

August 2, 2005

LICENSEE: Nuclear Management Company, LLC

FACILITY: Palisades Nuclear Plant

SUBJECT: SUMMARY OF A TELEPHONE CONFERENCE HELD ON JULY 20, 2005,  
BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION (NRC)  
AND NUCLEAR MANAGEMENT COMPANY, LLC (NMC) CONCERNING  
RESPONSES TO OPEN QUESTIONS FROM THE SITE AGING  
MANAGEMENT PROGRAM AUDIT (TAC NO. MC6433)

The NRC staff (the staff) and representatives of Nuclear Management Company, LLC (NMC) held a telephone conference on July 20, 2005, to discuss and clarify the applicant's responses to open questions from the site aging management program audit. The conference call was useful in clarifying these responses.

Enclosure 1 provides a listing of the conference call participants. Enclosure 2 contains a listing of the questions 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/(S. Lee for)***

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 July 20, 2005 with NMC, LLC  
Dated: August 2, 2005

**ADAMS Accession No.: ML052140634**

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**LIST OF PARTICIPANTS FOR TELEPHONE CONFERENCE  
TO DISCUSS RESPONSES TO OPEN QUESTIONS FROM THE SITE AGING  
MANAGEMENT PROGRAM AUDIT  
JULY 20, 2005**

**Participants**

Michael Morgan  
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Michael Kennedy  
Darrel Turner  
Robert Vincent

**Affiliations**

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Information Systems Laboratories, Inc. (ISL)  
Nuclear Management Company, LLC (NMC)  
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**RESPONSES TO OPEN QUESTIONS FROM THE  
AGING MANAGEMENT PROGRAM AUDIT PALISADES NUCLEAR PLANT  
LICENSE RENEWAL APPLICATION  
JULY 20, 2005**

The U.S. Nuclear Regulatory Commission staff (the staff) and representatives of Nuclear Management Company, LLC (NMC), held a telephone conference call on July 20, 2005, to discuss and clarify the applicant's responses to open questions from the Palisades Nuclear Plant (PNP) Aging Management Program audit. The following questions were discussed during the telephone conference call.

**Question B2.1.5-002**

This question is presented for clarification purposes. The response is not consistent with the discussions during the audit on-site. Per the project team's discussions with the applicant, PNP does not have any buried piping which is managed by the B2.1.5 AMP and is subject to selective leaching. It was the team's understanding that all materials susceptible to selective leaching are in the fire protection system and are managed by the Fire Protection AMP. Does PNP intend to modify the LRA AMP B2.1.5, to delete the discussion on management of selective leaching or has the team misunderstood PNP representative's statements; i.e., B2.1.5 is not used in conjunction with AMR line items identifying components made from materials that are susceptible to selective leaching?

**Discussion:** Based on the discussion with the applicant, this question will be deferred for further clarification during the August 1 thru 5, 2005 audit. The staff agreed to the proposal.

**Question B2.1.5-007**

This question is presented for clarification purposes. The response is not relevant to the question originally asked by the project team. The applicant should provide additional information related to operating experience (OE) as was discussed during the team's site interviews.

**Discussion:** Based on the discussion with the applicant, this question will be deferred for further clarification during the August 1 thru 5, 2005 audit. The staff agreed to the proposal.

**Question B2.1.5-008**

This question is presented for clarification purposes. The applicant's response is the same as provided in its response to Question B2.1.5-009. The project team requests the applicant to: (1) identify how many times it has excavated buried piping; (2) identify which pipes or systems were excavated; (3) provide the results observed from these inspections, and (4) identify the years when these inspections were performed.

**Discussion:** Based on the discussion with the applicant, this question will be deferred for further clarification during the August 1 thru 5, 2005 audit. The staff agreed to the proposal.

**Question B2.1.5-009**

This question is presented for clarification purposes. The applicant's response to this question is incomplete since it only provides the conclusion that the failures were design discrepancies. Please describe the type of failure mechanisms (not just the conclusion), that have occurred in the Auxiliary Feedwater and Fire Protection Systems piping (including year, location and a brief description of the event). Then explain why these failures were not age-related.

**Discussion:** Based on the discussion with the applicant, this question will be deferred for further clarification during the August 1 thru 5, 2005 audit. The staff agreed to the proposal.

**Question B2.1.7-004**

This question is presented for clarification purposes. The applicant's response to this question references ASME Section XI, Subsection IWE instead of IWL, which is the subject of this question. Does the applicant intend to modify its response to correct this apparent typographical error?

