

November 2, 2006

Mr. Michael Kansler  
President  
Entergy Nuclear Operations, Inc.  
440 Hamilton Avenue  
White Plains, NY 10601-1839

SUBJECT: REQUESTS FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE  
PILGRIM NUCLEAR POWER STATION LICENSE RENEWAL APPLICATION  
(TAC MC9669)

Dear Mr. Kansler:

By letter dated January 25, 2006, Entergy Nuclear Operations, Inc. submitted an application pursuant to 10 CFR Part 54, to renew the operating license for Pilgrim Nuclear Power Station for review by the U.S. Nuclear Regulatory Commission (NRC). The NRC staff is reviewing the information contained in the license renewal application (LRA) and has identified, in the enclosure, an area where additional information is needed to complete the review. Specifically, the enclosed request for additional information is from the NRC Project Team that performed the aging management program, aging management review, and time-limited aging analysis (TLAA) audits at PNPS.

This issue was discussed with a member of your staff, Bryan Ford, and a mutually agreeable date for this response is within 30 days from the date of this letter. If you have any questions, please contact me at 301-415-1383 or e-mail [phb1@nrc.gov](mailto:phb1@nrc.gov).

Sincerely,

**/RA/**

Perry Buckberg, Project Manager  
License Renewal Branch A  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket No. 50-293

Enclosure:  
As Stated

cc w/encl: See next page

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License Renewal Branch A  
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DATE	10/20/06	10/19/06	10/18/06	11/2/06	10/19/06

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Letter to Michael Kansler from Perry Buckberg dated: November 2, 2006

SUBJECT: REQUESTS FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE  
PILGRIM NUCLEAR POWER STATION LICENSE RENEWAL APPLICATION  
(TAC MC9669)

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DLR R/F

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Pilgrim Nuclear Power Station

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Duxbury Free Library  
ATTN: Ms. Elaine Winquist  
77 Alden Street  
Duxbury, MA 02332

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ATTN: Reference Librarian  
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Kingston, MA 02364

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**REQUESTS FOR ADDITIONAL INFORMATION (RAIs)  
PILGRIM NUCLEAR POWER STATION  
LICENSE RENEWAL APPLICATION SECTIONS  
3.6 ELECTRICAL AND INSTRUMENTATION AND CONTROLS**

**3.6 Electrical and Instrumentation and Controls**

**RAI 3.6.2-1**

In RAI 3.6.2-1, by letter dated August 14, 2006, the staff requested the applicant to provide a basis document including an aging management program (AMP) for cable connections with the 10 elements or provide a justification for why an AMP is not necessary.

In your response, by letter dated September 13, 2006, you stated that electrical cable connections at PNPS are inspected under the maintenance rule program as directed by Entergy procedures and therefore no aging management program (AMP) for license renewal is required at PNPS.

It should be noted that the current licensing bases for all power plants require compliance with the requirements of the maintenance rule 10 CFR 50.65. The Statements of Consideration for the license renewal rule state: The license renewal rule excludes “active, short-lived structures and components” from an aging management review because of the existing regulatory process, existing licensee programs and activities, and the maintenance rule. The staff’s understanding has been that under the license renewal rule, existing programs are not, without some explanation or modification, automatically considered adequate to manage aging effects for license renewal by virtue of being part of the current licensing basis. The Commission formulated the following two principles of license renewal: (1) With the possible exception of the detrimental effects of aging on the functionality of certain plant systems, structures, and components in the period of extended operation and possibly a few other issues related to safety only during extended operation, the regulatory process is adequate to ensure that the licensing bases of all currently operating plants provides and maintains an acceptable level of safety so that operation will not be inimical to public health and safety or common defense and security; and (2) The plant-specific licensing basis must be maintained during the renewal term in the same manner and to the same extent as during the original licensing term.

The 10 CFR 50.24 (a)(3) requires an applicant to demonstrate that the effects of aging, of components such as cable connections defined in 10 CFR 50.24 (a)(1), will be adequately managed so that the intended function(s) will be maintained consistent with the CLB for the period of extended operation. To demonstrate that the effects of aging will be adequately managed for license renewal, the staff views that an applicant must identify the program relied upon to manage certain aging effects for cable connections. The aging management program for cable connections acceptable to the staff is provided in GALL AMP XI.E6. This AMP states that the aging management program for electrical cable connections (metallic parts) account for the following stressors: thermal cycling, ohmic heating, electrical transients, vibration, chemical contamination, corrosion, and oxidation.

ENCLOSURE

Therefore, the staff requests that the applicant either provide a plant-specific AMP with the AMP elements found in SRP-LR, Appendix A.1, Section A.1.2.3 and SRP-LR Table A.1-1 or an AMP consistent with GALL AMP XI.E6. If you still insist an AMP is not required, explain in detail how the existing program will address the above aging effects and provide a detailed discussion of how each of the 10 elements of the program as described in the SRP sections mentioned above is met by the current program. Also, provide supporting documentation to show that the aging management program elements including appropriate tests are implemented currently and will be continued for the extended period of operation. Without such information, it is not apparent that the staff will be able to present a basis for concluding that actions have been or will be taken to manage the effects of aging during the period of extended operation to ensure the functionality of those structures and components.

ENCLOSURE