

NRR-DMPSPeM Resource

From: Lingam, Siva
Sent: Wednesday, February 13, 2019 1:33 PM
To: Matthew.Cox@aps.com
Cc: Pascarelli, Robert; Cumblidge, Stephen; Davis, Robert; Thomas.N.Weber@aps.com; Michael.Dilorenzo@aps.com; Carl.Stephenson@aps.com
Subject: Palo Verde1, 2, and 3 - Official Requests for Additional Information for RR 62, Third and Fourth 10-Year ISI Intervals, Proposed Alternative - Pressurizer Heat Sleeve Repairs (EPID L-2018-LLR-0120)

By letter dated August 31, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18243A544), Arizona Public Service Company (the licensee) submitted Relief Request (RR) No. 62 to the U. S. Nuclear Regulatory Commission (NRC), requesting an alternative to certain American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, requirements at Palo Verde Nuclear Generating Station (PVNGS), Units 1, 2, and 3.

Specifically, the licensee wants NRC approval to allow flaws to remain in place on repaired pressurizer heater sleeve remnant nozzles and welds and to forgo successive examinations required by ASME Code, Section XI.

We transmitted the draft requests for additional information (RAIs) from our Piping and Head Penetrations Branch (MPHB) for the subject RR on January 31, 2019, and at your request, held a clarification call on February 13, 2019. Please find the following **official** RAIs for the subject RR, and provide your responses by March 15, 2019, as mutually agreed during the clarification call.

MPHB-RAI-1

The licensee requested the proposed alternative at PVNGS, Units 1, 2, and 3 for the third and fourth 10-year inservice inspection (ISI) intervals. However, Units 2 and 3 are currently in the fourth 10-year ISI interval and Unit 1 will begin the fourth 10-year ISI interval on June 1, 2019. The licensee has requested its proposed alternative in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Section 50.55a(z)(1). However, Section 10 CFR 50.55a(z) states, in part, "A proposed alternative must be submitted and authorized prior to implementation." Therefore, the NRC staff would be unable to approve a proposed alternative, in accordance with 10 CFR 50.55a(z), for the third interval at Units 2 and 3, and all but the remainder of the third interval for Unit 1. The NRC staff requests that the licensee modify the proposed alternative to be consistent with 10 CFR 50.55a(z).

MPHB-RAI-2

The licensee requested a similar alternative, RR 29, during the second 10-year ISI interval at PVNGS Units 1, 2, and 3. In support of that proposed alternative, the licensee provided Report No. SIR-04-045, Revision 0, "Technical Report Supporting the Palo Verde Pressurizer Heater Sleeve Mid-Wall Repair," June 2004 (ADAMS Accession No. ML042450045). The current proposed alternative references this document to support RR 62. The applicable Code for the second 10-year ISI interval at PVNGS, Units 1, 2 and 3 was the 1992 Edition through the 1992 Addenda of ASME Code Section XI. The applicable Code for the fourth 10-year ISI interval is the 2013 Edition of ASME Code Section XI. Please clarify whether a reconciliation has been performed between these two Editions/Addenda of ASME Code, Section XI, and that any differences between them do not impact the analysis detailed in the above listed Report No. SIR-04-045 in support of RR 62.

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

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