

**From:** "Sanchez, Edward" <esanch1@entergy.com>  
**To:** "Perry Buckberg" <PHB1@nrc.gov>  
**Date:** 6/21/2007 1:33:33 PM  
**Subject:** LRA Amendment 18

Perry,

Attached is a PDF copy of the LRA Amendment 18 letter.

Ed Sanchez  
Pilgrim Licensing

**Mail Envelope Properties** (467AB657.122 : 3 : 33058)

**Subject:** LRA Amendment 18  
**Creation Date** 6/21/2007 1:32:52 PM  
**From:** "Sanchez, Edward" <esanch1@entergy.com>

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**Recipients**

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Entergy Nuclear Operations, Inc.  
Pilgrim Nuclear Power Station  
600 Rocky Hill Road  
Plymouth, MA 02360

June 21, 2007

**Stephen J. Bethay**  
Director, Nuclear Assessment

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555-0001

**SUBJECT:** Entergy Nuclear Operations, Inc.  
Pilgrim Nuclear Power Station  
Docket No. 50-293 License No. DPR-35  
License Renewal Application (LRA) Amendment 18

**REFERENCES:** 1. Entergy letter, License Renewal Application,  
dated January 25, 2006 (TAC MC9669)  
2. Entergy letter, LRA Amendment 5, dated July 19, 2006  
3. Entergy letter, LRA Amendment 16, dated May 1, 2007

**LETTER NUMBER:** 2.07.060

Dear Sir or Madam:

In Reference 1 Entergy Nuclear Operations, Inc. (Entergy) applied for renewal of the Pilgrim Station operating license. In Reference 2 Entergy submitted several LRA changes, including one to LRA Appendix B, Section B.1.13.1 (NRC audit item 318). In Reference 3 Entergy submitted an LRA change in response to NRC SER Open Item 3.0.3.2.10 that involved the same LRA section revised by Reference 2, audit item 318. Reference 3 did not reflect the wording changes from Reference 2.

Attachment A to this LRA amendment combines the changes from References 2 and 3.

There are no new commitments made by this letter.

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 21, 2007.

Sincerely,

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

Stephen J. Bethay  
Director, Nuclear Safety Assessment

ERS/dl

Attachment A: Response to SER Open Item 3.0.3.2.10

Entergy Nuclear Operations, Inc.  
Pilgrim Nuclear Power Station

Letter Number: 2.07.060  
Page 2

cc: with Attachments

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## **ATTACHMENT A to Letter 2.07.060**

(1 page)

Response to SER Open Item 3.0.3.2.10

### **OI 3.0.3.2.10: (SER Section 3.0.3.2.10 - Fire Protection Program)**

The applicant is taking an exception to the GALL Report program element "detection of aging effects," specifically:

The NUREG-1801 program states that approximately 10 percent of each type of penetration seal should be visually inspected at least once every refueling outage. The PNPS program specifies inspection of approximately 20 percent of the seals each operating cycle, with all accessible fire barrier penetration seals being inspected at least once every five operating cycles.

The LRA states that, because aging effects typically are manifested over several years, this variation in inspection frequency is insignificant. GALL AMP XI.M26 specifies approximately 10 percent of each type of seal should be inspected visually at least every refueling outage (two years). The applicant clarified that the program specifies inspection of approximately 20 percent of the seals, including at least one seal of each type, each operating cycle, with all accessible fire barrier penetration seals being inspected at least once every five operating cycles. The applicant needs to address how to manage the aging effect of inaccessible fire barrier penetration seals.

### **OI 3.0.3.2.10 Response**

The PNPS requirement to inspect penetration seals applies to 100% of the seals. The word "accessible" is not necessary in the discussion of the exception for Detection of Aging Effects in the PNPS program. All fire barrier penetration seals are inspected at least once every five operating cycles. In LRA Appendix B, Section B.1.13.1, the word "accessible" is removed resulting in the following description of the exception for Detection of Aging Effects.

The NUREG-1801 program states that approximately 10% of each type of penetration seal should be visually inspected at least once every refueling outage. The PNPS program specifies inspection of approximately 20% of the seals, including at least one seal of each type, each operating cycle, with all accessible fire barrier penetration seals being inspected at least once every five operating cycles.