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10 CFR 50.4

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ENGC Ltr. 2.01.052

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

Docket No. 50-293  
License No. DPR-35

Subject: Submittal of Pilgrim Station Comments on NRC Safety Evaluation of Pilgrim's Program for USI A-46 (G.L. 87-02)

References: 1. NRC letter dated August 14, 2000 (Ltr. 1.00.054)  
Subject: Plant-Specific Safety Evaluation of Unresolved Safety Issue (USI) A-46 Program Implementation at Pilgrim Nuclear Power Station (TAC NO. M69471).

Dear Sir:

Reference 1 documents the resolution of USI A-46 for Pilgrim Station. Pilgrim Station staff have reviewed Reference 1 and identified items which should be clarified.

Please find Pilgrim Station's comments on Reference 1 in the enclosure.

Please feel free to contact Mr. Douglas Ellis of my staff, at (508) 830-8160, if you have any questions regarding this subject.

Sincerely,



J. F. Alexander

DWE/  
Enclosure (2 pages)

Cc: see next page

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Entergy Nuclear Generation Company  
Pilgrim Nuclear Power Station

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## ENCLOSURE

Pilgrim Station Comments on  
NRC Letter dated August 14, 2000 (Ltr. 1.00.054)  
Safety Evaluation for USI A-46 Program Implementation at Pilgrim Station

<u>Comment #</u>	<u>Comment</u>
Typo	Cover letter. GL 87-02 not GL 87-07 should be identified.
1	Safety evaluation Section 2.4.1 (second complete sentence in the top paragraph on page 4). The source document for the wording appears to be NRC letter dated 6/17/94 but the source is neither identified in the section nor is the letter listed in Section 5.0 (References). The NRC letter is identified in Section 4 of BECo letter dated 9/30/96 (Ltr. 2.96.085) that is listed as Reference 5. The source document should be clearly identified in Section 2.4.1 and listed in the References.
2	Safety evaluation Section 2.4.2 (page 6) third paragraph second sentence contains typographical errors and omissions. The listed valves should be MO-3800, MO-3801, MO-3805 (not 3905), MO-3806, and MO-3808. Valves MO-3813, MO-4083, and MO-4084 should also be listed in the sentence. All seven valves were listed in Table 5-1 in Table 5-1 of Enclosure B of BECo letter dated September 30, 1996. All seven valves were identified in an NRC letter dated December 16, 1997 (Question 7) that requested an example of a calculation to demonstrate the seismic adequacy of the motor operated valves. BECo letter dated June 15, 1998 provided an example calculation for MO-3801. Thus, the sentence should also be changed to reflect what was done for the valves other than MO-3801. Therefore, Pilgrim Station suggests the second sentence be replaced in its entirety with two sentences to read as follows. "For valve MO-3801, the licensee demonstrated the maximum calculated bending stress in the valve yoke, made of ASTM A-48 Class 40 cast iron having a minimum ultimate strength of 40 ksi, was 2.19 ksi which satisfies the 20-percent requirement criterion of GIP-2. This calculation was typical of the approach used for valves MO-3800, MO-3805, MO-3806, MO-3808, MO-3813, MO-4083, and MO-4084 to ensure the 20-percent requirement criterion of GIP-2 was met."
3	Safety evaluation Section 2.7 (page 9 second paragraph first and second sentences) identifies "Appendix 3" but should identify "Enclosure C Attachment 3" instead of "Appendix 3".
4	Safety evaluation Section 2.8. The source of the information is not identified. The source of the information is BECo letter dated 6/22/98 (Ltr. 2.98.066) that is listed as Reference 7. The source of the information should be identified in Section 2.8, logically in the first paragraph.
Typo	Safety evaluation Section 2.8 (page 10 second and fourth paragraphs) identifies UFSAR Chapter 15 (accident analysis for loss of offsite power) instead of Chapter 14. Pilgrim's UFSAR does not contain a Chapter 15 and the accident analyses, including loss of offsite power, is contained in UFSAR Chapter 14.

**Comment #**      **Comment**

5            Safety evaluation Section 2.9 (fourth paragraph second sentence) should be clarified regarding the revised application of Method A.1 for SSEL items relative to grade. The revised application of Method A.1 redefined the effective grade as the foundation level of the respective building instead of the site grade (23-foot elevation). The effective grades of the buildings were identified in BECo letter dated June 15, 1998 (Ltr. 2.98.045 Attachment A, response to question #2). This means that SSEL components more than 40 feet above the top of the foundation mat of the respective building and previously satisfying Method A needed to be re-evaluated using Method B. Some of the re-evaluated components satisfied Method B and the balance of the components became capacity/demand outliers. Thus, for clarity Pilgrim suggests the sentence be corrected or deleted.

6            Safety evaluation Section 4.0 (second paragraph first sentence) is not clear and appears to impose a restriction that Pilgrim not modify the licensing basis to permit the use of the GIP methodology until after receipt of the supplement (to this safety evaluation report) which confirms receipt of Pilgrim's completion letter for A-46. Pilgrim expects to send the completion letter to the NRC after the 2001 refueling outage (RFO-13). In essence, the first sentence appears to be a NRC stipulated provision that is different from other A-46 safety evaluations, possibly because other plants completed their A-46 programs before the safety evaluation for Pilgrim was prepared. If a replacement component is needed before the NRC issues the supplement (to this safety evaluation report), which confirms receipt of the completion letter, and the component is only available as a commercial grade item, it may be desirable to use the GIP methodology under certain circumstances. As worded, the NRC stipulated provision could hinder the replacement of a component if the replacement component is available only as a commercial grade item.

7            Safety evaluation Section 5.0 (page 13) reference 14 is listed but is not identified or referenced in the safety evaluation. The inclusion of the reference and its relevance in the safety evaluation is not clear.

8            Safety evaluation Section 5.0 does not include the following A-46 related correspondence:

BECo letter dated 10/11/88 (Ltr. 2.88.145) regarding the initial A-46 schedule.

BECo letter dated 2/1/93 (Ltr. 2.93.019) regarding no objections to new NRC positions.

BECo letter dated 2/9/94 (Ltr. 2.94.016) regarding design floor response spectra.

NRC letter dated 6/17/94 (Ltr. 1.94.121) regarding re-evaluation of approach for developing floor response spectra. This letter is related to comment #1.

BECo letter dated 3/22/99 (Ltr. 2.99.033) regarding A-46 schedule changes.