

**From:** "wilbur jackson" <JacksonWR@msn.com>  
**To:** "James Davis" <JAD@nrc.gov>, "Peter Wen" <PXW@nrc.gov>  
**Date:** Tue, Jun 27, 2006 1:10 PM  
**Subject:** PNPS Response for AMR Items 460 and 512 -- Potential Conflict in the Responses

Jim & Peter --

In working on the AMR Audit Report write up, I noted a potential conflict created by the applicant's response to LR Item # 460 (my question 3.1.1-J-16) and Item # 512 (my question 3.1.1-J-31);

In response to my question, item # 460, the applicant says that there are no lines in the 3.1.2-X tables for (carbon) steel components that rollup to Item 3.1.1-48. The applicant states that PNPS will amend the LRA to delete the statement, "Cracking in steel components due to thermal and mechanical loading is not directly dependent on water chemistry, so only the One-Time Inspection Program is credited."

In response to my question, item # 512, the applicant says that the LRA will be clarified to show that cracking is an aging effect requiring management for Class 1 carbon steel piping components < 4" at PNPS and that the appropriate aging management programs include the ISI program. The applicant also states that the credited aging management programs will be the same as those listed for the NUREG-1801 line items corresponding to LRA Table 3.1.1, Item 48.

The potential conflict occurs because the #460 response says that there are no carbon steel components rolling up to Item 3.1.1-48. However, the #512 response says that the LRA will be clarified to show that cracking is an aging effect requiring management for Class 1 carbon steel piping components < 4" NPS.

Since the #512 response is the one most recently reviewed and accepted by me, I am expecting that the applicant's revision to the LRA will be consistent with that response. I do not consider the LRA change described in the #460 response to be necessary. (It would not be wrong; but it is not necessary.) However, I do consider the opening premise of that response (that no carbon steel lines roll up to 3.1.1-48) to be contradicted by the response to #512. I find the response to #512 still to be acceptable.

I recommend that you make the applicant aware of this potential conflict before they send the final Q&A e-mail.

Thanks,

Bob Jackson

**CC:** "Erach Patel" <erachp@comcast.net>

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**From:** "wilbur jackson" <JacksonWR@msn.com>  
**Created By:** JacksonWR@msn.com

**Recipients**

nrc.gov  
 OWGWPO03.HQGWDO01  
 JAD (James Davis)

nrc.gov  
 TWGWPO04.HQGWDO01  
 PXW (Peter Wen)

comcast.net  
 erachp CC (Erach Patel)

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