

From: "Sanchez, Edward" <esanch1@entergy.com>
To: <phb1@nrc.gov>
Date: 3/29/2007 9:49:47 AM
Subject: PDF copy of Entergy letter providing comments on draft SER on Pilgrim LRA

Good morning Perry,

Attached is a PDF copy of the signed Entergy letter providing comments on the draft SER on the Pilgrim LRA.

Ed Sanchez
Pilgrim Licensing

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Creation Date 3/29/2007 9:49:00 AM
From: "Sanchez, Edward" <esanch1@entergy.com>
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Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360

Stephen J. Bethay
Director, Nuclear Assessment

March 28, 2007

Mr. Michael Lesar
Chief, Rules Review and Directives Branch
U.S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, DC 20555-0001

SUBJECT: Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
Docket No. 50-293 License No. DPR-35
Comments on Draft Safety Evaluation Report, dated March 2007

REFERENCES: 1. Entergy letter, License Renewal Application, dated
January 25, 2006 (2.06.003)
2. Safety Evaluation Report With Open Items Related to the License
Renewal of Pilgrim Nuclear Power Station, dated March 2007

LETTER NUMBER: 2.07.028

Dear Sir or Madam:

In the referenced Entergy letter, Entergy Nuclear Operations, Inc. applied for renewal of the Pilgrim Station operating license. NRC TAC NO. MC9669 was assigned to the application.

The letter transmitting the Safety Evaluation Report provided the opportunity to submit comments for consideration by the NRC staff by April 1, 2007. Enclosure 1 provides Entergy Nuclear Operations, Inc. comments on the referenced Safety Evaluation Report.

This letter contains no commitments.

Please contact Mr. Bryan Ford, (508) 830-8403, if you have any questions regarding this subject.

Sincerely,

A handwritten signature in black ink that reads "Stephen J. Bethay".

Stephen J. Bethay
Director, Nuclear Safety Assessment

DWE/dl

Enclosure: (as stated)

cc: see next page

Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station

Letter Number: 2.07.028
Page 2

cc: with Enclosures

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ENCLOSURE 1 to Letter 2.07.028
(12 pages)

Comments on Draft Safety Evaluation Report, dated March 2007

Note: The section number(s) and page number(s) cited in the following listing correspond to the section number(s) and page number(s) as identified in the draft Safety Evaluation Report.

Section Number(s)	Page Number(s)	Comment
Section 2		
2.1.1	2-1	Third paragraph, reference to NEI 95-10 should be Revision 6, not Revision 5.
2.1.3.1.1	2-3	The "component record list" is not mentioned in the LRA, nor was such a document used for Pilgrim.
2.1.3.1.1	2-4	<p>The sentence at the top of the page ends, "and depicted the in-scope system boundaries with color highlighting on the license renewal boundary drawings (LRBDs)." This is followed by a single-sentence paragraph, "The LRBDs show the systems within the scope of license renewal highlighted in color."</p> <p>As stated in Section 2.1.4.5.1, the color highlighting shows components subject to AMR, not the system boundaries. Boundary flags on the drawings denote the portion of the system necessary to support intended functions. The LR rule requires identification of SCs subject to AMR.</p> <p>Suggest rewording the sentence to read, "...and identified the SCs subject to AMR with color highlighting on the license renewal boundary drawings (LRBDs)." The single-sentence paragraph should be deleted.</p>
2.1.3.1.2	2-4	<p>Suggest changing the following sentence as shown.</p> <p>As defined in 10 CFR 54.3(a), the CLB is the set of applies applicable NRC requirements, and written licensee commitments for ensuring compliance with, and operation within, applicable NRC requirements, and plant-specific design bases docketed and in effect.</p>
2.1.3.2	2-4	The last paragraph on the page, under "Sources of CLB Information," second line of paragraph: "plant system and DBDs" should be "plant system DBDs."

