

Perry Buckberg - Re: Safety Evaluation Review Team - Exit Meeting - Plymouth h - 01.30.07- request for information

From: "Mary Lampert" <mary.lampert@comcast.net>
To: "Perry Buckberg" <PHB1@nrc.gov>
Date: 2/5/2007 10:38 AM
Subject: Re: Safety Evaluation Review Team - Exit Meeting - Plymouth h -01.30.07- request for information
CC: "Bob Knox(Globe-South)" <RC.Knox@gmail.com>, "Molly Bartlett" <mollybartlett@hotmail.com>, "Millie Morrison" <millie.morrison@verizon.net>, "Henry Chang" <tigerami@adelphia.net>, "Barbara Pye" <bapye@msn.com>, "Kevin Craig" <kevinwcraig@comcast.net>, "Becky Chin" <rebeccajchin@hotmail.com>

Perry:

Only the first set of questions, pertaining to pipes and tanks, are under consideration; I am hard pressed to understand why the information requested would not be immediately forthcoming - and, there is no reason the remaining issues need to jump through loops.

Thanks,

Mary

----- Original Message -----

From: Perry Buckberg
To: Mary Lampert
Cc: Susan Uttal
Sent: Monday, February 05, 2007 9:49 AM
Subject: Re: Safety Evaluation Review Team - Exit Meeting - Plymouth h -01.30.07- request for information

Mary,

Of course the technical content of any information contained in a response would reflect the position of NRC Engineers. But with hearings scheduled and technical issues generally considered "pre-decisional" at this stage, I can discuss only what OGC allows.

I did sign the letter Friday that made the Audit Report (ML063110278) publicly available - your are copied on the letter.

Thanks,
Perry

>>> "Mary Lampert" <mary.lampert@comcast.net> 2/5/2007 9:27 AM >>>
Perry:

Thank you for your response; and I must share with you that I find it disturbing that you require the approval of the NRC Office of General Council in order to respond. Instead, I would think it more appropriate for you to go to the pertinent NRC engineering experts.

The information should be available to stakeholders

I am hard pressed to think it is "safeguards."

Thank you and I look forward to a timely response.

Mary

----- Original Message -----

From: Perry Buckberg

To: Mary Lampert

Cc: Susan Uttal

Sent: Monday, February 05, 2007 7:45 AM

Subject: Re: Safety Evaluation Review Team - Exit Meeting - Plymouth h - 01.30.07- request for information

Mary,

I received your e-mail and will discuss my response with the NRC Office of General Council.

Thanks,

Perry Buckberg

Project Manager - Division of License Renewal

phone: (301)415-1383

fax: (301)415-3031

phb1@nrc.gov

>>> "Mary Lampert" <mary.lampert@comcast.net> 2/2/2007 3:08 PM >>>

Please verify receipt by return email.

Safety Evaluation Review Team - Exit Meeting -Plymouth - 01.30.07

Perry Buckberg

Project Manager, License Renewal - PNPS

PHB1@NRC.gov

Perry:

After the Exit Meeting, January 30, 2007 in Plymouth, I am left with some questions. Please respond to them; and we would greatly appreciate a timely response.

Thank-you,

Mary Lampert

Pilgrim Watch, Director

Town of Duxbury Nuclear Advisory Committee, Chair

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1. Buried Pipes

I understood from the presentation that an outstanding issue concerns "buried piping inspection." Pilgrim Watch has brought forward a contention specifically on this topic---*The Aging Management Plan Does Not Adequately Inspect and Monitor For Leaks in Buried Pipes and Tanks That May Contain Radioactively Contaminated Water.*

I asked the following questions at the 01.30.07 exit meeting and request clarification on your responses electronically and a copy by hard mail.

Q.1.A Although listed as only "pipes" I understood NRC to say that the outstanding issue

includes both buried pipes and tanks? Is that correct?

Q.1.B I understood NRC to say that those would be required to be examined one time before the current license expires in 2012 - is this correct? When specifically will they be examined? When will a public report be available?

Q.1.C Do all buried pipes and tanks have to be examined or only a sample?

Q.1.D If only a sample, what percent have to be sampled?

Q.1.E Please list and describe the total number of buried pipes and tanks (name of component; size, all 3 dimensions; liquid capacity; depth buried) and then check the pipes and tanks that will be sampled - include a schematic so that it is clear where they are located.

Q.1.F How are they to be examined by the applicant? More specifically will they be examined in the same manner as described in the application for the aging management program?[1] If not, how precisely will the testing differ?

Q.1.G Has the applicant indicated placing monitoring wells so that leaks could be detected?

