

From: <erachp@comcast.net>
To: Dan Hoang <DVH@nrc.gov>
Date: Tue, May 9, 2006 11:18 AM
Subject: AMR review of section 3.3

Dan,

As I was reviewing section 3.3, Table 3.3.1, I came across some issues related to section 3.5. Hopefully you may have picked them up if you are done with your review. Otherwise, this may help.

1. Table 3.5.2.6, Bulk Commodities, component type fire hose reels, on page 3.5-74, credits fire protection program, and references table 3.5.1, line item 3.5.1-39. However, this line item only credits structures monitoring program and does not credit fire protection program.

I have also found issues where on Table 3.3.1, PNPS has stated that line item was not for Auxiliary system, but was addressed in section 3.5. I have identified the following questions, that I plan to ask PNPS.

2. Table 3.3.1, item 3.3.1-61, for elastomer fire barrier penetration seals exposed to air – outdoor or air - indoor uncontrolled. PNPS credits Fire Protection Program and states in the discussion column that this line item was not used in the auxiliary systems tables. Fire barrier seals are evaluated as structural components in Section 3.5. Cracking and the change in material properties of elastomer seals are managed by the Fire Protection Program.

However, in section 3.5, Table 3.5.2-6, Bulk Commodities, on pages 3.5-82, and 3.5-83, where line item 3.3.1-61 is referenced, PNPS credits the Fire Protection Program and the Structures Monitoring program. However, line item 3.3.1-61 does not credit structures monitoring program. As a matter of fact, the Structures Monitoring Program is enhanced to add guidance for inspection of elastomer seals, etc. Please clarify if both programs are credited for managing aging effects for penetration seals as stated in Table 3.5.2-6, and if so, please supplement the LRA to include the Structures Monitoring program in Table 3.3.1, item 3.3.1-61.

Erach

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