Section Number(s)	Page Number(s)	Comment
2.1.3.1.2	2-5	Regarding the first paragraph on Page 2-5. Incorporation of CLB updates does not involve checklists. Suggest rewording as indicated below. As part of this effort, the applicant examined all engineering change requests implemented approved as of four three months before the LRA submission, factored in all changes that could affect the LRA, and developed guidance for the evaluation of CLB changes that could impact the LRA. The guidance describes the process so the LRA annual updates include checklists to facilitate the evaluation and adequately document the results of CLB changes.
2.1.3.1.2	2-5	The SER refers to "the five events specified in 10 CFR 54.4(a)." Suggest changing to indicate 54.4(a)(3) when referring to the five events. Also suggest changing the end of the sentence to indicate, "and the five regulations specified in 10 CFR 54.4(a)(3)."
2.1.3.3.1	2-6	Suggest changing the first sentence of the second paragraph to indicate, "The LRPGs specify requirements for reading training materials and attending training sessions for the license renewal project team and for site personnel."
2.1.3.3.1	2-6	Suggest changing "examined" to "reviewed" in the second paragraph.
2.1.4.1.1	2-7	The SER states, "The SSCs within the functional ASME Class 1 breaks depicted on the plant drawings (i.e. piping and instrumentation diagrams (P&IDs)) constitute the q-list." The class breaks on the drawings include more than ASME Class 1 components in the Q list. Suggest changing the sentence as indicated below. The SSCs within the functional class ASME Class 1 breaks depicted on the plant drawings (i.e. piping and instrumentation diagrams (P&IDs)) constitute the q-list.
2.1.4.1.2	2-8	Regarding the second complete paragraph beginning with "In RAI 2.2-1...": Second sentence ends with, "and requested from the applicant a list of all DBEs evaluated for license renewal." Since the next sentence begins, "Therefore, the staff requested a list of DBEs evaluated in the license renewal scoping process...", suggest deleting the phrase at the end of the second sentence.
2.1.4.1.2	2-9	Regarding the paragraph beginning, "To help identify SSCs within the scope...." ends with "...system DBDs, and DBDs." Suggest changing to "system DBDs, and topical DBDs."

Section Number(s)	Page Number(s)	Comment
2.1.4.1.2	2-9	Suggest changing the last paragraph, last sentence, "The applicant stated that these guideline..." to "The applicant stated that these guidelines ..."
2.1.4.1.2	2-9	Suggest inserting the word "and" and "after" respectively in the last sentence on page 2-9 that continues on to Page 2-10.
2.1.4.2.1	2-11	In the second paragraph under Physical Impact, reference to "component parts of nonsafety-related lines" is somewhat confusing. Suggest clarifying as noted below. The applicant evaluated nonsafety-related portions of high-energy lines in the UFSAR and relevant DBDs and high-energy systems for component parts of nonsafety-related portions of high-energy lines that can affect safety-related equipment. If the applicant's high-energy line break (HELB) analysis assumed that a nonsafety-related piping system did not fail or assumed failure only at specific locations, that piping system (piping, equipment, and supports) was included within the scope of license renewal.
2.1.4.2.2	2-12	The third paragraph, last sentence has extra "and" before "industry safety operational event reports...."
2.1.4.2.2	2-13	Paragraph 2 indicates "the applicant's previous analysis". Only one analysis is discussed.
	2-15	The SER states, "the applicant then walked-down the mechanical systems to identify whether components are located within a safety-related structure." In most cases, component locations were determined without the need for physical inspections. In isolated cases, walkdowns were performed. Suggest changing as indicated below. The applicant then walked-down the mechanical systems to identify identified whether nonsafety-related components of the mechanical systems are located within a safety-related structure.
2.1.4.3.1	2-16	Regarding the paragraph starting on the bottom of the page (begins with <u>FP</u>), the last line appears to be missing a word. Suggest changing the sentence to read: "credited with safe shutdown in a fire were included within the scope of license renewal."
2.1.4.3.2	2-17	Suggest changing the sentence in the top paragraph : "The report indicates which of were the mechanical systems included within the scope of license renewal because ..." to "The report indicates which of the mechanical systems were included within the scope of license renewal because ..."