**Discussion:** The applicant determined that this was a typographical error and the applicant also indicated that the question is clear. This applicant will correct this error.

**Question B2.1.10-011**

This question is presented for clarification purposes. The applicant's response primarily focuses on the qualification of personnel. The project team's question was intended to focus on the actual inspection methodology. Please provide a technical justification as to how the visual inspection is equivalent, which the applicant has stated, and assures the same level flaw identification and documentation as would be achieved by VT-1 and VT-3.

**Discussion:** Based on the discussion with the applicant, this question will be deferred for further clarification during the August 1 thru 5, 2005 audit. The staff agreed to the proposal.

**Question B2.1.10-017**

This question is presented for clarification purposes. Only the first two sentences of the applicant's response touch on the essence of the project team's question. The subsequent sentences of the applicant's response address history, and what actions are taken should a crack larger than ¼ inch be identified during an inspection. The focus of the team's question is a request for the applicant to justify why the ¼ inch wide crack is technically acceptable. Neither of the first two sentences provide a satisfactory justification as to why this size crack is acceptable. The response only provides a comparison to the gap permitted at the bottom of a fire door. It is not clear to the team why a ¼ inch crack in a fire seal would respond during a fire in a manor similar to the gap at the bottom of the fire door. Please enhance the response to characterize the technical basis for accepting the ¼ inch crack. Without such a technical justification, the team would not be able to accept the exception proposed by the LRA.

**Discussion:** Based on the discussion with the applicant, this question will be deferred for further clarification during the August 1 thru 5, 2005 audit. The staff agreed to the proposal.

**Question B2.1.10-023**

This question is presented for clarification purposes and is a generic question. This is an open issue until a decision is made on how to capture enhancements to the AMPs for the license renewal (i.e., in Appendix A or a commitment list). During the interviews, the auditor asked the applicant to add the industry's and NRC's new position on underground piping inspection to the response to this question. Note that selective leaching is applicable to the underground piping that is managed by the fire protection AMP. Therefore, selective leaching mechanism should be discussed.

**Discussion:** Based on the discussion with the applicant, this question will be deferred for further clarification during the August 1 thru 5, 2005 audit. The staff agreed to the proposal.



**Question B2.1.14-003**

This question is presented for clarification purposes. The testing frequency of the Shield Cooling System heat exchanger is not addressed. GALL recommends a maximum interval of five years for the heat exchanger performance testing. Is it the applicant's intent to reduce the inspection frequency to a 5-year periodicity?

**Discussion:** Based on the discussion with the applicant, this question will be deferred for further clarification during the August 1 thru 5, 2005 audit. The staff agreed to the proposal.

**Question B2.1.19-005**

The response itself is acceptable. However, an LRA supplement is needed to actually add to the Structural Monitoring Program that the inspection of unreinforced block walls will be on a more frequent basis than reinforced walls. This would result in the PNP AMP agreeing with the recommendation in the GALL AMP for block walls.

**Discussion:** Based on the discussion with the applicant, this question will be deferred for further clarification during the August 1 thru 5, 2005 audit. The staff agreed to the proposal.

**Question B2.1.19-006**

The response itself is acceptable. However, an LRA supplement is needed to actually add to the Structural Monitoring Program that inspection of inaccessible areas will be performed when they become accessible due to excavation from normal PNP activities.

**Discussion:** Based on the discussion with the applicant, this question will be deferred for further clarification during the August 1 thru 5, 2005 audit. The staff agreed to the proposal.

**Question B2.1.19-008**

This question is presented for clarification purposes. The response mentions how the Structural Monitoring Program at PNP requires more frequent inspections of areas showing signs of aging, such as the wall cracks. However, the response does not identify the frequency of future inspections of the cracked wall under the Structural Monitoring Program. Is it the intent of the applicant to identify the frequency in its response? Instead, the response gives the flood barrier inspection frequency for the room where the wall cracks exist. Is it the intent of the applicant to docket this frequency under oath and affirmation?

**Discussion:** Based on the discussion with the applicant, this question will be deferred for further clarification during the August 1 thru 5, 2005 audit. The staff agreed to the proposal.

**Responses to the following open questions were acceptable:**

Question B2.1.5-010	Question B2.1.10-008
Question B2.1.10-022	Question B2.1.14-011
Question B2.1.18-009	Question B2.1.18-010