From:

James Davis

To:

Mark Orr

Date:

07/05/2006 5:03:04 PM

Subject:

Comments on the AMP writeup.

Mark,

Attached are my comments on the AMP audit writeup.

Jim

Mail Envelope Properties (44AC2908.1BB: 22: 35346)

Subject:

Comments on the AMP writeup.

Creation Date

07/05/2006 5:03:04 PM

From:

James Davis

Created By:

JAD@nrc.gov

Recipients

Action

Date & Time

atlintl.com

Transferred

07/05/2006 5:04:02

PM

MPOrr (Mark Orr)

Post Office

Delivered

Route

atlintl.com

Files

Size

Date & Time

MESSAGE

419

07/05/2006 5:03:04 PM

Pilgrim AMP report comment form.wpd

27638

07/05/2006 5:00:10

PM

Options

Auto Delete:

No

Expiration Date:

None

Notify Recipients:

Yes

Priority:

Standard

ReplyRequested:

No

Return Notification:

None

Concealed Subject:

No

Security:

Standard

To Be Delivered:

Immediate

Status Tracking:

Delivered & Opened

Document Review Comment Form

Document Title:

Audit and Review Report for Plant Aging Management Reviews and Programs

for Pilgrim Nuclear Power Station

Area of Review:

Aging Management Audit Report Section 1. "Introduction and General Information" to Section

3.0.3.3.6.3 "Conclusion."

Reviewer Guidelines:

1. Review for specific area of responsibility and/or expertise.

2. Direct comments to the actions within the scope of the document.

 Record comment on this form. List page number and line number from document to identify location of proposed change. If comment is extensive or you have marked-up the document, make a notation on this form (e.g., "See comments on markup copy of document.") and return both this form and the marked-up document to the comment coordinator.

4. If information is technically correct, do not change because of personal style preference. You may, however, indicate clearer or more concise wording.

5. If you consider the comment critical and require that you review the revised document before it is approved, put a "Y" in the "Critical Comment" box.

| Comment | Page | Line | Comment | Critical | Comment Resolution |
|---------|------|-------|---|----------|--------------------|
| No. | No. | No. | | Comment? | |
| 1 | 64 | 19-26 | The entire paragraph needs to be removed. It is | Yes | |
| | | | discussing the ISI program. | | |

| 2 | 65 | 18-19 | Remove these lines and replace them with the | Yes | |
|---|-----|-------|---|-----|------------|
| 2 | 65 | 16-19 | | 163 | |
| | | | following: In the past 5 years there has been | | |
| | l | | limited experience with the inspection of buried | | |
| | į. | j | piping at PNPS. This experience has occurred | | |
| | 1 | | mainly on the fire water underground distribution | | i |
| | | 1 | system. This system is approximately 35 years old | | |
| | 1 | ì | and consists of cement lined malleable iron pipe | | |
| | | ł | with mechanical joints. There has been no | | |
| | 1 | 1 | history of significant leaks other than during two | | |
| | 1 | | instances, one in 2001 and one in 2005. In the first | | |
| | 1 | | event the 8" underground line down stream of | | |
| | 1 | ĺ | 8-L-22 failed. The probable cause of failure was | | · i |
| | | | most likely induced by minor fabrication anomalies | | |
| | | | | | |
| | 1 | l | compounded by marginal installation techniques. | |) . |
| | | | When this piping was examined it was found to be | | İ |
| | | | overall in very good condition externally except for | | |
| | 1 | l | a small area of surface corrosion, attributed to | | 1 |
| | | | marginal installation techniques. In the second | | 1 |
| | 1 | | event the 8" underground pipe failed in the area of | | |
| | | ĺ | the N2 tank adjacent to the EDG building. Due to | | |
| | l | l : | congestion and the presence of the tank, which | | |
| j | | | was installed subsequent to the installation of the piping, it | | ! |
| | 1 | ł | was not possible to dig up the piping to examine it and | | |
| | 1 | \ | determine the cause of the failure but may be related to the | | 1 |
| | | | installation of the tank. In addition to these two instances there | | Ì |
| | | | have been a number of valves excavated during maintenance which found the valves and piping to be in remarkably good | | |
| | 1 | 1 | condition. | | |
| | | | ooridizori. | | |
| | | | From an additional historical perspective, the salt service | | |
| | | | water (SSW) system at PNPS has experienced leaks on the | | |
| | | | buried inlet (screenhouse to auxiliary bays) piping as a result | | |
| | | Ì | of internal corrosion. The original piping material was rubber | | |
| | | | lined carbon steel wrapped with reinforced fiberglass wrapping and coal tar saturated felt and heavy Kraft paper. The leaks | | |
| | 1 : | | were determined to be the result of the degraded rubber lining | | |
| | | | being in contact with sea water. These pipes have since been | | |
| | | | replaced with unlined Titanium wrapped with the same external | | |
| | 1 | | coating as the original pipe. This pipe replacement | | 1 |

| 2 cont. | | | occurred in 1995 and 1997. In addition, the SSW buried discharge piping (also rubber lined carbon steel with external pipe wrapping, same as Inlet piping) from the auxiliary bays to the discharge canal also experienced severe internal corrosion due to failure of the nubber lining. Two 40' lengths of 22' diameter pipes (one on each loop) were replaced in 1999 as a result of the failed nubber lining and internal corrosion. These spools were replaced with carbon steel coated internally and externally with an epoxy coating. The piping that was removed was examined after its wrapping was removed and its external surface was found to be in good condition. Since that time, the entire length of both SSW buried discharge loops have been lined internally with cured-in-place pipe linings, "B' Loop in 2001 and "A" Loop in 2003. The phased array inspection technique, was provided merely as an example of a potential future examination technique. It and other remote techniques will potentially be able to assess the condition of extensive portions of buried piping without the need for excavation. This exception was taken to allow the potential use of this technique or others in lieu of excavating piping in order to provide a more effective assessment of overall piping condition while eliminating the potential for damaging the piping during excavation. | | |
|---------|----------|----------|--|-----|-------------|
| | | l | | | |
| 3 | 68 | 22 | Remove the highlighted text | Yes | |
| 4 | 68 | 24 | Replace "review" with "reviewed" | | |
| 5 | 69 | 28 | Remove the hard return | | |
| 6 | 72 | 1 | Remove extra spaces at the start of the line. | | |
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