Section Number(s)	Page Number(s)	Comment
2.1.4.2.1 (3)	2-11	Regarding the third line of "Physical Impact" paragraph; "safety-related missiles" should maybe be "safety-related equipment from missiles." A suggested change to the paragraph is indicated below. "The applicant evaluated nonsafety-related structures and components to identify features that protect safety-related equipment from physical impact, or features whose structural failure could result in physical impact to safety-related equipment. Nonsafety-related features that protect safety-related equipment from missiles were included within the scope of license renewal. The structural failure of equipment such as overhead handling systems could directly damage safety-related equipment. Nonsafety-related equipment, the structural failure of which could damage a system and possibly prevent the accomplishment of a safety function was included within the scope of license renewal.
2.1.4.2.1 (3)	2-12	The sentence at the top of page (last sentence of partial paragraph). In regards to (a)(2) in the context of the paragraph, the sentence should indicate "systems containing only air or gas were not included within the scope of license renewal based on the potential for spray or leakage. "
2.1.4.4.1	2-18	Regarding the first full paragraph (seventh line), "PNPS component database" is incorrect. Suggest changing to indicate the "PNPS Q-list".
2.1.4.5.2	2-21	Suggest changing the first paragraph (third line from bottom), "maintenance rule database" to "maintenance rule basis documents".
2.1.4.5.2	2-21	Regarding the last line on page, suggest inserting "were" before "adequately implemented."
2.1.4.5.2	2-23	Regarding the last sentence before Section 2.1.4.5.3, suggest changing to indicate "and was adequately implemented."
2.1.5.2.2	2-27	About 2/3 through the first paragraph is the following sentence: "The applicant also consulted the PNPS component database to confirm that all system components had been considered." A component database was not used, Suggest deleting or changing the sentence.

Section Number(s)	Page Number(s)	Comment
2.1.6	2-30	Suggest changing the first sentence to indicate, "The information in LRA Section 2.1, the supporting information in the scoping and screening implementation procedures and reports, and the information presented during the scoping and screening methodology audit, and the applicant's responses to the staff's RAIs dated...."
2.3.1	2-36 2-37	The SER states "LRA Table 2.3.3-14-6 shows CRD system component types within the scope of license renewal and subject to an AMR." Table 2.3.3-14-6 shows only CRD system nonsafety-related component types affecting safety-related systems, within the scope of license renewal, and subject to an AMR: The safety related CRD system components subject to AMR are included in Table 2.3.1-3. (Including the drives and the scram accumulators) as noted on SER page 2-41.
2.3.1.2.1	2-39	Suggest changing "CRD tubes" in the text to "CRD guide tubes" to be consistent with the application and with the list of components on page 2-40 of the SER.
2.3.1.2.1	2-39	The local power range monitors are abbreviated as LRPM versus LPRM. LRPM appears 5 times in the SER.
2.3.1.2.2	2-41	The first full paragraph on Page 2-41 begins with, "In its response dated August 30, 2006, the applicant stated ...". This discussion is intended to answer the staff question regarding which neutron monitors and related cables are within the scope of license renewal based on the bounding approach for electrical equipment. For clarity, recommend revising the paragraph to simply state, "In its response dated August 30, 2006, the applicant stated that all electrical and I&C commodities in electrical and mechanical systems are in scope by default; therefore, the neutron monitoring components and related cables described in UFSAR Section 7.5 are within the scope of license renewal."
2.4.1.1	2-121	Suggest changing "Concrete floor slabs, structural steel floors, and platforms inside the drywell are as required" to the suggested wording indicated below. "Concrete floor slabs, structural steel floors, and platforms inside the drywell are provided as required".

Section Number(s)	Page Number(s)	Comment
2.4.1.1	2-123	Regarding the bullet item under the heading Fluoropolymers and lubrite sliding supports, “. Fluoropolymers and lubrite sliding supports” should be changed to indicate “. Lubrite sliding supports”
2.4.3.1	2-130	The second sentence on the page indicates, “The intake structure component intended functions within the scope of license renewal include:”. The LR rule defines SSCs within scope; not functions. Suggest changing the sentence to indicate, “The component intended functions of the intake structure components within the scope of license renewal include:”. This suggested change applies throughout the scoping section of the SER.
2.4.5.1	2-136	The fifth bullet item, under the intended functions “structural or functional support for FP, EQ, pressurized thermal shock (PTS), ATWS, or SBO” should be deleted because it is a duplicate of the sixth bullet item.
2.4.6.1	2-138	In addition to the heading “Steel and Other Metals”, another heading entitled “Threaded Fasteners” should be inserted just before the bullet item “anchor bolts”. The title “Threaded Fasteners should have the following three (3) listed bullet points: anchor bolts, ASME Classes 1, 2, 3, and MC support bolting, and structural bolting.
2.4.6.1	2-139	The seventh bullet item “structural or functional support for FP, EQ, pressurized thermal shock (PTS), ATWS, or SBO” should be deleted because it is a duplicate of the eighth bullet item.
Section 3		
3.0.1.2	3-3	Regarding the sentence that indicates, “If there are no corresponding items in the GALL Report, the applicant leaves the column blank in order to identify the AMR results in the LRA tables corresponding to the items in the GALL Report tables.” Since leaving the column blank provides no correlation, the last part of this sentence should be a separate sentence that applies to the entire paragraph, such as, “If there are no corresponding items in the GALL Report, the applicant leaves the column blank. In this way, the applicant identified the AMR results in the LRA tables corresponding to the items in the GALL Report tables.”

