

(PA) PA-LR

From: Ram Subbaratnam
To: bford@entergy.com
Date: 7/10/2006 2:51:46 PM
Subject: Fwd: Response to your question regarding Radwaste Piping

Some of "Your Own" rationale for why Radwaste system should be included in the scope of renewal space is as follows:

Ram Subbaratnam
PM Pilgrim LRA
US NRC, (301) 415 1478

>>> Kim Green <kim@islin.com> 07/06/2006 11:49 AM >>>
Devender,

In response to your question regarding whether radwaste piping is in scope, ISL provides the following answer and supporting information:

Pilgrim UFSAR Section 9.2.4.3.2 states:

"The Miscellaneous Waste System processes and strains these liquid wastes before discharge through the radwaste discharge header into the circulating water discharge canal or batched to floor drain to process as chemical waste. The liquid wastes are sampled and analyzed before release and continually monitored during release."

Pilgrim UFSAR Section 9.2.4.3.3 also states:

"The wastes are pumped through a strainer and discharged at a controlled rate through the liquid radwaste discharge header into the circulating water discharge canal or batched to floor drain to process as chemical waste. The miscellaneous waste is continuously monitored for activity as it passes through the radwaste discharge header. If necessary, miscellaneous wastes of high radioactivity concentrations and low detergent levels may be transferred to the chemical waste receiver tank for further processing."

Pilgrim LRA Section 2.3.3.14 and Table 2.3.3.14-A indicate that the radwaste system is in scope for the purposes of 10 CFR 54.4(a)(2) for spatial interaction.

Page 2.3-65 of the Pilgrim LRA states:

>Unless specifically excluded, all nonsafety-related components in a system
>determined to be in
>scope for 54.4(a)(2) for spatial interaction are subject to AMR.
>Components are excluded from
>review if their location is such that safety-related equipment cannot be
>impacted by component
>failure. Specific areas and components excluded for spatial interaction
>are listed in
>Table 2.3.3.14-B.

The radwaste system or any portion thereof is NOT listed in LRA Table

2.3.3.14-B. Therefore, it is ISL's determination that the radwaste discharge piping of concern is in scope and subject to an AMR.

Furthermore, Pilgrim LRA Section 2.4.5, Yard Structures, indicates that the discharge structure is in scope.

"The purpose of the discharge structure is to provide a flow path from the circulating water system and the salt service water system back to the bay. The discharge structure is located near the shoreline, northwest of the intake structure.

The structure is classified as nonsafety-related and is not a seismic Class I structure.

The discharge structure is part of the salt service water system flow path to the ultimate heat sink."

Remaining yard structures have the following intended functions for 10 CFR 54.4(a)(1), (a)(2), and (a)(3).

- Provide support, shelter and protection for safety-related equipment and nonsafetyrelated equipment within the scope of license renewal. Yard structures house and support equipment credited for station blackout (10 CFR 50.63) and for fire protection (10 CFR 50.48).

- Maintain integrity of the SSW discharge flow path (discharge structure and channel). The SSW system is credited for fire protection (10 CFR 50.48).

If you have any questions, or need further information or assistance regarding this matter, please call me at 301-255-2289, or Cliff Marks at 301-255-2264.

Hope this helps.
Kim

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