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To: "Ngoc Le" <NBL@nrc.gov>
Date: 8/10/05 9:06PM
Subject: FW: NRC Request SWP RAI Status

Tommy,

>

Attached is the response to the NRC questions from Tuesday regarding the System Walkdown Program RAIs.

Dave

> <<NRC Request SWP RAI Status.doc>>

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NRC Request

NMP System Walkdown Program RAI Status

On August 8, 2005, Messrs. Tommy Le and P. Y. Chen requested information regarding any changes to the previous responses to the RAIs on the NMP System Walkdown Program. They requested that NMP provide a summary of any changes and/or confirm there were no changes. The following provides the requested information.

Background

By letter dated November 17, 2004, the NRC transmitted 5 RAIs regarding the NMP System Walkdown Program. The responses to these RAIs were provided by NMP letter NMP1L 1901, dated December 17, 2004. On July 14, 2005, NMP transmitted an Amended LRA which included, among other information, responses to RAIs. Additionally, NMPNS submitted letter NMP1L 1960, dated July 14, 2005, which indicated that a portion of one of the previous responses to the System Walkdown Program RAIs was superseded and for three other responses the description in the Amended LRA was reworded but the intent of the response remained unchanged.

RAI Response Status

RAI B2.1.33-1: As stated in NMP letter NMP1L 1960, 'Portions are superseded by responses to RAIs 2.1-4, 2.2-3 and 3.1.2.C.4-1 in NMP1L 1958 dated July 14, 2005'. The complete list of NMP1 and NMP2 systems that credit the System Walkdown Program for aging management is provided below along with the corresponding Amended LRA section number (those systems in italics are new).

NMP1 Systems:

- *Circulating Water* 3.3.2.A.1
- *City Water* 3.3.2.A.2
- *Compressed Air* 3.3.2.A.3
- *Condensate and Condensate Transfer* 3.4.2.A.1
- *Condenser Air Removal and Off-Gas* 3.4.2.A.5
- *Containment Spray* 3.2.2.A.1
- *Containment System* 3.3.2.A.4
- *Control Rod Drive* 3.1.2.A.5
- *Control Room HVAC* 3.3.2.A.5
- *Core Spray* 3.2.2.A.2
- *Diesel Generator Building Ventilation* 3.3.2.A.6
- *Electric Steam Boiler* 3.3.2.A.24
- *Emergency Cooling* 3.2.2.A.3
- *Emergency Diesel Generator* 3.3.2.A.7
- *Feedwater/High Pressure Coolant Injection* 3.4.2.A.2

- Fire Detection and Protection 3.3.2.A.8
- (Hydrogen Water Chemistry deleted from list)
- *Liquid Poison* 3.3.2.A.10
- Main Generator and Auxiliary 3.4.2.A.3
- Main Steam 3.4.2.A.4
- *Main Turbine and Auxiliary* 3.4.2.A.6
- Misc Non-Contaminated Vents & Drains 3.3.2.A.11
- *Moisture Separator Reheater Steam* 3.4.2.A.7
- Neutron Monitoring 3.3.2.A.12
- Radwaste Building HVAC 3.3.2.A.13
- Radwaste System 3.3.2.A.14
- Reactor Building Closed Loop Cooling 3.3.2.A.15
- Reactor Building HVAC 3.3.2.A.16
- Reactor Vessel Instrumentation 3.1.2.A.3
- *Reactor Recirculation System* 3.1.2.A.4
- Reactor Water Cleanup 3.3.2.A.17
- Sampling System 3.3.2.A.18
- Service Water 3.3.2.A.19
- Shutdown Cooling 3.3.2.A.20
- Spent Fuel Pool Filtering and Cooling 3.3.2.A.21
- Turbine Building Closed Loop Cooling 3.3.2.A.22
- Turbine Building HVAC 3.3.2.A.23

NMP2 Systems:

- Air Startup – Standby Diesel Generator 3.3.2.B.1
- Alternate Decay Heat Removal 3.3.2.B.2
- *Auxiliary Boiler* 3.3.2.B.33
- Auxiliary Service Building HVAC 3.3.2.B.3
- *Circulating Water* 3.3.2.B.34
- (Chilled Water Ventilation deleted from list)
- Compressed Air 3.3.2.B.5
- Condensate System 3.4.2.B.2
- (Containment Atmosphere Monitoring deleted from list)
- Control Building Chilled Water 3.3.2.B.8
- Control Building HVAC 3.3.2.B.9
- *Control Rod Drive* 3.1.2.B.5
- Diesel Generator Building Ventilation 3.3.2.B.10
- Domestic Water 3.3.2.B.11
- Engine-Driven Fire Pump Fuel Oil 3.3.2.B.12
- *Extraction Steam & Feedwater Heater Drains* 3.4.2.B.6
- Feedwater 3.4.2.B.3
- Fire Detection and Protection 3.3.2.B.13
- Floor and Equipment Drains 3.3.2.B.14

