

NPA - PD - LR

From: Ram Subbaratnam
To: erachp@comcast.net
Date: 8/21/2006 9:36:06 AM
Subject: RAIs from Audit by Danhoang & Erach

Erach:

Here is the RAI as it was issued.

Thanks.

Ram Subbaratnam
PM Pilgrim LRA
415-1478

CC: Dan Hoang; James Davis

Mail Envelope Properties (44E9B6C6.98C : 19 : 10294)**Subject:** RAIs from Audit by Danhoang & Erach**Creation Date** 8/21/2006 9:36:06 AM**From:** Ram Subbaratnam**Created By:** RXS2@nrc.gov**Recipients**

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erachp (erachp@comcast.net)**Action****Date & Time**

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JAD CC (James Davis)

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MESSAGE

546

8/21/2006 9:36:06 AM

EEEBSection3.6RAIsFinal.wpd

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8/18/2006 6:31:38

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

August 14, 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. (Entergy or the applicant), 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 and has identified, in the enclosure, areas where additional information is needed to complete the review. These relate to Section 3.5 Structures and Component Supports and 3.6 Electrical and Instrumentation and Control Systems.

These questions were 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 301-415-1478 or e-mail RXS2@nrc.gov.

Sincerely,

/RA/

Ram Subbaratnam, Project Manager
License Renewal Branch A
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-293

Enclosure:
Requests for Additional Information

cc w/encl: See next page

August 14, 2006

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/RA/

Ram Subbaratnam, Project Manager
License Renewal Branch A
Division of License Renewal
Office of Nuclear Reactor Regulation

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Requests for Additional Information

cc w/encl: See next page

ADAMS Accession No.: **ML062290474**

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OFFICE	PM:RLRA:DLR	LA::DLR	BC:RLRA:DLR
NAME	RSubbaratnam	IKing	Llund (RAuluck)
DATE	8/ /06	8/ 14 /06	8/ 14 /06

OFFICIAL RECORD COPY

Letter to Michael Kansler from Ram Subbaratnam dated August 14, 2006

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PILGRIM NUCLEAR POWER STATION LICENSE RENEWAL APPLICATION
(TAC MC9669)

HARD COPY

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Pilgrim Nuclear Power Station

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Plymouth Public Library
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Plymouth, MA 02360

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

Kingston Public Library
ATTN: Reference Librarian
6 Green Street
Kingston, MA 02364

Ms. Mary Lampert
Duxbury Nuclear Advisory, Chair
Pilgrim watch, Director
148 Washington Street
Duxbury 02332

1 REQUESTS FOR ADDITIONAL INFORMATION
PILGRIM NUCLEAR POWER STATION
LICENSE RENEWAL APPLICATION
SECTIONS 3.5 STRUCTURES AND COMPONENT SUPPORTS AND
3.6 ELECTRICAL AND INSTRUMENTATION AND CONTROL SYSTEMS

RAI 3.6.2-1

In the license renewal application (LRA), Table 3.6.2-1, under Cable connections (metallic parts), the applicant did not indicate any aging effects and does not credit an aging management program (AMP). In the LRA Table 3.6.1 - Electrical Component under discussion of cable connection metallic parts, the applicant stated that cable connections outside of active devices are taped or sleeved for protection and states operating experience with metallic parts of electrical cable connections at Pilgrim Nuclear Power Station or (PNPS or Pilgrim) does not indicate any aging effects requiring management. Electrical cable connections (metallic parts) are subject to aging effects which include thermal cycling, ohmic heating, electrical transients, vibration, chemical contamination, corrosion, and oxidation. NUREG-1801, Revision 1, AMP XI.E6, "Electrical Cable Connection not Subject to 10 CFR 50.49 Environmental Qualification Requirements," typically include connections associated with cables to be within the scope of license renewal and credits the above AMP. Please clarify how you propose to manage cable connection components during the license extension for the aging effects they are subjected to, or propose a suitable AMP that will manage effects. Please also evaluate them for any plant specific operating experience at Pilgrim. If Entergy evaluates otherwise, please provide justification for why the above generic aging lessons learned recommended program need not be credited.

RAI 3.5.1-1

In LRA Table 3.5.2-6, PNPS has identified 30 line items that reference Table 3.5.1, item 3.5.1-39. For two of these line items, the LRA stated that loss of material of carbon steel fire hose reels and damper framing exposed to a "protected from weather" environment is managed using the Fire Protection Program. For the other 28 line items the LRA credited the Structures Monitoring Program for managing the aging effects of loss of material. However, the discussion column of LRA Table 3.5.1, line item 3.5.1-39 credits only the Structures Monitoring Program, and does not credit the Fire Protection Program. Furthermore, LRA Appendix B.1.13.1, Fire Protection Program description does not address hose reels or damper framing, but LRA Appendix B.1.13.2, Fire Water System Program description includes valves (dampers), and an enhancement to include inspection of hose reels.

Please clarify which is the correct program, Fire Protection or Fire Water System that should have been credited in LRA Table 3.5.2-6 for aging management of fire hose reels and damper housing; and justify why this program is not credited in the discussion column of LRA Table 3.5.1, item 3.5.1-39 or revise the LRA to include this program.

Enclosure

RAI 3.5.1-2

In the discussion column of LRA Table 3.5.1, line item 3.5.1-45, PNPS stated that abrasion and cavitation due to flowing water is insignificant, nonetheless, the Structures Monitoring Program will confirm the absence of aging effects for PNPS group 6 concrete structures. However, there is no line item in any of the AMR results Tables 3.5.2-X where the LRA Table 3.5.1 line item 3.5.1-45 is referenced.

Please justify why there is no line item in LRA Tables 3.5.2-X where the LRA Table 3.5.1 line item 3.5.1-45 is referenced or revise the LRA to include this reference.