

July 11, 2005

LICENSEE: Nuclear Management Company, LLC

FACILITY: Palisades Nuclear Plant

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE HELD ON JUNE 28, 2005,
BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND
NUCLEAR MANAGEMENT COMPANY, LLC, CONCERNING DRAFT
REQUESTS FOR ADDITIONAL INFORMATION PERTAINING TO THE
PALISADES NUCLEAR PLANT LICENSE RENEWAL APPLICATION

The U.S. Nuclear Regulatory Commission staff (the staff) and representatives of Nuclear Management Company, LLC (NMC) held a telephone conference on June 28, 2005, to discuss and clarify the staff's draft requests for additional information (D-RAIs) concerning the Palisades Nuclear Plant License Renewal Application. The conference call was useful in clarifying the intent of the staff's D-RAIs.

Enclosure 1 provides a listing of the conference call participants. Enclosure 2 contains a listing of the D-RAIs discussed with the applicant, including a brief description on the status of the items.

The applicant had an opportunity to comment on this summary.

/RA/

Michael J. Morgan, Project Manager
License Renewal Section A
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket No.: 50-255

Enclosures: As stated

cc w/encls: See next page

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DISTRIBUTION: Summary of telephone conference held on June 28, 2005 with NMC,
Dated: July 11, 2005

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TO DISCUSS THE
LICENSE RENEWAL APPLICATION
JUNE 28, 2005**

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**DRAFT REQUESTS FOR ADDITIONAL INFORMATION (D-RAI)
BOLTING INTEGRITY (NON-CLASS 1 BOLTING)
PALISADES NUCLEAR PLANT
LICENSE RENEWAL APPLICATION
JUNE 28, 2005**

The U.S. Nuclear Regulatory Commission staff (the staff) and representatives of Nuclear Management Company, LLC, (NMC) held a telephone conference call on June 28, 2005, to discuss and clarify the staff's draft requests for additional information (D-RAIs) concerning the Palisades Nuclear Plant license renewal application (LRA). The following D-RAIs were discussed during the telephone conference call.

D-RAI B.2.1.3-1(a)

GALL AMP XI.M18 identifies that the program covers both greater than and smaller than 2-inch diameter bolting. The LRA AMR Tables and Bolting Integrity AMP do not specifically identify the bolt size and the applicant is requested to clarify if the scope of the Bolting Integrity Program includes both greater than and smaller than 2-inch diameter bolting.

Discussion: The applicant indicated that the requested information refers to all bolting (as specified in the applicant's Bolting Integrity Program). Therefore, this question is WITHDRAWN and will not be sent as a formal RAI.

D-RAI B.2.1.3-1(b)

The LRA AMR Tables and AMP B.2.1.3 or AMP B.2.1.5 do not identify if any bolting is exposed to soil. The applicant is requested to identify if any bolting is used in buried applications and to clarify if the Bolting Integrity Program or the Buried Services Corrosion Monitoring Program manage such bolting.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI B.2.1.3-1(c)

EPRI NP-5769, used as a basis for GALL XI.M18, identifies that loss of preload is caused by a number of factors including stress relaxation (both at room temperature and elevated temperature), thermal cycling (particularly for gaskets), creep and flow of gasket material during initial compression, vibration and shock, and elastic interactions between separately-tightened bolts. Notes 206, 324 and 406 in LRA AMR Tables state that loss of preload is included here in response to recent NRC RAIs on non-primary system, high temperature bolting that may experience loss of preload. Considering that, on the basis of EPRI NP-5769, loss of preload may occur at room temperature, the applicant is requested to define high temperature and clarify if loss of preload is managed for all closure bolting within scope of license renewal.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI B.2.1.3-1(d)

The applicant is requested to clarify if there are any in-scope, high strength (actual yield strength > 150 ksi) structural bolting or fasteners used for Palisades NSSS component supports or other non-class 1 applications.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI B.2.1.3-2(a)