• Generator Standby Lube Oil	3.3.2.B.15
• (Glycol Heating deleted from list)	
• High Pressure Core Spray	3.2.2.B.2
• Hot Water Heating	3.3.2.B.17
• Hydrogen Recombiner System	3.2.2.B.1
• Low Pressure Core Spray	3.2.2.B.3
• Main Condenser Air Removal	3.4.2.B.1
• Main Steam	3.4.2.B.4
• Makeup Water	3.3.2.B.18
• Moisture Separator and Reheater	3.4.2.B.5
• Primary Containment Purge	3.3.2.B.20
• (Process Sampling deleted from list)	
• <i>Radioactive Liquid Waste Management</i>	3.3.2.B.36
• Reactor Building Closed Loop Cooling	3.3.2.B.22
• Reactor Building HVAC	3.3.2.B.23
• Reactor Core Isolation Cooling	3.2.2.B.4
• (Reactor Pressure Vessel deleted from list)	
• Reactor Pressure Vessel Instrumentation	3.1.2.B.3
• (Reactor Recirculation deleted from list)	
• Reactor Water Cleanup	3.3.2.B.24
• Residual Heat Removal	3.2.2.B.5
• <i>Roof Drainage System</i>	3.3.2.B.37
• <i>Sanitary Plumbing and Drains</i>	3.3.2.B.38
• (Seal Water deleted from list)	
• Service Water	3.3.2.B.26
• Spent Fuel Pool Cooling and Cleanup	3.3.2.B.27
• Standby Diesel Generator Fuel Oil	3.3.2.B.28
• Standby Diesel Generator Protection	3.3.2.B.29
• Standby Gas Treatment	3.2.2.B.6
• <i>Turbine Building Closed Loop Cooling</i>	3.3.2.B.40
• <i>Turbine Main System</i>	3.4.2.B.7
• <i>Water Treatment</i>	3.3.2.B.35
• Yard Structures Ventilation	3.3.2.B.31

RAI B2.1.33-2: As stated in NMP letter NMP1L 1960, 'No change to RAI response is required. B2.1.33, Systems Walkdown Program, was modified subsequent to the RAI response. No change in intent.' Section B2.1.33, under the Parameters Monitored/Inspected heading, of the Amended LRA has been reworded to state:

'System engineers conduct visual inspections of accessible portions of credited systems and components WSLR. Visible degradation, anomalous indications, or adverse conditions are documented and evaluated. Adverse conditions that can lead to aggressive environments for inscope components, such as evidence of

leakage, wetted insulation, or degraded non-safety related or out of scope piping or anchor points attached to in-scope portions, are also monitored.'

While the paragraph has been reworded to provide clarification, the response to RAI B2.1.33-2 provided in NMP letter NMP1L 1901, dated December 17, 2004, remains valid.

RAI B2.1.33-3: The original response to this RAI remains valid and unchanged by the Amended LRA. The Amended LRA has been reworded to state that incorporation of acceptance criteria into the program procedures is an enhancement and the RAI response provides additional information for your use.

RAI B2.1.33-4: As stated in NMP letter NMP1L 1960, 'No change to RAI response is required. B2.1.33, Systems Walkdown Program, was modified subsequent to the RAI response. No change in intent.' Section B2.1.33, under the Program Description heading, of the Amended LRA has been reworded to state:

'The Systems Walkdown Program is an existing plant-specific program that consists of the ten elements described in Appendix A of NUREG-1800 (Reference 1). The Systems Walkdown Program manages aging effects for accessible external surfaces of systems and components WSLR at NMPNS. The aging effects of concern are material degradation and loss of material from external surfaces of pumps, valves, piping, bolts, heat exchangers, tanks, HVAC components, and other components. The program also identifies adverse conditions that can lead to aggressive environments for systems or components within the scope of LR. Program activities include system engineer walkdowns (i.e., field evaluations of system components to assess material condition), documentation and evaluation of inspection results, and appropriate corrective actions.'

While the paragraph has been reworded to provide clarification, the response to RAI B2.1.33-4 provided in NMP letter NMP1L 1901, dated December 17, 2004, remains valid.

RAI B2.1.33-5: As stated in NMP letter NMP1L 1960, 'No change to RAI response is required. B2.1.33, Systems Walkdown Program, was modified subsequent to the RAI response. No change in intent.' While the Enhancements portion of Section B2.1.33 has been reworded in the Amended LRA to provide clarification, the original response to this RAI in NMP letter NMP1L 1901 remains valid and unchanged.