

APR 23 2019

Docket Nos.: 50-348
50-364

NL-19-0343

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555-0001Joseph M. Farley Nuclear Plant – Unit 1 and 2
Relief Request FNP-ISI-RR-03
SNC Response to NRC Request for Additional Information

Ladies and Gentlemen:

By letter dated November 30, 2018 (Agency wide Documents Access and Management System Accession Number ML18334A032), Southern Nuclear Operating Company (SNC) requested relief from certain requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI. This relief request, FNP-ISI-RR-03, proposed an alternate examination coverage of certain welds during the fourth 10-year inservice inspection program interval for Farley Nuclear Plant Units 1 and 2.

By email dated March 7, 2019, the U.S. Nuclear Regulatory Commission (NRC) staff notified SNC that additional information is needed for the staff to complete their review. Enclosure 1 to this letter provides the SNC response to the NRC request for additional information (RAI).

This letter contains no NRC commitments. If you have any questions, please contact Jamie Coleman at 205.992.6611.

Respectfully submitted,


Cheryl A. Gayheart
Regulatory Affairs Director
Southern Nuclear Operating Company

CAG/ndj/sm

Enclosure: SNC Response to NRC Request for Additional Information (RAI) – Relief Request FNP-ISI-RR-03

U. S. Nuclear Regulatory Commission
NL-19-0343
Page 2

cc: Regional Administrator, Region II
NRR Project Manager – Farley Nuclear Plant
Senior Resident Inspector – Farley Nuclear Plant
RTYPE: CFA04.054

**Joseph M. Farley Nuclear Plant – Unit 1 and 2
Relief Request FNP-ISI-RR-03
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Enclosure

**SNC Response to NRC Request for Additional Information (RAI)
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NRC RAI 1

Only the materials of construction for Category B-F Item B5.70 welds were listed in the submittal.

- (a) Please discuss the materials of construction (e.g., ASME material specifications) of the other subject welds and adjacent components (nozzles and pipes) in Tables RR-03.1 and RR-03.2 of the relief request.
- (b) If Alloy 82/182 filler metal was used, discuss whether the subject welds have been mitigated to minimize the potential for primary water stress corrosion cracking.

SNC Response to RAI 1

(a)

Table RR-03.1			
Component ID	Component	Material	Reference
ALA1-4103-4	Valve	SA-182 F316	U166878
	Weld	ER 308L or E308L	Grinnell Spool Traveler Q1B13CCA27
	Pipe	SA-376, TP304 or 316	Grinnell Spool Traveler Q1B13CCA27
ALA1-4104-4	Valve	SA-182 F316	U166878
	Weld	ER308L	Grinnell Spool Traveler Q1B13CCA22
	Pipe	SA-376 TP304	Grinnell Spool Traveler Q1B13CCA22
ALA1-4104-5	Valve	SA-182 F316	U166878
	Weld	ER308L	Grinnell Spool Traveler Q1B13CCA22
	Pipe	SA-376 TP304	Grinnell Spool Traveler Q1B13CCA22
ALA1-4108-8-RB	Valve	SA-182 F316	U166880
	Weld	ER 308L	Grinnell spool Traveler Q1E21CCA5
	Pipe	SA-376, TP304 or 316	Grinnell spool Traveler Q1E21CCA5
ALA1-4108-14BW-RB	Tee	SA-403 WP304 or 316	U259976
	Weld	ER 308L	Daniels spool traveler Q1B13CCA17E1523
	Pipe	SA-376 TP316	Daniels spool traveler Q1B13CCA17E1523
ALA1-4202-3-RB	Elbow	SA-403 WP304 or 316	U259449
	Weld	ER 308L or ER 316L	FS-350N
	Pipe	SA-376 TP304	Grinnell spool traveler Q1B13CCA22