Section Number(s)	Page Number(s)	Comment
3.0.3		Regarding the programs section when describing the NRC staff review of the PNPS Aging Management Program Evaluation Report, this document is referred to as the Reconciliation report. This document is not a reconciliation report but a program evaluation report or a program basis document. Suggest changing this term to program evaluation report.
3.0.3.1.3	3-13	The first sentence of the second paragraph appears to be somewhat confusing in referring to equipment identified as a TLAA. Since a TLAA is an analysis, suggest changing the sentence as indicated below. “During the audit and review, the staff noted that LRA Section 4.4 indicates that for equipment addressed by an EQ TLAA, the effects of aging will be managed in accordance with 10 CFR 54.21(c)(1)(iii) during the period of extended operation. However, information on a reanalysis to extend the qualified life of electrical equipment was not identified.”
3.0.3.1.5	3-19	Regarding the first paragraph (last sentence), suggest changing “tree” to “treeing”.
3.0.3.1.8	3-26	This section discusses the One-time inspection program yet only discusses the portion of the program comparing to XI.M35 for small bore piping. It doesn't discuss the portion of the program compared to XI.M32.
3.0.3.2.8	3-64 3-65 3-66	Suggest consistency in the identification of the noted ASTM standards. Some standards have a space, others have no space, and others have a hyphen in the respective standard's identification.
3.0.3.2.12	3-81	In the third paragraph, suggest changing the word “fixed” to “flexed”.
3.0.3.2.14	3-88	Third paragraph under operating experience does not apply to the reactor head closure studs program and should be deleted.

Section Number(s)	Page Number(s)	Comment
	Various	In several places, the SER includes statements similar to "The staff did not agree with the applicant that the absence of new recordable indications proves that the program effectively manages the effects of aging. The program is a monitoring program which uses qualified techniques and qualified operators capable of identifying the presence of new recordable indications." This specific quote is from Section 3.0.3.2.14 on Page 3-88. The SER misquotes the LRA. The LRA did not indicate "the absence of new recordable indications proves that the program effectively manages the effects of aging". The LRA states "Absence of new recordable indications provides evidence that the program is effective for managing loss of material and cracking...". The SER indicates the staff found the programs consistent with NUREG-1801 for the preventive measures for mitigating aging effects. For programs that include preventive actions, the absence of indications of aging effects is certainly evidence of program effectiveness. Statements to this effect are generally inconsistent with NUREG-1801 which considers this an aging management program and with other parts of the SER that conclude the program "reasonably assures management of aging effects...".
3.0.3.2.16	3-93	Suggest changing (Commitment No. 23)" to "(Commitment No. 24)" to correct an apparent typographical error. Commitment No. 24 pertains to heat transfer test results, not Commitment No. 23.
3.0.3.2.20	3-102	Suggest changing "LRA supplement 5," to "response" in the first sentence of the first paragraph for consistency with other references to Entergy LRA correspondence.
3.0.3.2.20	3-103	Suggest changing "LRA supplement 5," to "response" in the first sentence of the first paragraph for consistency with other references to Entergy LRA correspondence.
3.0.3.5.5	3-120	In the first paragraph of Preventive Actions it states "LRA Section B.1.24 states that inspection and testing to detect component effects of aging do not prevent them;". This wording does not match the LRA. Suggest changing the paragraph as indicated below. "LRA Section B.1.24 states that inspection and testing activities used to identify component aging effects do not prevent aging effects;"
3.0.3.3.7	3-128	Suggest changing "LRA Amendment 11," to "response" in the first sentence of the first paragraph for consistency with other references to Entergy LRA correspondence.

