

Pilgrim Nuclear Power Station License Renewal Safety Evaluation Report

Staff Presentation to the ACRS

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Introduction



- Overview
- Section 2: Scoping and Screening Review
- License Renewal Inspections
- Section 3: Aging Management Review Results
- Section 4: Time-Limited Aging Analyses (TLAAs)

Overview



- LRA Submitted by Letter, January 27, 2006
- GE BWR3 MARK 1 Containment
- 2028 MWth, 690 MWe
- Op License DPR-35 Expires June 8, 2012
- Located in Plymouth, MA

Overview



- SER Issued June 28, 2007
- SSER to be Issued September, 2007
- Open Items (4) Have Been Closed
- Four (4) License Conditions
- 92 RAIs Issued, 329 Audit Questions
- ≈82% Consistent With GALL Report, Revision 1

Review Highlights



- AMP GALL Audit
 - May 22, 2006
- Scoping and Screening Methodology Audit
 - June 6 June 9, 2006
- AMR GALL Audit
 - June 19, 2006
- AMP/AMR Status Briefing
 - July 17 19, 2006
- Regional Inspections
 - September 18 22, 2006
 - October 2 6, 2006
 - December 6 7, 2006

Section 2: Scoping and Screening Review



- Section 2.1 Scoping and Screening Methodology
- On-site Audit June 6 June 9, 2006
- Pilgrim included all system components in scope if any components were (a)2 – exceptions stated

Section 2.3

4 Additional Components Brought Into Scope

Section 2.2, 2.4, 2.5

No Omissions

Section 2: Scoping and Screening Review



<u>Section 2.3</u> – Mechanical Systems

- <u>Open Item 2.3.3.6</u>: Security Diesel
 - LRA Did not Include System Drawings
 - Referred to Regional Inspector to Determine
 System Components in Scope
 - Staff Considered the 3/9/2007 Inspector Input
 Adequate to Close the Open Item

Section 2: Scoping and Screening Summary



- The Applicant's Scoping Methodology Meets The Requirements Of 10 CFR Part 54.4
- Scoping And Screening Results, As Amended, Included All SSCs Within The Scope Of License Renewal And Subject To AMR



License Renewal Inspections

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Glenn Meyer

Region I

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Scoping and Screening



- 54.4(a)(2) Non-safety SSCs Whose Failure Could Impact Safety SSCs
- Spatial and Structural Interactions
- LRA Drawings and Procedures Reviewed
- Plant Walkdowns Performed

Scoping and Screening Conclusions



- Spatial Interaction Acceptable
- Structural Interaction Corrected
- Scoping and Screening Acceptable for License Renewal

Aging Management



- Reviewed 26 AMP Programs
- Reviewed Programs, Evaluations, and Records
 - Program Procedures
 - Operational Experience Information
 - Prior Pilgrim Issues
- Performed Plant Walk Downs
- Interviewed Cognizant Personnel

Inspection Conclusions



- Scoping and Aging Management Programs Support Conclusion That Aging Effects will be Managed
- Drywell Shell Monitoring

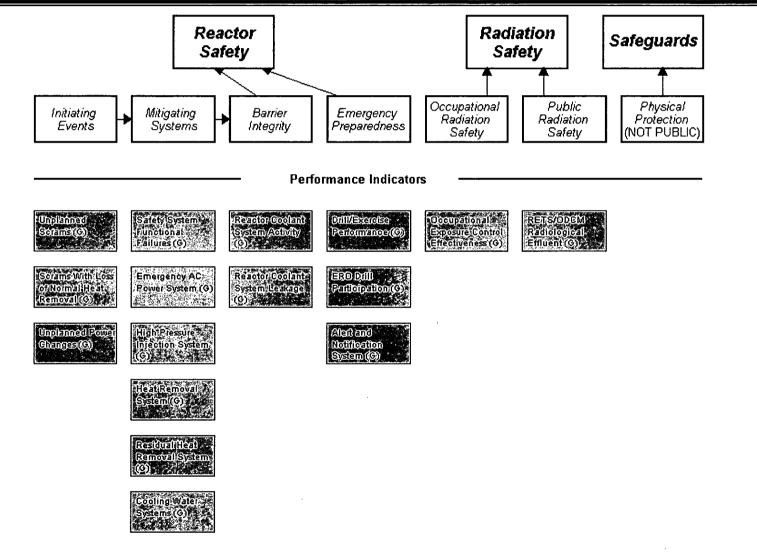
Current Performance



- Licensee Response Column (Column I) of the NRC's Action Matrix – Green PIs and Findings
- No Cross-cutting Issues
- Reactor Oversight Process Baseline Inspections



