

## PRE-INSPECTION COVER SHEET AND INSPECTION PLAN

### INSPECTORS:

Lead: Glenn Meyer FACILITY: Pilgrim Nuclear Generating Station

Other: Suresh Chaudhary REPORT NO: 05000293/2006007

Dante Johnson

Paul Kaufman

Shani Lewis

Tim O'Hara

John Richmond

REPORT TYPE: TEAM REPORT

INSP DATES: 9/18-22, 10/2-6

EXIT DATE: 11/TBD

### INSPECTION PLAN ATTACHED

### INSPECTION PROCEDURE DATA

<u>Procedure-Occ. Nos</u>	<u>IPE Code</u>	<u>Title of Procedure</u>	<u>On MIP (Y/N)</u>
<u>-</u>	<u></u>	<u></u>	<u></u>
<u>-</u>	<u></u>	<u></u>	<u></u>
<u>-</u>	<u></u>	<u></u>	<u></u>

### IFS ITEMS ASSIGNED FOR REVIEW

<u>Procedure-Occ. Nos</u>	<u>IPE Code</u>	<u>IFS Number</u>	<u>Brief Description</u>
<u>NA -</u>	<u>RI</u>	<u></u>	<u></u>
<u>-</u>	<u>RI</u>	<u></u>	<u></u>
<u>-</u>	<u>RI</u>	<u></u>	<u></u>

### ALLEGATIONS ASSIGNED FOR REVIEW

<u>Procedure-Occ. Nos</u>	<u>IPE Code</u>	<u>ALG Number</u>	<u>Brief Description</u>
<u>NA - 26</u>	<u>AF</u>	<u></u>	<u></u>
<u>- 26</u>	<u>AF</u>	<u></u>	<u></u>
<u>- 26</u>	<u>AF</u>	<u></u>	<u></u>

PROJECTS COORDINATION: Date Discussed with DRP Section Chief:

COORDINATED: /s/ T. Walker ACKNOWLEDGED:  APPROVED: /s/ D. Jackson  
(DRP) (Accomp. Insp. Super.) (Inspector's Supervisor)

### ARRANGEMENTS:

Hotel: Hilton Garden Inn Phone: ( 508) 830-0200

Contact: Fred Mogelesko, Entergy LR Proj. Mgr. Phone: ( 508) 830-7832

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SUNSI Review Complete: DEJ (Reviewer's Initials)

# **LICENSE RENEWAL INSPECTION PLAN FOR PILGRIM NUCLEAR GENERATION STATION**

## **I PURPOSE**

This plan specifies areas that must be inspected in order to assure the thoroughness and accuracy of the screening and scoping of non-safety related structures, systems, and components, as required in 10 CFR 54.4(a)(2) and to assure aging management programs are capable of managing the identified aging affect in a reasonable manner. This inspection plan describes how Manual Chapter 2516 requirements for activities relating to 10 CFR Part 54 will be inspected. This plan defines the scope of the inspections planned to verify that Entergy's license renewal program for the Pilgrim Nuclear Generating Station is in compliance with the requirements of the rule and is consistent with the license renewal application and the staff's safety evaluation of Entergy's license renewal application. The plan also provides guidance for inspection scheduling, inspector training, inspection activities, and resource requirements.

Entergy's license renewal application identified the systems and structures that Entergy had determined were within the scope of the rule.

## **II OBJECTIVES**

The overall objective of this plan is to provide guidance for inspecting the implementation and effectiveness of the programs and activities associated with Entergy's license renewal program. The inspection will verify there is reasonable assurance that the effects of aging will be adequately managed so that the intended function(s) of structures, and components, for which an aging management review is required, will be maintained consistent with the current licensing basis during the period of extended operation. Region I will implement the license renewal inspection plan at Pilgrim before NRR approves Entergy's license renewal application to verify that Entergy meets the requirements of the rule and has implemented license renewal programs and activities consistent with the rule, the license renewal application, and the staff's safety evaluation report on the license renewal application.