Section Number(s)	Page Number(s)	Comment
3.0.4.2	3-135	Suggest changing "RAI 2.1-3" to "RAI 3.0-X" in the first sentence of the second paragraph. The referenced NRC RAI was not numbered 2.1-3, the RAI was numbered 3.0-X.
3.1.2.1.4	3-162	Suggest changing "Table 3.11" to "Table 3.1.1" on the next to last line of the second paragraph to correct a typographical error. The LRA does not contain Table 3.11, and the preceding information identifies Table 3.1.1.
3.1.2.2.1	3-171	Suggest changing "CRD detector" to "detector (CRD) in Table 3.1.2-3" on the last line of the page to clearly identify this component type, as listed in the table.
3.1.2.2.1	3-172	Suggest changing "for the CRD drives" to "drive (CRD) in Table 3.1.2-3" on the second line of the second paragraph to clearly identify this component type, as listed in the table.
3.1.2.2.1	3-172	Suggest changing "recirculation pump casings and covers" to "pump and casing (RR) in Table 3.1.2-3" on the second line of the fourth paragraph to clearly identify this component type, as listed in the table.
3.1.2.2.1	3-172	Suggest changing "MS line restrictors" to "restrictors (MS) in Table 3.1.2-3" on the second line of the sixth paragraph to clearly identify this component type, as listed in the table.
3.1.2.2.4	3-178	Suggest deleting the double underline of "to" in the second line of the second indented sentence at the top of the page, to delete an apparent editorial change made during development of the draft.
3.1.2.3.3	3-190	Suggest replacing the last sentence in the first complete paragraph to indicate "The applicant supplemented LRA Appendices A and B in response dated July 19, 2006."
3.2.2.1.1	3-203 and 3-204	The last sentence in first paragraph on Page 3-203 and first sentence in last paragraph of this section on Page 3-204 refers to the "primary coolant pump system". Suggest changing the wording to indicate "primary containment penetrations system".
3.2.2.2	3-210	Regarding the bullet "Loss of material due to cladding" Suggest adding the word "breach" at the end, for consistency with the GALL
3.2.2.2.1	3-210	The sections on Cumulative Fatigue Damage refer to "Type 2 AMR tables". SER Section 3.0.1 and the rest of the SER refer to the same tables as "Table 2s".

Section Number(s)	Page Number(s)	Comment
3.2.2.2.1	3-210	This section uses the term “emergency safety feature systems” throughout. For consistency with the rest of the SER and the LRA, suggest using the correct term, “engineered safety features systems”.
3.2.2.2.1	3-210	Beginning in the second paragraph, the SER states the staff reviewed the applicant’s TLAA on metal fatigue...in LRA Section 4.3.2. LRA Section 4.3.2 discusses the evaluation of TLAA on metal fatigue. Suggest changing this wording as indicated below. “The staff reviewed the applicant’s evaluation of the metal fatigue TLAA for Non-Class 1 components in LRA Section 4.3.2.”
3.3.2.2.3	3-268	On Page 3-268, the SER states that LRA Appendix A for these three water chemistry control programs was revised to include the sentence: “The effectiveness of the program will be confirmed by the One-Time Inspection Program.” LRA Amendment 5 (7/19/2006) states, “LRA Appendix A is revised for these three water chemistry control programs to include the sentence ‘The One-Time Inspection Program will confirm the effectiveness of the program’.” Suggest changing the wording to be consistent with the LRA Amendment 5 wording.
3.3.2.3	3-287	The following statement is inconsistent with the previous paragraph “On the basis that these components are exposed to a dried air environment, the staff found this aging effect not applicable to these component type.” These components are exposed to a condensation environment and have Instrument Air Quality as the AMP. This should be changed to indicate “On the basis that these components are not exposed to a dried air environment”.
3.3.2.3.5	3-296	The first paragraph second sentence states “The Periodic Surveillance and Preventive Maintenance Program manages fouling for heat exchanger tubes for the SBO diesel generator system SBD generator surveillance tests.” The sentence should indicate “The Periodic Surveillance and Preventive Maintenance Program manages fouling for heat exchanger tubes for the SBO diesel generator system using SBO generator surveillance tests.”

