

From: <erachp@comcast.net>
To: Peter Wen <pxw@nrc.gov>, Jim Davis <jad@nrc.gov>
Date: Thu, May 4, 2006 10:14 AM
Subject: AMP questions

Peter/Jim,

I have revised my AMP question list to add one more question for the One-Time Inspection program, which is shown as bold. It is question 2.

Thanks.

Erach

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Creation Date Thu, May 4, 2006 10:14 AM
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Pilgrim Nuclear Power Station

Questions for the AMP site audit visit from Erach Patel

I. AMP B.1.13.1 - Fire Protection

1. Provide justification why carbon dioxide fire suppression system is not subject to aging management review.
2. The exception taken for element 4 about the inspection frequency for penetration seals should also apply to element 3 for the same reason that it applies to element 4. Please justify why this exception does not apply to element 3.
3. The two enhancements identified in B.1.13.1 write-up are not included in the FSAR Supplement Appendix A.1.13. NUREG-1800, SRP for license renewal, section 3.X.3.4, FSAR Supplement, states the following:

As noted in Table 3.X-2, an applicant need not incorporate the implementation schedule into its FSAR. However, the reviewer should confirm that the applicant has identified and committed in the license renewal application to any future aging management activities, including enhancements and commitments to be completed before entering the period of extended operation. The staff expects to impose a license condition on any renewed license to ensure that the applicant will complete these activities no later than the committed date.

The enhancements should be included in the Appendix A write-up.

2. AMP B.1.13.2 - Fire Water System

1. NUREG-1800, SRP for license renewal, section 3.X.3.4, FSAR Supplement, states the following:

As noted in Table 3.X-2, an applicant need not incorporate the implementation schedule into its FSAR. However, the reviewer should confirm that the applicant has identified and committed in the license renewal application to any future aging management activities, including enhancements and commitments to be completed before entering the period of extended operation. The staff expects to impose a license condition on any renewed license to ensure that the applicant will complete these activities no later than the committed date.

- a) The enhancement for wall thickness evaluation of fire protection piping is identified in the Appendix A write-up in the present tense, meaning the inspections are being performed. However, the enhancement is addressed in the Appendix B write-up is in the future tense, meaning the inspections will be performed in the future (before the end of the current operating term). The Appendix A write-up should be revised to address this future commitment.
- b) The enhancement for revising procedures to include inspections of hose reels for corrosion is not addressed in the Appendix A write-up. The Appendix A write-up should be revised to address this future commitment.

3. AMP B.1.12 - Fatigue Monitoring

1. FSAR Supplement section A.2.1.12 references section 4.2.6 for location of the transient cycles that are tracked by this program. However, section 4.2.6 addresses RPV Axial Weld Failure Probability. Should section 4.3.1, Table 4.3-2 be referenced instead?

4. AMP B.1.23 - One-Time Inspection

1. Please provide a list of systems in element of "Scope of Activity", where One-Time Inspection will be performed.

2. Please identify how the sample of small piping welds, 4" and smaller will be picked for performing NDE inspection.

3. NUREG-1800, SRP for license renewal, section 3.X.3.4, FSAR Supplement, states the following:

As noted in Table 3.X-2, an applicant need not incorporate the implementation schedule into its FSAR. However, the reviewer should confirm that the applicant has identified and committed in the license renewal application to any future aging management activities, including enhancements and commitments to be completed before entering the period of extended operation. The staff expects to impose a license condition on any renewed license to ensure that the applicant will complete these activities no later than the committed date.

The One-Time Inspection program is a new program that will be implemented prior to period of extended operation. Please justify why this commitment is not included in the FSAR Supplement write-up in Appendix A.1.25.

5. AMP B.1.32.1 - Water Chemistry Control - Auxiliary Systems

1. Per SRP Appendix A1, section A1.2.3.4, the frequency of sampling water chemistry should be identified. PNPS Appendix B.1.32-1, element 4 does not identify the frequency. Please identify the frequency.

6. AMP B.1.32.3 - Water Chemistry Control - Closed Cycle Cooling Water

1. The exception taken for element 4 about the performance and functional testing should also apply to element 3 for the same reason that it applies to element 4. Please justify why this exception does not apply to element 3.