## **III INSPECTION ACTIVITIES**

Inspection Procedure (IP) 71002, "License Renewal Inspections," will be the primary procedure used to inspect Pilgrim Nuclear Generating Station's implementation of the requirements of the rule. The latest revision of IP 71002 can be reviewed by accessing <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/ip71002.pdf>

Scoping and Screening The inspection will focus on the methodology used by the applicant to determine which non-safety systems are within the scope of the license renewal. This will be accomplished by walk-downs of accessible portions of selected systems and structures to identify observable inconsistencies in the scoping and screening activities. Any aging effects on the systems and structures that are not covered in the license renewal application will be noted for inclusion in the Aging Management portion of the inspection.

Aging Management Review Aging effects identified by Entergy will be principally reviewed and evaluated during the NRR technical review and on-site audit. As part of an aging management program inspection, the regional inspection team will perform a sample review of related maintenance records of the selected systems and structures in an attempt to identify any previously unrecognized aging.

Aging Management Programs The inspection team will inspect the aging management programs, including aging management programs where Entergy claims they are consistent with the Generic Aging Lessons Learned report, for important aging effects in selected systems and structures. The inspection team will examine records for existing aging management programs to evaluate the programs' effectiveness and will review plans for new aging management programs. The inspection team will then document the team's findings on the effectiveness of the aging management programs to maintain the systems' and structures' intended function(s) consistent with the current licensing basis for the period of extended operation.

#### IV INSPECTION SCOPE

The Pilgrim license renewal inspection activities will be implemented through an on-site inspection.

1. The inspection will last two weeks. One inspection man-week will focus on the scoping and screening processes as it relates to non-safety systems that affect safety systems. The inspection will verify non-safety systems have been included or excluded consistent with the rule, methodology, and the staff's evaluation of Entergy's methodology. The inspection will verify there is reasonable assurance that Entergy's scoping and screening processes have identified the non-safety systems, structures, and components for which an aging management review is required consistent with the requirements of the rule.
2. The remainder of the inspection resources will focus on the aging management programs designated in the Entergy application. This inspection will examine a sample of existing and proposed aging management programs and compare the programs against actual past results.
2. If open inspection items warrant a third inspection week, the team will followup on previous inspection activities and may inspect Entergy actions on any safety evaluation open items requested by NRR. This inspection may also include portions of the license renewal application updated by the applicant as a result of recent plant modifications. The scope of any third inspection week (and, thus, the resources) will depend on how many open issues remain from the previous inspection activities.

#### V INSPECTION RESOURCES

The inspection is expected to have the following inspection resources:

1. Inspectors
  - C One team leader - Glenn Meyer
  - C Six inspectors - Chaudhary, D. Johnson, Kaufman, Lewis, O'Hara, and Richmond
  - Region II inspector for familiarization purposes - B. Miller
2. Skills

The inspection team has a cross-section of skills, including mechanical, material, civil/structural, and electrical engineering skills.

## VI AGING MANAGEMENT PROGRAMS

The inspectors will sample from the following aging management programs (AMPs), which are either explicitly provided in a separate AMP or included as part of another AMP:

- Water Chemistry
- Flow-Accelerated Corrosion
- Fuel Oil Chemistry
- 10 CFR Part 50, Appendix J
- Closed Cycle Cooling Water System
- ASME, Section XI, Subsection IWE
- TLAA, Drywell Corrosion and Protective Coating Monitoring and Maintenance Program
- Buried Piping Inspection
- Aboveground Outdoor Tanks
- Fire Protection
- Fire Water System
- Electrical Cables and Connections Not Subject to EQ
- Electrical Cables and Connections Not Subject to EQ Used in Instrumentation Circuits
- Inaccessible Medium Voltage Cables Not Subject to EQ
- Standby Liquid Control System
- Feedwater System
- Core Spray System
- Isolation Condenser System
- Component Supports Commodity Group
- Fire Protection
- Fire Water System
- Electrical Cables & Connectors not subject to 10CFR50.49 Env. Qual
- Electrical Cables & Connectors not subject to 10CFR50.49 Env. Qual, Requirements used in Instrument Circuits
- Inassessible Medium Voltage Cables not subject to 10CFR50.49 Env. Qual Requirements
- Masonry Wall Program
- Structures Monitoring Program
- Protective Coating Monitoring and Maintenance
- ASME Section XI, Subsection IWF

Various plant systems will be evaluated for the purposes of reviewing the AMPs.

## VII Contact

The Entergy project manager for license renewal is Fred Mogolesko, who can be reached at 508-830-7832.