

From: Mel Shannon ^{R11}
To: RMP@nrc.gov ^{DROP}
Date: 11/22/2006 11:18:44 AM
Subject: Re: ACTION: Review DPO-2006-003 Report

Renee, I have the following comments,

Issue 1, the use of LBB is not in dispute, the issue is the modification that cross tied the LPI headers. The licensee had a 10 inch cross tie for the LPI headers in the auxiliary building and it had 2 motor operated isolation valves. These valves could be accessed during an emergency for manual operation if necessary. The new cross tie is located in the reactor building and has 2 manual isolation valves that are maintained open during normal operation. These valves cannot be accessed during an emergency. So the LPI system is permanently cross tied. This appears to be contrary to GDC 34 and GDC 35. I don't think there is another nuclear facility in the US that has the LPI system permanently cross tied with no means to isolate the headers. Oconee has enough design problems without adding another.

Issue 2, the conclusion states that it was not clear that the NRC staff intended to approve the use of LBB for Oconee solely on the SER transmitted in 1986. This is misleading. The SER specifically stated that a site specific exemption was needed to use LBB. Later the Federal Register approved the use of LBB if a site specific evaluation was performed. Oconee did not submit either and does not have either. Oconee used BAW 1847 as its site specific evaluation and this was not allowed. Oconee should be required to perform a site specific evaluation. This may cause a problem with the use of LBB because of the Inconel 600 cracking problems. Some welds in the LPI header could not be approved for use of LBB, so why should the RCS be approved?