Section Number(s)	Page Number(s)	Comment
3.3.2.3.6	3-297	The third paragraph second sentence states "The Periodic Surveillance and Preventive Maintenance Program manage fouling for heat exchanger tubes for the security diesel generator system security diesel generator surveillance tests." The sentence should indicate "The Periodic Surveillance and Preventive Maintenance Program manages fouling for heat exchanger tubes for the security diesel generator system using security diesel generator surveillance tests."
3.4.3.2.12	3-337	The title of the Table is incorrect. Table 3.3.2-14-35 is titled "Turbine Generator and Auxiliaries System" in contrast to the title "Turbine Steam and Power Conversion Generator and Auxiliary System" indicates in the SER.
3.5	3-338	The first paragraph first sentence uses the term "component" and "components" in a manner such that the sentence does not seem to be clear.
3.5.2.1	3-353	The SER states, "In a letter dated June 19, 2006, the applicant stated that the primary containment has no moisture barrier." The sentence should indicate "July 19, 2006".
3.5.2.2.1	3-365	Regarding the second to last sentence in the first paragraph that indicates "...reactor building is founded on sound bedrock ...". Suggest the sentence be changed to reflect the following consideration of the following information. The Pilgrim UFSAR section 12.2.4.4.3 indicates the lowest floor of the reactor building is founded at -25.5 ft msl (i.e. 25.5 feet below mean sea level) on dense to very dense silty sand and sand and gravel. UFSAR section 12.2.4.1 indicates bedrock is generally encountered at a depth of about 80 ft (i.e. about 80 feet below mean seal level) in the station area, which is much below the lowest floor level of the reactor building.
3.5.2.2.1	3-369	Suggest replacing "LRA Amendment 2" in the third sentence of the first complete paragraph with ""response dated June 7, 2006" for consistency with other references to Entergy LRA correspondence.
3.5.2.2.1	3-369	Suggest adding a new sentence, between the first and last sentences in the third paragraph to indicate that Entergy provided a response to the RAI in letters dated December 12, 2006 and March 13, 2007 to reflect the response was submitted in response to the noted RAI.

Section Number(s)	Page Number(s)	Comment
3.5.2.2.1	3-369	Regarding the third bullet in the middle of the page, "The torus room floor has had water on the floor on multiple occasions." While this statement is correct, the water appears to be coming from below the torus room floor (i.e. from ground water), not from refueling bellows leakage. Suggest changing the bullet in consideration of this comment.
3.6.2.1.2	3-403	Regarding the first paragraph last sentence, the Table 3.6.1 item number should be 3.6.1-10, not 3.6.1-9.
Section 4		
4.1.2.1	4-6	Suggest changing "September 6, 2006" to "October 6, 2006". The cited information was provided in the 10/6/06 response to RAI 4.3.1.2-2, in item (6).
4.3.1.2.2	4-19	The dates identified in last paragraph should be corrected as follows: "September 15, 2012" to "June 8, 2012" in two places, and "September 15, 2032" to "June 8, 2032". The License Renewal Application and the current operating license (DPR-35) line item 7 (last page) correctly identifies June 8, 2012 as the expiration date for the license.
4.7.2.3.2	4-36	Suggest the date of the letter and/or indicated wording beginning in the first line of the third paragraph be confirmed by the NRC LRA review team, and corrected as necessary. The letter dated July 5, 2006 and wording contained in the letter (7/5/06) were reviewed; the review indicated the wording did not appear in the letter (7/5/06).
4.7.2.3.3	4-36	Suggest the date "May 11, 2006" of the letter identified in the second line of the first paragraph be confirmed by the NRC LRA review team, and corrected as necessary. The letter dated May 11, 2006 was reviewed; the review identified that BWRVIP-49 and subject of this section were not the subject of the letter dated May 11, 2006.
Section 6		
6	5-1	The Section 6 page number should be changed from "5-1" to "6-1".
Appendix B	B-11	The chronology does not include Pilgrim – License Renewal Application Amendment 4 dated July 5, 2006.