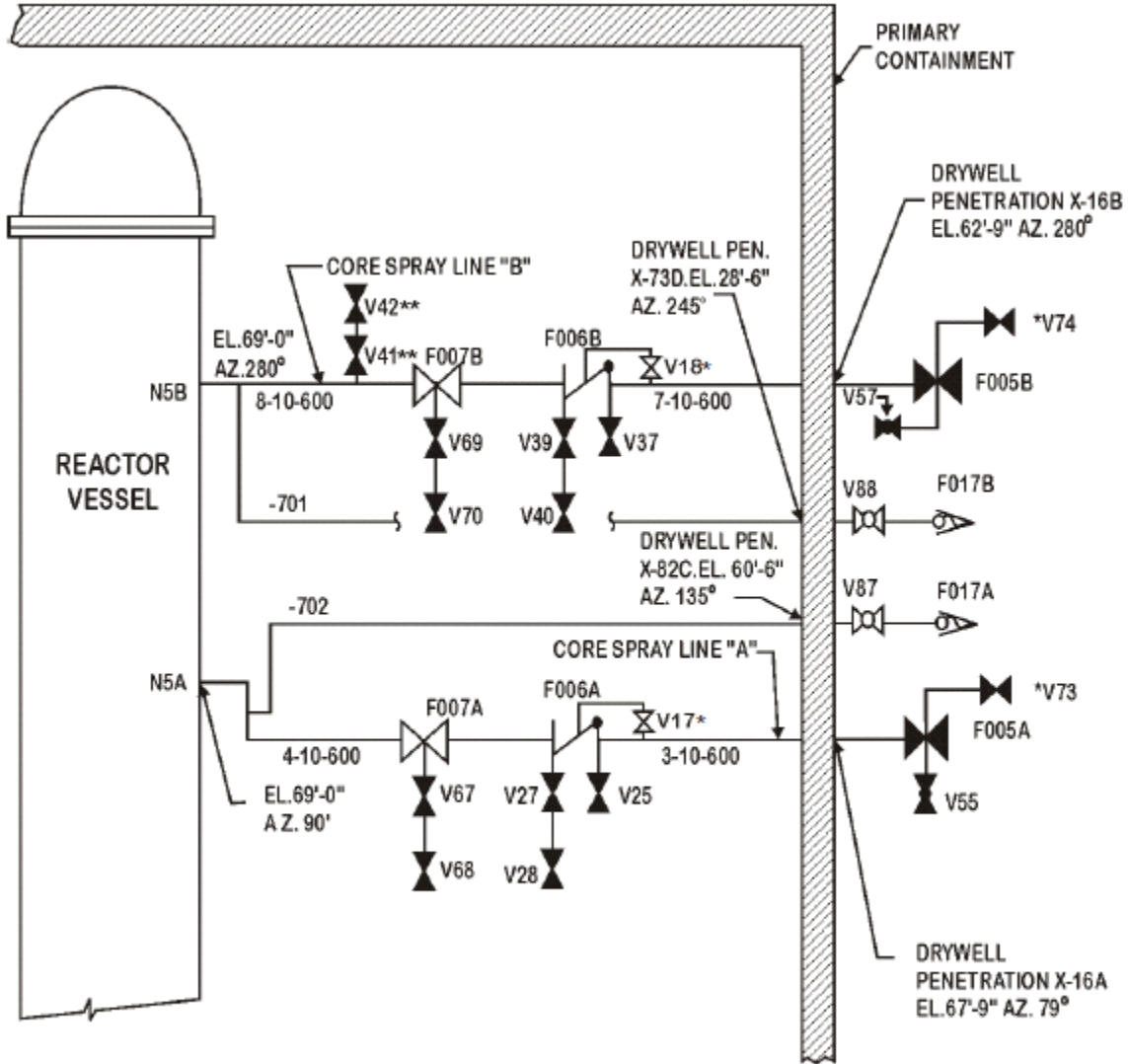
This proposed alternative is requested until the end of the refueling outage B2R24, currently scheduled for March 2019.

