

From: "wilbur jackson" <JacksonWR@msn.com>
To: "James Davis" <JAD@nrc.gov>, "Peter Wen" <PXW@nrc.gov>
Date: 06/27/2006 1:10:54 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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Subject: PNPS Response for AMR Items 460 and 512 -- Potential Conflict in the Responses
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Files	Size	Date & Time
MESSAGE	2042	06/27/2006 1:10:01 PM
TEXT.htm	3112	
Mime.822	7279	

Options

Expiration Date: None
Priority: Standard
ReplyRequested: No
Return Notification: None

Concealed Subject: No
Security: Standard

Junk Mail Handling Evaluation Results

Message is eligible for Junk Mail handling
 This message was not classified as Junk Mail

Junk Mail settings when this message was delivered

Junk Mail handling disabled by User

Junk Mail handling disabled by Administrator

Junk List is not enabled

Junk Mail using personal address books is not enabled

Block List is not enabled