(a) Continued

Table RR-03.1 Continued			
Component ID	Component	Material	Reference
ALA1-4202-4-RB	Valve	SA-182 F316	U166878
	Weld	E 308L / ER 308L	Grinnell spool traveler Q1B13CCA22
	Pipe	SA-376, TP304	Grinnell spool traveler Q1B13CCA22
ALA1-4204-4	Valve	SA-182 F316	U166878
	Weld	E 308L / ER 308L	Grinnell Spool Traveler Q1E21CCA27
	Pipe	SA-376 TP304 or 316	Grinnell Spool Traveler Q1E21CCA27
ALA1-4204-5-RB	Valve	SA-182 F316	U166878
	Weld	E 308L / ER 308L	Grinnell Spool Traveler Q1E21CCA27
	Pipe	SA-376 TP304 or 316	Grinnell Spool Traveler Q1E21CCA27
ALA1-4209-11BW-RB	Flange	SA-182 Gr. F316	(1)
	Weld	ER308	(1)
	Pipe	SA-376 TP304	(1)

Note (1)- Per Westinghouse email, the pipe and flange were fabricated at the pump manufacturer.

Table RR-03.2			
Component ID	Component	Material	Reference
APR1-4101-8	Valve	SA-182 Gr F316	U214167
	Weld	E 308L / ER 308L	Grinnell spool traveler Q2B13CCA16
	Pipe	SA-376 TP304 or 316	Grinnell spool traveler Q2B13CCA16
APR1-4102-2-RB	Pipe	SA-376 TP304 or 316	U214253 WO# M5750
	Weld	E308L / ER308L	WO# M5750
	Pipe	SA-376 TP304 or 316	U214253 WO# M5750
APR1-4104-30	Valve	SA-182 Gr F316	U206344
	Weld	E 308L / ER 308L	Grinnell spool traveler Q2E21CCA27
	Pipe	SA-376 TP316	U213288 Grinnell spool traveler Q2E21CCA27

(a) Continued

Table RR-03.2 Continued			
Component ID	Component	Material	Reference
APR1-4106-8-RB	Valve	SA-182 Gr F316	U206343
	Weld	E 308L / ER 308L	Grinnell spool traveler Q2B13CCA6
	Pipe	SA-376 TP316	U213289 Grinnell spool traveler Q2B13CCA6
APR1-4106-11-RB	Branch Connection	SA-403 WP304 or 316	Pipe Specification SS-1109-02
	Weld	E 308L / ER 308L	Grinnell spool traveler Q2B13CCA6
	Pipe	SA-376 TP304 or 316	U213289 Grinnell spool traveler Q2B13CCA6
APR1-4108-11-RB	Valve	SA-182 Gr. F316	U206348
	Weld 31	ER 308L	Grinnell spool Traveler Q2B13CCA5
	Pipe	SA376 TP304	Grinnell spool Traveler Q2B13CCA5
APR1-4108-12-RB	Valve	A182 Gr. F316	U206348
	Weld	ER 308L	Grinnell Spool Traveler E21CCA5-2-6748
	Pipe	SA-376 TP304	Grinnell Spool Traveler E21CCA5-2-6748 U214156
APR1-4108-13-RB	Valve	SA-182 Gr. F316	U205173
	Weld	ER 308L or ER 316L	Grinnell Spool Traveler E21CCA5-2-6748
	Pipe	SA-376 TP304 or 316	Grinnell Spool Traveler E21CCA5-2-6748 U214156
APR1-4301-8	Valve	SA-182 Gr. F316	U214167
	Weld	E 308L / ER 308L	Grinnell Spool Traveler Q2B13CCA16
	Pipe	SA-376 TP304	Grinnell Spool Traveler Q2B13CCA16
APR1-4302-11-RB	Elbow	SA-403, WP304 or 316	U214050
	Weld	ER 308L or ER 316L	FS-350N
	Pipe	SA-376 TP304 OR TP316	U214050

