

December 11, 2001

LICENSEE : Duke Energy Corporation

FACILITIES: McGuire, Units 1 and 2, and Catawba, Units 1 and 2

SUBJECT: TELECOMMUNICATION WITH DUKE ENERGY CORPORATION TO DISCUSS
INFORMATION IN THEIR LICENSE RENEWAL APPLICATION ON THE FIRE
PROTECTION PROGRAM

On November 8, 2001, after the NRC (the staff) reviewed information provided in Appendix B of the license renewal application (LRA), a conference call was conducted between the staff and Duke Energy Corporation (the applicant) to clarify information presented in the application pertaining to Section B.3.12, the Fire Protection Program.

The questions asked by the staff, as well as the responses provided by the applicant, are as follows:

1. The application states in Sections B.3.12.1, Fire Barrier Inspections, and B.3.12.2, Mechanical Fire Protection Components, that no preventive actions are taken to prevent aging effects or to mitigate aging degradation. Provide your justification for this course of action in light of the fact that operating experience at Catawba/ McGuire indicates that degradation and wall thinning in piping has been observed to the extent that sections of the piping were replaced due to leakage.

The applicant indicated that the Fire Protection Program is credited as a condition monitoring program, such that preventive actions are not applicable. The applicant referred the staff to the Standard Review Plan for License Renewal (SRP-LR), page A.1-3, which states that condition monitoring programs do not rely on preventive actions and this information need not be provided. The staff is satisfied with this response and has no additional questions on this issue.

2. The application states in Section B.3.12.2, "Mechanical Fire Protection Component Tests and Inspections-Monitoring and Trending", of the LRA that a sample of sprinklers are either inspected or replaced after 50 years of operation. Describe the basis for the sampling process. Also, provide the rationale for either inspection or replacement of only some of the sprinklers after 50 years of operation.

The applicant indicated that the Underwriters Laboratories (UL) listing for the sprinklers is 50 years, and National Fire Protection Association (NFPA) Code 20, Section 2-3.1.1, specifies the sprinkler sampling methodology. The code dictates a sample size (of not fewer than four or one percent) requires diverse systems and environments to be represented. The staff will review the applicable section of NFPA-20, but may request additional information to (1) provide the applicant an opportunity to submit this information in their written response, and (2) to understand the rationale for either inspection or replacement of only some of the sprinklers after 50 years.

3. With regard to the monitoring and trending activities, fouling of hose station valves and sprinklers are managed by flow tests and flushes which are governed by Selected

Licensee Commitment (SLC) 16.9.1(a)(iii) at Catawba and Testing Requirement (TR) 16.9.1.3 at McGuire. What are the differences between these two requirements?

The applicant indicated that the tests were the same, although the test is required by a SLC at Catawba and by a TR at McGuire. The tests involve a high-velocity flush to remove debris from hose station valves and sprinklers and a main header flow test, which is compared to hydraulic calculations. The applicant suggested that the staff review both requirements to verify that there are no substantive differences. The staff will review and compare SLC 16.9.1(a)(iii) and TR 16.9.1.3 and will determine if additional information is needed to complete its review of this item.

4. With regard to the monitoring and trending activities, the integrity of the sprinkler branch lines is assured by sprinkler system flow tests which are governed by Selected Licensee Commitment TR 16.9-2(a)(iv)(1) at Catawba. This test is not governed by Selected Licensee Commitment at McGuire, but is performed to satisfy a specific plant procedure. Specify the governing requirements for this test at McGuire and how these requirements differ from those at Catawba, and why.

The applicant and staff agreed that a request for additional information would be issued to provide the applicant an opportunity to submit an official response.

5. With regard to the monitoring and trending activities, explain the basis for the sample disassembly inspection program for managing the fouling of sprinkler branch lines. Specifically, explain how the sample of branch lines is selected (basis for selection) and how the number of branch lines to be sampled is determined (basis for sample size).

The applicant and staff agreed that a request for additional information would be issued to provide the applicant an opportunity to submit an official response.

6. The acceptance criteria for visual inspection of sprinklers do not contain any requirements for restraining excessive displacement at damaged or malfunctioning pipe hangers. Such requirements seem to be particularly significant for those piping runs where operating experience indicates that fouling has been detected and sections of piping have been replaced due to pinhole leaks. Indicate whether or not requirements exist to limit excessive displacement of sprinkler piping due to degraded hangers. If they do exist, state those requirements.

The applicant indicated that the acceptance criteria discussion in the LRA provided more detail with respect to "missing pipe hangers" than is credited for aging management. The applicant referred the staff to Section 2.4.3 of the LRA on page 2.4-11, where component supports (hangers) are addressed. The staff reviewed this section of the LRA as well as Table 3.5-3 on page 3.5-21, which addresses pipe support (first item in the table). The staff noted that notes 2, 7 and 11 apply for pipe supports, and that note 11 covers supports for piping used to mitigate regulated events (e.g. fire). As such, the staff is satisfied with this response and has no additional questions on this item.

A draft of this telecommunication summary was provided to the applicant to allow them the opportunity to comment prior to the summary being issued.

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/RA/

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Office of Nuclear Reactor Regulation

Docket Nos. 50-369, 50-370, 50-413, and 50-414

Attachment: As stated

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/RA/

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