

## **NRR-DMPSPEm Resource**

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**From:** Orenak, Michael  
**Sent:** Wednesday, August 15, 2018 1:07 PM  
**To:** Matthew.Cox@aps.com  
**Cc:** Carl.Stephenson@aps.com; Pascarelli, Robert  
**Subject:** RR-58 RAIs  
**Attachments:** RAIs for RR-58.docx

Matthew,

By letter dated March 17, 2018, Arizona Public Service Company (APS) requested relief from certain requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI. This relief request, RR-58, pertains to examination ultrasonic examinations of welds that have been determined to be impractical during the third inservice inspection interval at the Palo Verde Nuclear Generating Station, Units 1, 2, and 3.

The U.S. Nuclear Regulatory Commission staff reviewed the submittal and determined that the additional information in the attachment is needed to complete its review. During a call on August 15, 2018, Mr. Stephenson agreed that APS would respond within 30 days of the date of this email.

Please contact me if you have any questions.

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**Hearing Identifier:** NRR\_DMPS  
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**Mail Envelope Properties** (Michael.Orenak@nrc.gov20180815130600)

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**Sent Date:** 8/15/2018 1:06:32 PM  
**Received Date:** 8/15/2018 1:06:00 PM  
**From:** Orenak, Michael

**Created By:** Michael.Orenak@nrc.gov

**Recipients:**

"Carl.Stephenson@aps.com" <Carl.Stephenson@aps.com>  
Tracking Status: None  
"Pascarelli, Robert" <Robert.Pascarelli@nrc.gov>  
Tracking Status: None  
"Matthew.Cox@aps.com" <Matthew.Cox@aps.com>  
Tracking Status: None

**Post Office:**

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**Options**

**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
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**Recipients Received:**

REQUEST FOR ADDITIONAL INFORMATION  
RELIEF REQUEST 58: IMPRACTICAL EXAMINATIONS FOR THE  
THIRD 10-YEAR INSERVICE INSPECTION INTERVAL  
ARIZONA PUBLIC SERVICE COMPANY  
PALO VERDE NUCLEAR GENERATION STATION, UNIT 2  
DOCKET NO. 50-529

By letter dated March 17, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18079A725), Arizona Public Service Company (APS, the licensee), submitted relief request (RR) No. 58 to request relief from the requirements in Subarticles IWB-2500 and IWC-2500 of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," 2001 Edition through 2003 Addenda, regarding examinations of certain welds at Palo Verde Nuclear Generating Station, Unit 2 (Palo Verde 2).

The U.S. Nuclear Regulatory Commission staff is reviewing the submittal and the following additional information is needed to complete the review:

1. The code of record for the third 10-year inservice inspection (ISI) interval is the 2001 Edition of ASME BPV Code, Section XI, through the 2003 Addenda. For the Appendix VIII program at Palo Verde 2, please provide the applicable ASME BPV Code, Section XI, Edition and Addenda.
2. APS states that compliance with the ASME BPV Code requirement of achieving essentially 100 percent coverage of the welds listed is impractical. Please state if the Palo Verde 2 ISI program utilizes ASME Code Case N-460, "Alternative Examination Coverage for Class 1 and Class 2 Welds Section XI, Division 1"
3. The Category C-F-1 piping welds are located in zones 091 and 103. Please describe the location of these zones, focusing on operational leakage monitoring and assessment of radiation dose impacts.
4. Please describe the materials of construction (ASTM/ASME material specifications) and geometry (e.g. pipe diameter, wall thickness, etc.) of the piping and components associated with the Category C-F-1 piping welds discussed in the submittal.
5. Please describe the design/operating conditions (e.g. temperature, pressure, etc.) of with the Category C-F-1 piping welds discussed in the submittal.
6. Please confirm that the C-F-1 piping welds discussed in the submittal are not included in any augmented inspection program (e.g., MRP-146, and/or the Electric Power Research Institute (EPRI) interim guidance MRP 2015-025 "EPRI-MRP Interim Guidance for Management of Thermal Fatigue" (ADAMS Accession No. ML15189A100)). If these piping welds are part of an augmented program, please describe the program.

7. Please state if the Category C-F-1 piping welds discussed in the submittal were examined in the first or second 10-year (previous) ISI intervals. If so, please discuss the results of the inspections.