(a) Continued

Table RR-03.2 Continued			
Component ID	Component	Material	Reference
APR1-4302-12-RB	Elbow	SA-403, WP304 or 316	U214050
	Weld	ER 308L or ER 316L	FS-350N
	Pipe	SA-376 TP304 or TP316	U214050
APR1-4304-18	Valve	SA-182 Gr. F316	U206344
	Weld	E 308L / ER 316L	Grinnell Spool Traveler Q2E11CCA22
	Pipe	SA-376 TP316	Grinnell Spool Traveler Q2E11CCA22
APR1-4304-19-RB	Valve	SA-182 Gr. F316	U206344
	Weld	E 308L / ER 308L	Grinnell Spool Traveler Q2E11CCA22
	Pipe	SA-376 TP316	Grinnell Spool Traveler Q2E11CCA22
APR1-4307-21BC-RB	Branch connection	SA-182 F304 or 316	U214253
	Weld	ER 308L	Grinnell Spool Traveler Q2E21CCA21- E7808
	Pipe	SA-376 TP 304 OR 316	Grinnell Spool Traveler Q2E21CCA21- E7808
APR1-4500-1	Branch connection	SA-182 F316	Grinnell spool Traveler 2B13CCAE5365E
	Weld	ER 308L or ER 316L	Grinnell spool Traveler 2B13CCAE5365E
	Pipe	SA-376 TP304	Grinnell spool Traveler 2B13CCAE5365E
APR2-4511-10	Flange	SA-182 F316	Grinnell spool traveler Q2E11CCB32-6
	Weld	ER308L	Grinnell spool traveler Q2E11CCB32-6
	Pipe	SA-376 TP304	Grinnell spool traveler Q2E11CCB32-6
APR2-4511-11	Valve	SA-182 F316	U206344
	Weld	ER308L	Grinnell spool traveler Q2E11CCB32
	Pipe	SA-376 TP316	Grinnell spool traveler Q2E11CCB32 U214081

Table RR-03.2 Continued			
Component ID	Component	Material	Reference
APR2-4511-12	Tee	SA-403 WP 304 or 316	Grinnell spool Traveler Q2E11CCB32-6
	Weld	ER-308L	Grinnell spool Traveler Q2E11CCB32-6
	Elbow	SA-403 WP 304 or 316	Grinnell spool Traveler Q2E11CCB32-6

(b) Filler metal Alloy 82/182 was not used as indicated in the above table.

RAI No. 2

Discuss any factors or other measures that could ensure or monitor the structural integrity of the subject welds, given that certain volume of the subject welds could not be examined. The other measures may include the reactor coolant system leakage detection systems, routine system leakage tests in accordance with IWA/B-5000 of the ASME Code, Section XI, boric acid monitoring programs, operator walkdowns, and any augmented examinations.

SNC Response to RAI 2

The Class 1 pressure testing is performed per IWB-5000 during startup from refueling outages. In accordance with the Boric Acid Corrosion Control Program, Operations and Engineering personnel perform boric acid walkdowns inside containment early in the outage to identify potential leakage areas. Online monitoring and trending is performed on the identified and unidentified leakage in the RCS system per Technical Specification Surveillance Requirement 3.4.13.1.

The Class 2 pressure testing is performed per IWC-5000 once per period. In accordance with the Boric Acid Corrosion Control Program, Operations and Engineering personnel perform boric acid walkdowns inside containment early in the outage to identify potential leakage areas. Additionally, the MRP-192 programs inspects additional locations on Class 2 E11 system.

RAI No. 3

The submittal states that no recordable indications were identified during examination of the Category R-A and Category B-F components. Please confirm whether recordable indications were identified in any of the other subject welds.

SNC Response to RAI 3

All of the datasheets were reviewed for the 4th interval examinations listed in tables RR-03.1 and RR-03.2. No recordable indications were identified on the subject welds.

RAI No. 4

The second paragraph of Applicable Code Requirements states “The extent of examination requirement for Examination Category B-J, Item Numbers B9.11 and B9.21,

Enclosure to NL-19-0343
SNC Response to NRC Request for Additional Information (RAI)
Relief Request FNP-ISI-RR-03

per Table IWB-2500-1, requires a surface and volumetric examination of essentially 100% of the weld length.” However, B9.21 only requires a surface examination method. Additionally, there does not seem to be any welds identified as B9.21 in the submittal. Please confirm whether any B9.21 welds were supposed to be included in the submittal.

SNC Response to RAI 4

There were no limited exams in the Category B-J, Item Number B9.21.