

## Michael Modes - Additional Inspection Items

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**From:** Michael Modes  
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**Date:** 01/12/2007 8:27 AM  
**Subject:** Additional Inspection Items  
**CC:** Conte, Richard; dmannai@nrc.gov; Meyer, Glenn; Tifft, Douglas

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We have been asked, by the Balance-of-Plant branch in NRR, to look at the following items (Doug Tifft, who originally was going to observe, is now going to inspect these items with Glenn Meyer's help, please call Doug at 610.337.6918):

### 2.3.3.2.a Service Water System

#### Inspection Item 2.3.3.2.a-1

License renewal drawing LRA-G-191159-SH-01-0, at location H-11, depicts pipe section 2"-SW-566C within the scope of license renewal. The license renewal boundary flag for 2"-SW-566C is located on an unisolable section of pipe. The actual location of the license renewal scope boundary for this pipe section is not clear. Perform an inspection to ensure that the license renewal scope boundary for this pipe section satisfy the applicable requirements of 10CFR 54.4(a)(2).

#### Inspection Item 2.3.3.2.a-2

LRA section 2.1.2.1.2 (page 2.1-12) states in part "Nonsafety-related piping systems connected to safety-related systems were included up to the structural boundary or to a point that includes an adequate portion of the nonsafety-related piping run to conservatively include the first seismic or equivalent anchor" and "If isometric drawings were not readily available to identify the structural boundary, connected lines were included to a point beyond the safety/nonsafety interface, such as a base-mounted component, flexible connection, or the end of a piping run (such as a drain line)." The following are license renewal boundaries located at safety/nonsafety class breaks. It is not clear that the nonsafety-related piping systems were included up to the structural boundary or to a point that includes an adequate portion of the nonsafety-related piping run to include the first seismic or equivalent anchor. Perform an inspection to ensure that the license renewal scope boundary for these pipe sections satisfy the applicable requirements of 10CFR 54.4(a)(2).

- a) LR drawing LRA-G-191159-SH-02-0, location E-8, downstream of valve 419.
- b) LR drawing LRA-G-191159-SH-02-0, location E-7, downstream of valve 418.
- c) LR drawing LRA-G-191159-SH-02-0, location E-7, downstream of valve 18.
- d) LR drawing LRA-G-191159-SH-02-0, location C-3, downstream of valve 203.
- e) LR drawing LRA-G-191159-SH-02-0, location J-3, downstream of valve 206.
- f) LR drawing LRA-G-191159-SH-01-0, location E-10, downstream of valve 302.
- g) LR drawing LRA-G-191159-SH-01-0, location D-11, downstream of valve 23C.
- h) LR drawing LRA-G-191159-SH-01-0, location F-13, downstream of valve 22C.
- i) LR drawing LRA-G-191159-SH-01-0, location F-14, downstream of valve 22D.
- j) LR drawing LRA-G-191159-SH-01-0, location H-11, downstream of valve 20.
- k) LR drawing LRA-G-191159-SH-01-0, location H-11, downstream of valve 20A.

### 2.3.3.12 John Deere Diesel System

#### Inspection Item 2.3.3.12-1

The John Deere diesel systems are installed in compliance with 10 CFR 50 Appendix R requirements. Due to a lack of available drawings and/or detailed description of the diesel equipment listed in Table 2.3.3-12 of the LRA, it is difficult to determine if any components subject to AMR may have been omitted from the table. It is recommended that both of the John Deere diesel systems be inspected to assure all components subject to AMR are included in the list of Table 2.3.3-12 of

the LRA. Determine how the fuel oil day tank and supply line interface with each diesel and whether any of their components should be included in the table. Perform an inspection to ensure that the license renewal scope boundaries for these components satisfy the applicable requirements of 10CFR 54.4(a)(3).

#### 2.3.3.13.c Augmented Off-Gas System

##### Inspection Item 2.3.3.13c -1

The LRA states that the augmented off-gas (AOG) system is within the scope of license renewal based on 10 CFR 54.4(a)(2) because of the potential for physical interaction with safety-related components (Table 2.3.3.13-A). The determination of whether a component meets the criterion of 10 CFR 54.4(a)(2) for physical interactions is based on where it is located in a building and its proximity to safety-related equipment or where a structural/seismic boundary exists. This information is not provided on license renewal drawings nor was a detailed description provided in the LRA. Consequently, any omission of AOG components subject to AMR cannot be determined. Perform an inspection to ensure that the license renewal scope boundaries for this system satisfy the applicable requirements of 10CFR 54.4(a)(2) and all the components subject to AMR are included in Table 2.3.3-13-1.

#### 2.3.3.13.f Circulating Water System

##### Inspection Item 2.3.3.13f-1

The LRA states that the Circulating Water system is within the scope of license renewal based on the potential for physical interaction with safety-related components (10 CFR 54.4(a)(2)) (Table 2.3.3.13-A). The applicant did not provide drawings highlighting in-scope 10 CFR 54.4(a)(2) components stating that the drawings would not provide significant additional information since the drawings do not indicate proximity of components to safety-related equipment and do not identify structural/seismic boundaries. Without license renewal drawings and/or detailed description of the Circulating Water system the omission of components subject to AMR cannot be determined (see Table 2.3.3-13-9 of the LRA). Perform an inspection to ensure that the LR scope boundaries for this system satisfy the applicable requirements of 10CFR 54.4(a)(2) and all the components subject to AMR are included in Table 2.3.3-13-9.

#### 2.3.3.13.k Reactor Water Cleanup System

##### Inspection Item 2.3.3.13k-1

The LRA states that the Reactor Water Clean-up (RWCU) system is within the scope of license renewal based on 10 CFR 54.4(a)(2) because of the potential for physical interaction with safety-related components (Table 2.3.3.13-A). The determination of whether a component meets the criterion of 10 CFR 54.4(a)(2) for physical interactions is based on where it is located in a building and its proximity to safety-related equipment or where a structural/seismic boundary exists. This information is not provided on license renewal drawings nor was a detailed description provided in the LRA. Consequently, any omission of RWCU components subject to AMR cannot be determined. Perform an inspection to ensure that the license renewal scope boundaries for this system satisfy the applicable requirements of 10CFR 54.4(a)(2) and all the components subject to AMR are included in Table 2.3.3-13-36.

M<sup>2</sup>

Division Of Reactor Safety

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