LRA Section B.2.1.3, preventive actions, states that the use of lubricants generally meet the recommendations of EPRI NP-5769 and NUREG-1339 and under enhancements the applicant plans a revision to the procedures that implement the credited programs, including use of lubricants and sealants to bring the Bolting Integrity Program into conformance with the NUREG-1801 program description. With regards to the use of lubricants, the use of the term “generally meet” is not clear. The applicant is requested to clarify if any exceptions to the NUREG-1801 program and its bases are necessary for the use of lubricants.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI B.2.1.3-3(a)

NUREG-1801 AMP XI.M18, element 4, identifies inspection techniques such as removing the bolt, proof test by tension or torquing, by situ ultrasonic tests or hammer tests. The applicant credits both visual and volumetric inspections of bolting. It is not clear how crack initiation due to cyclic loading or SCC is detected by visual inspection where the thread surface is not readily visible. Where visual inspection is applied, the applicant is requested to clarify how crack initiation due to cyclic loading or SCC is detected for applications where the thread surface is not readily visible. If leakage detection is the only method applied, the applicant should so clarify. In addition, if removal of the bolting and inspection during maintenance or augmented inspection is credited, the applicant should so clarify.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI B.2.1.3-3(b)

LRA Section B2.1.3 identifies the ASME Section XI Inservice Inspection Program for managing non-class 1 safety related pressure retaining and support bolting. The LRA B2.1.2 Inservice Inspection Program references the requirements of 10 CFR 50.55a for the Section XI edition. GALL XI.M3 includes visual, surface and volumetric examinations in accordance with IWA-2000 of the 1995 edition through the 1996 addenda of ASME Section XI. The applicant is requested to clarify if detection of aging effects in bolting using the ASME Section XI edition identified in 10 CFR 50.55(a) is consistent with or conservative compared to the 1995 edition through the 1996 addenda identified in NUREG-1801 XI.M3. If the new code edition is less restrictive, the applicant is requested to include a commitment to submit an evaluation to the NRC for review to demonstrate that aging effects are being adequately managed.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI B.2.1.3-3(c)

Under “Detection of Aging Effects” item of Section B2.1.3, Bolting Integrity Program, it is indicated that structural bolting and fasteners both inside and outside containment are inspected by visual examination in accordance with the Structural Monitoring Program. The applicant is requested to clarify how the visual examination of structural bolting and fasteners is implemented pursuant to the Palisades’ Structural Monitoring Program, including a list of plant-

specific programs or procedures that will be used to timely dispose the identified bolting or fastener degradation events.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI B.2.1.3-4(a)

NUREG-1801 AMP XI.M18 element 6 (Acceptance Criteria) indicates that immediate repairs be done for major leaks that may cause corrosion or contamination. LRA AMP B2.1.3 states that the Palisades Bolting Integrity program makes no distinction regarding "immediate" repairs, but instead relies upon the plant inservice inspection program and corrective action process to evaluate, prioritize and schedule repairs. The operating experience section of AMP B2.1.3 states that the Bolting Integrity program has been effective in identifying bolting degradation in a timely manner, thus ensuring that age related degradation of bolting will be effectively managed throughout the license renewal period. The applicant identifies six instances where the ISI program has been instrumental in discovering bolting degradation. The applicant concludes that reviews of internal and external assessments of the program have been reviewed and the reports demonstrate that the program has effectively identified and dispositioned issues that could have led to degraded conditions. The applicant is requested to specifically address if these reports represent objective evidence to demonstrate that the Action Request Process and Corrective Action Process have been effective in initiating timely repairs for bolting, including structural bolting and fasteners. The applicant is also requested to explain plant specific operating experience regarding aging management of any Non-Class 1 high strength bolting, including structural bolting.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI B.2.1.3-5(a)

Section A2.3 of the LRA states that the program considers the guidelines delineated in NUREG-1339 for a bolting integrity program, EPRI NP-5769 (with the exceptions noted in NUREG-1339) for safety related bolting, and EPRI TR-104213 for non-safety related bolting. The use of the term "considers" is not definitive. The applicant is requested to clarify if the program "relies on" or is consistent with these documents.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.