7. References

1. ASME Code Case N-798, *Alternative Pressure Testing Requirements for Class 1 Piping Between the First and Second Vent, Drain, and Test Isolation Devices, Section XI, Division 1*

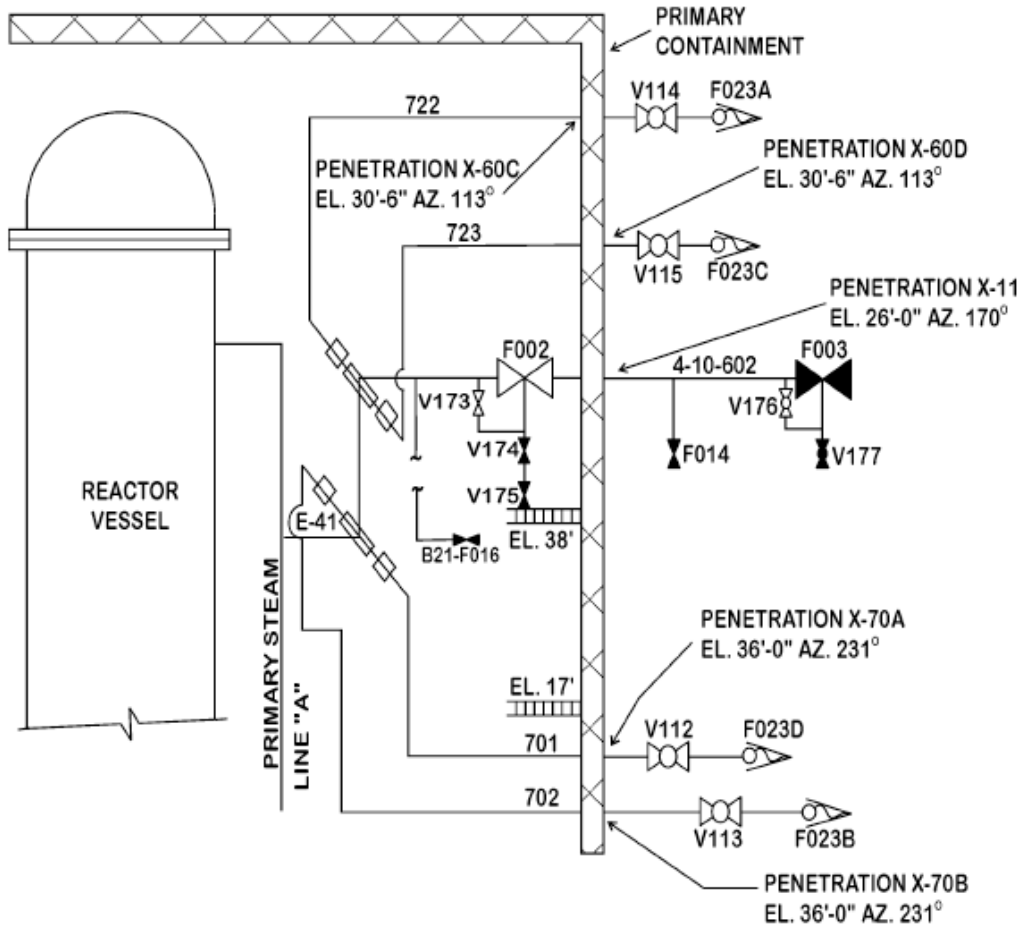
2. Letter from Brenda Mozafari (NRC) to James Scarola (Carolina Power & Light Company), *Request for Relief No. RR-38 Regarding Pressure Testing of Drain, Vent, Test, and Fill Lines Within the Reactor Coolant Pressure Boundary*. ADAMS Accession No. ML070360418
3. ASME Code Case N-498, *Alternative Requirements for 10-Year System Hydrostatic Testing of Class 1, 2, and 3 Systems*

**OPT-80.1, Reactor Pressure Vessel ASME Section XI Pressure Test
 VT-2 Examination Boundary Drawing
 Core Spray A and B Loops Boundary**

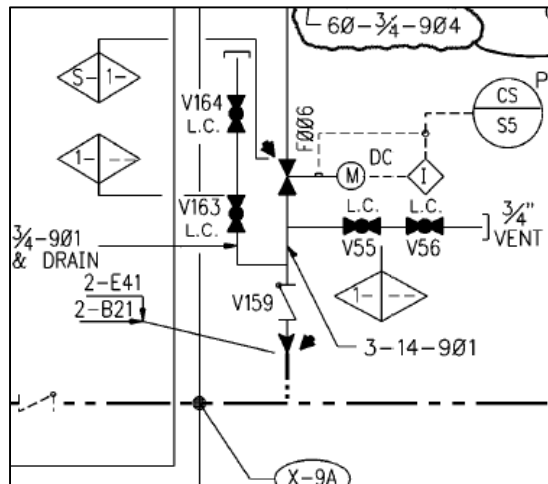


*Unit 1 only
 ** Unit 2 only

**OPT-80.1, Reactor Pressure Vessel ASME Section XI Pressure Test
 VT-2 Examination Boundary Drawing
 High Pressure Coolant Injection Steam Line**



HPCI Injection 2-E41-F006 to 2-E41-V159



**OPT-80.1, Reactor Pressure Vessel ASME Section XI Pressure Test
VT-2 Examination Boundary Drawing
Standby Liquid Control**