Q.1.H When will communications pertaining to this issue be made public? Please provide to me a written copy and the Adams Accession number.

2. Dry Well - unresolved issue

To protect public health and safety, Pilgrim Watch submits that (1) UT measurements should be taken periodically, more than once, for the life of the reactor over the (20) years extension to confirm that the actual corrosion measurements are as projected; (2) that additional UT measurements be greatly expanded into areas not previously inspected at all critical levels of the drywell liner including the section of the liner that is submerged into the concrete floor and multiple measurements to determine "crevice corrosion" for the liner that is submerged into the concrete floor where water may have (or is likely to have) worked its way through cracks, pooled and corroded containment; and those areas identified by a root cause analysis that may be the cause of leakage, to include the refueling seal; and (3) a base line -corrosion rate - in all areas must first be established before 2012.

Pilgrim Watch stated at the meeting our concern that Entergy claims to have developed a corrosion rate in the LER, but we can not understand how the applicant can claim to have developed corrosion rate if Entergy looked at only selected, not all, areas. The LER Amendment states that they looked "above the sand cushion region;" "adjacent to the sand cushion region;" and, "at the level of the upper sand cushion." But, and this is the main point, there is no indication that they have made UT inspections at the lower, middle and embedded regions. Without ever looking at those critical regions, Pilgrim Watch is hard pressed to have confidence in the Applicant's LER conclusion, page 4, that, "there is no detectable loss of material and hence no discernable corrosion rate."

Q.2.A. Define exactly where Entergy looked in the "upper sand cushion."

Q.2.B. Precisely what additional tests are they required to perform - exact location; number; testing method.

Water in the Torus

At the Exit meeting, NRC stated that there was water in the Torus. We note water in the Torus has been identified before.

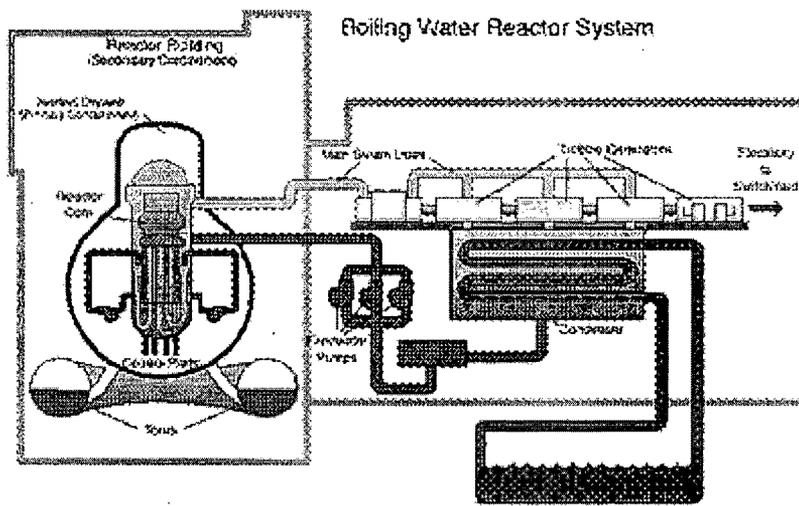
Q.2.C. Corrosion of Torus shell: Example, during RFO14 (April 2003) ultrasonic thickness examination of the Torus shell, several measurements were below the nominal wall thickness of 0.629." The applicant stated that since the measurements were all greater than the minimum allowable thickness of 0.563", no further action was taken; and identification of degradation and corrective action prior to loss of intended function provide evidence that the program is effective for managing aging effects.

This is Orwellian reasoning what it indicates simply is that there is corrosion. Will there be testing before 2012, schedule and method? What testing of the Torus shell is planned for 2012-2032, schedule and method?

Q.2.D. We recollect that it was opined that the water in the Torus came from groundwater; is that correct?

Q.2. E.

- 1) If the water is thought to have come from groundwater, how did it get there - from rain/moisture seeping down through the ground; from the water table, water coming up; from the ocean; a combination?
- 2) What is the height of the water table; what is the distance from the water table to a specified location on the building; indicate on diagram provided at Exit Meeting?
- 3) Was the water in the Torus tested for salinity - especially important considering the corrosive effect of salt on concrete? If so, what was the result?
- 4) Was the water tested for radionuclides? If so, what was the result?
- 5) If the water got in, we can assume it can get out. Is this correct? If correct, where would it go; what tests are performed on said water for its radiological and chemical content?
- 6) Is the Torus checked for water now and what will be required from 2012-2032? If required, what is the schedule and method used to check for water now and during 2012-2032?
- 7) Will monitoring wells be required to test for leakage into the ground?
- 8) If water is in the Torus what assurance is there that the water will not eat into, weaken, the adjacent concrete that supports the dry well? There is no indication that they have made UT inspections at the lower, middle and embedded regions -how do we know whether there is corrosion?



