

**From:** <joseph.bauer@exeloncorp.com>  
**To:** <GFD@nrc.gov>  
**Date:** 9/28/05 3:36PM  
**Subject:** FW: Clarification of 2.206 Questions

George,

I added some additional verbiage to the "Last Sentence" information below that further addresses "loose parts retrieval." Delete the sentence in red. Add the bolded text in black font.

The concerned individual made the observation that the statement: "the licensee has a loose parts monitoring and retrieval system," is incorrect. We concur that this statement is in error. There is a loose parts monitoring system at Byron Station; however, there is no "pre-established" retrieval system. Guidance for operation of the Loose Parts Monitoring System and identification/determination of a loose part is given in procedure, BOP LM-5, "Loose Parts Monitoring System Operation and Alarm Response," and Byron Annunciator Response procedure, BAR 1-13-E9, "Loose Parts Monitoring System Trouble." The retrieval of a loose part would be addressed on a case-by-case basis depending on the size and location of the loose part. Guidance for evaluating the consequences of loose parts on nuclear fuel is provided in procedure, NF-AP-130-3760, "PWR Fuel Lost Parts Evaluations." In addition, procedure MA-AA-716-008, "Foreign Material Exclusion Program," provides guidance for investigation and recovery actions when unexpected foreign material is discovered in a system.

Let me know if there is anything else you need.

Joe

> -----Original Message-----

> From: Bauer, Joseph A.

> Sent: Monday, September 26, 2005 2:05 PM

> To: George Dick (E-mail)

> Cc: Grundmann, William E.; Langan, Joseph E.; Chrzanowski, David J.

> Subject: Clarification of 2.206 Questions

>

> Action Required:

> Recommendation:

>

> George,

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> Here is additional information that should help you respond to Mr. Quigley's comments on the Draft Director's Decision letter.

>

> 1st Paragraph:

> The concerned individual made the observation that the licensee's commitment to develop a monitoring plan for the Loop Stop Isolation Valves (LSIVs) is not being tracked in the site's Corrective Action Program. This observation is accurate; however, the commitment is being tracked in the "Action Tracking Module" of the Passport computer data base and was coded as a "Management Request (MREQ)" as noted by the concerned individual. The term "Corrective Action Program," as referenced in the Draft Director's Decision letter, was being used as a generic term for the site computer database. The "Corrective Action Program" is a different module than the "Action Tracking" module; however, both modules are part of the Passport computer database. Although the development of the LSIV monitoring program was initially being tracked as an MREQ, the Licensee has recoded this commitment as a "Regulatory Commitment (RCMT)," within the Action Tracking Module of Passport. The due date for completing this RCMT item is October 3, 2005.

> Last Sentence:

> The concerned individual made the observation that the statement: "the licensee has a loose parts monitoring and retrieval system," is incorrect. We concur that this statement is in error. There is a

loose parts monitoring system at Byron Station; however, there is no retrieval system. Guidance for operation of the Loose Parts Monitoring System and identification/determination of a loose part is given in procedure, BOP LM-5, "Loose Parts Monitoring System Operation and Alarm Response," and Byron Annunciator Response procedure, BAR 1-13-E9, "Loose Parts Monitoring System Trouble." The retrieval of a loose part would be addressed on a case-by-case basis depending on the size and location of the loose part.

- >
- > George, let me know if this is what you need.
- > Joe
- >
- > Joseph A. Bauer
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**CC:** <william.grundmann@exeloncorp.com>, <joseph.langan@exeloncorp.com>, <david.chrzanowski@exeloncorp.com>

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**Subject:** FW: Clarification of 2.206 Questions  
**Creation Date:** 9/28/05 3:35PM  
**From:** <joseph.bauer@exeloncorp.com>  
**Created By:** joseph.bauer@exeloncorp.com

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