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**Subject:** CAC bolting issue assessment

*B-32*

## Evaluation of Corrosion Identified on Several Containment Air Cooler Nuts and Welds

On February 11, during a tour of the containment building, the inspectors identified four material condition issues. The licensee initiated condition report (CR) 04-01177, "Items Identified During Senior NRC Tour of Containment," and documented the issues/resolutions as follows:

- Pressurizer Heater Cables Were Supported By Blue Tie-Wraps: The tie-wraps were removed and cables arranged appropriately by electricians.
- Containment Air Cooler Drain Was Clogged and Spilling Water: The licensee issued a work order and performed work to clear the clogged line.
- Rust Found on Containment Air Cooler Stainless Steel Header Piping: This issue had been previously identified and documented in CR 03-04638, "Unexpected Observation of Material Used for Containment Air Coolers." The licensee's evaluations of the issue stated the rust was due to surface contamination either during or after fabrication, with the probable source being embedded particles of carbon steel left by commonly used carbon steel cleaning tools such as wire brushes or needle grinders. The licensee concluded that the oxidized layer remained thin and presented no danger of serious degradation, therefore required no additional corrective actions.
- Containment Air Cooler Service Water Tree Support Header Pedestal Bolts Found With Surface Rust: This issue had been previously identified in CR 03-09479, "CAC Service Water Tree Fasteners Corroding." The licensee closed this issue with the following justification: "Design Engineering and the drawings for these bases, specify ASTM A193, Grade B-7 bolting, which is carbon steel. The reason engineering chose the B-7 material in lieu of stainless steel, was for shear strength. Engineering also said that no painting of the bolts was required. No Deficiency exists."

Subsequent to the questions raised by the inspectors and the initiation of CR 04-01177, the licensee initiated further evaluation of the containment air cooler bolting issue in CR 04-01212, "Bolts on the Supports for the CAC Piping are Unpainted and Shows Signs of Rust." The evaluation stated that the engineering work request that installed the supports required that all exposed carbon steel and concrete surfaces shall be primed and painted. The resolution of the issue was to initiate a work order [Order 200083336] to coat the subject bolts in accordance with appropriate specification. This will be accomplished prior to Mode 2.

Although the condition report stated that the work would be accomplished prior to Mode 2, the issue was dispositioned by the RSRB as a post-restart item and the Mode 2 restraint was closed with a due date [for the corrective action of coating the bolts] of March 28, 2004. After discussions with the inspectors regarding the timeliness of this corrective action, the Maintenance Supervisor is currently reassessing the disposition of this corrective action as post-restart.

The inspectors will further evaluate what may be a work performance issue regarding whether or not the engineering work request specifically required the carbon steel bolts to be coated. The inspectors evaluated the licensee's actions to correct the deficiencies described above and found them to be adequate.