3. Wiring

I asked the NRC Staff at the Exit meeting how wiring was reviewed. Recognizing that failures could be attributed to old wires with rubber coating that turned brittle and cracked. Simply because the mechanism works such as a pump - testing the pump does not test the condition or re-qualify the wire coating -the EQ-only the metal wire, itself. These wires are required to perform under harsh conditions (fire, high temperature, high moisture) hence their condition is an important safety concern. As the wiring ages its ability to still meet the original qualification tests should be challenged.

Q 3.A How does Entergy check that the EQ rating of a wire 40 years old to assure that it will be good for 60 years? Please describe the aging management process for safety related wiring EQ verification.

4. Core Shroud Cracking Issue.

Pilgrim Station implemented a 'fix' for the shroud cracking that included installing spring clips to put a compressive load on the shroud to limit or prevent the crack formation, growth and effects. There was not an opportunity to ask questions necessary to understand the current status of these cracks.

Q.4.1. Has NRC actually inspected for cracks, were any found and if so, what is the significance? Has Pilgrim performed additional inspections? When and what were the results? How is the aging going to be managed - frequency and method inspection?

5. Counterfeit and Substandard Parts

In 1987, the widespread use of counterfeit parts in the industry was identified. The U.S. Government Accounting Office issued a report - GAO/RCED 91-6, Counterfeit and Substandard Products, October 1990. The parts perform a variety of functions from protecting against electric overloads to keeping equipment securely anchored. Pilgrim was among the reactors identified by GAO using parts that did not meet government standards - nuts, bolts, pipe fittings, circuit breakers and fuses.

The use of counterfeit parts destroys the validity of NRC risk assessments and assurances of safety.

GAO Pilgrim: Fasteners (Product received by licensee); Pipe Fittings/Flanges (Product suspected of having been received); Circuit Breakers (Product received); Fuses (Product suspected of having been received).

Q.5.1. Was there an Audit at Pilgrim, specifically done? If so when and please provide the report by mail and an Adams Accession number to that report.

Q.5.2 Please list the number and location of actual and suspected substandard and or counterfeit parts at Pilgrim; and indicate which one(s) were replaced.

Q. 5.3. If the substandard parts were not replaced was the decision based on the expectation of a 40 year license; and if so what assurance is there that they would be safe for an additional 20 years?

Q. 5.4. How can NRC or licensee evaluate the aging management program if the authenticity of the component is not known?

[1]The Applicant describes the inspection and aging management programs for underground pipes and tanks at Pilgrim in Appendix A and B of its renewal filing. Appendix A.2.1.2. "Buried Pipes and Tanks Inspection Program page A-14" states that buried components are inspected when excavated during maintenance and if "trending" identifies a susceptible location, this area with a history of corrosion might have additional inspections, coating or replacement. Focused inspections will be performed within 10 years of the license renewal unless an "opportunistic inspection" which allows assessment of pipe condition without excavation, occurs within the ten-year period. Appendix B describes the Aging Management Program for buried pipes and tanks. This section also says that buried components will be inspected when excavated during maintenance, and that a focused inspection will be performed within ten years unless an opportunistic inspection occurs within this period. The program is consistent with NUREG-1801, except that Appendix B also provides that "Inspections via methods that allow assessment of pipe condition without excavation may be substituted for inspections requiring excavation solely for the purposes of inspection." These latter inspections can include phased array Ultrasonic Testing (UT) technology that provides indication of wall thickness for buried piping without excavation. The application says that use of such methods to identify the effects of aging is preferable to excavation for visual inspection, which could result in damage to coatings or wrapping. (Application, B.1.2, page B-17). However, UT methods to measure the thickness of the component, as stated by the applicant would not necessarily detect a hole or crack in the component. And "array UT technology" implies testing only selected areas of the pipe/tank, not testing along the entire structure's surface area. Simply testing selected areas can miss holes, cracks or vulnerably thin sections of these components. The application also states that these methods have not been used in the past, so there is no operating experience to rely on.

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Subject: Re: Safety Evaluation Review Team - Exit Meeting - Plymouth h - 01.30.07- request for information

Creation Date 2/5/2007 10:38:12 AM

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Priority:	Standard
ReplyRequested:	No
Return Notification:	None

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Security:	Standard

Junk Mail Handling Evaluation Results

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Junk Mail settings when this message was delivered

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Junk Mail handling disabled by Administrator
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