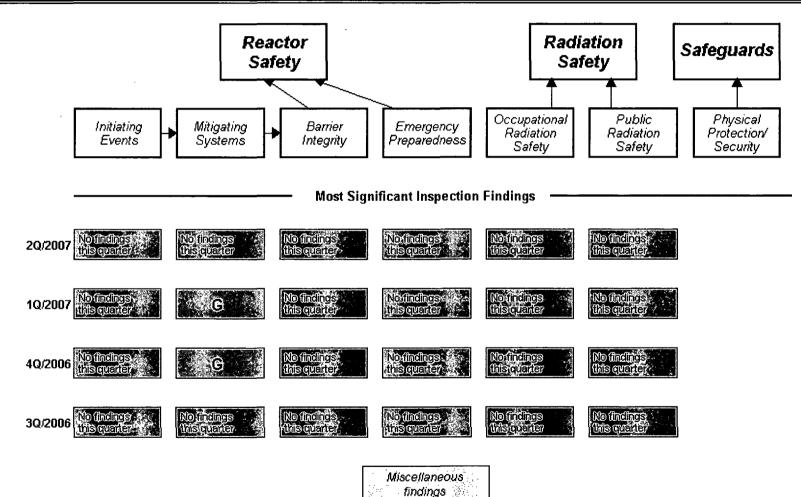
Performance Indicators



15



Inspection Findings





Pilgrim Nuclear Power Station Aging Management Review Time Limited Aging Analysis Open Items

Fire Protection Program (B.1.13.1)



- <u>Open Item 3.0.3.2.10</u>:
 - Applicant did not Adequately Address how to Manage the Aging Effects of Inaccessible Seals.
 - Applicant Stated (ACRS) and Documented (June 2007) That There are Actually No Inaccessible Seals at PNPS

Containment Inservice Inspection Program (B.1.16.1)



- Open Item 3.0.3.3.2:
 - Regional Inspection Documented:
 - Inoperative Bellows Rupture Drain Flow Switch
 - Drain Monitoring Inconclusive & Undocumented
 - Water on Torus Room Floor

Containment Inservice Inspection Program (B.1.16.1)



- <u>Open Item 3.0.3.3.2</u>:
 - Replace Switches Now and in 15 years
 - Identified Non-Aggressive Groundwater as Source of Water on Torus Room Floor
 - Tested November 2006 and June 2006
 - Provided Documentation of Drain Monitoring
 - Committed to Obtain Drywell UT Data

Containment Inservice Inspection Program (B.1.16.1)



- Open Item 3.0.3.3.2:
 - Torus Structure
 - Provided Evaluation of Effect on Torus Basemat
 - Commitments to Evaluate Groundwater/Torus Water
 - Commitment to Inspect Condition of Torus Hold Down Bolts and Grout



- Six TLAAs Affected by Neutron Fluence
 - Reactor Vessel Fluence
 - Pressure-Temperature Limits
 - Upper Shelf Energy
 - Adjusted Reference Temperature
 - Circumferential Weld Inspection Relief
 - Axial Weld Failure Probability



- <u>Open Item 4.2</u>
 - Pilgrim The First BWR-3 to Use RAMA
 Methodology to Calculate Neutron Fluence
 - Dosimetry Data was not Available with Which to Benchmark the RAMA Calculated Results
 - Result Fluence Calculation Not Acceptable
 Per Reg Guide 1.190



- <u>Open Item 4.2</u>
 - Applicant's Back Calculation of Limiting
 Fluence Values Considered Acceptable by the
 Staff
 - TLAA Identified Which Established the Limiting Fluence Value
 - Axial Welds @ RV Inner Surface 3.37 x 10¹⁸ n/cm2 (E > 1.0 MeV)



• <u>Open Item 4.2</u>

- <u>License Condition 4.2.6</u>: On or before June 8, 2010, the applicant (Entergy) will submit to the NRC correctly benchmarked RV neutron fluence calculations, consistent with RG 1.190, that will confirm that the neutron fluence for the lower intermediate shell axial welds, at the inner surface of the RV, will not reach the limiting value of 3.37×10^{18} n/cm2 (E > 1.0 MeV) by the end of the period of extended operation (54 EFPY).



- <u>Open Item 4.2</u>
 - <u>Commitment 47</u>: Submit to the NRC An Action
 Plan for Benchmarking the Reactor Pressure
 Vessel Fluence Evaluation.
 - Entergy Plan Submitted August 23, 2007.



Section 4.3: Metal Fatigue

- Reactor Water Environment
 - Removed Exception to Fatigue Monitoring
 Program regarding Environmentally Assisted
 Fatigue.
 - Combined FMP and EAF FMP is Now Consistent with GALL.

Conclusions



 On the basis of its review of the LRA, with the closing of Open Items 2.3.3.6, 3.0.3.2.10, 3.0.3.3.2 and 4.2, the staff determines that the requirements of 10 CFR 54.29(a) have been met.



Questions