RAS J-24

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the matter of
Entergy Corporation
Pilgrim Nuclear Power Station
License Renewal Application

Docket # 50-293

April 1, 2008

PILGRIM WATCH REPLY TO ENTERGY'S RESPONSE IN OPPOSITION TO PILGRIM WATCH MOTION TO PERMIT LATE FILED EXHIBITS

Pilgrim Watch Replies to Entergy's Response in Opposition to Pilgrim Watch's Motion to Permit Late Filed Exhibits, March 31, 2008. Pilgrim Watch disputes Entergy's argument for the following reasons.

1. All the Exhibits that we requested to file are from Entergy's Disclosures; and being so, there is no prejudice to Entergy since they are their own documents. Additionally they should not prejudice NRC Staff or any other party because they were provided to the Service List during the course of these proceedings.

2. Pilgrim Watch's request was submitted on March 24, eighteen days before the Oral Hearing; whereas, the adjudication process allows new exhibits to be introduced the day of the oral hearing. [ASLB's Order, March 24, 2008 Section C says that, "Each party should bring sufficient copies of any new or modified exhibits to the oral hearing for all board members and other parties."] It is understandable that late filed exhibits, up to the very day of the hearing, are allowed because Pilgrim Watch, like all parties, is on a learning curve. Therefore as familiarity with the subject increases pertinent pieces in the disclosures jump out that were heretofore overlooked.

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SECY-02

3. Entergy's objection, at 4, that the requested exhibits are "highly prejudicial" seems unlikely. Instead, we suspect that Entergy wishes to hide from the board some of their own information because it may show that the aging management program is insufficient; just as they attempted to keep monitoring wells off the table because, if they were required to be added as a supplement to the aging management program, leaks may become evident to NRC and the public.

For example, does Entergy regard it as an "inconvenient truth" that their own document said that "The piping that is underground is protected by a coating, but since the coating does not have a specified life, the aging effects will be evaluated for carbon steel;"[1] or that the manufacturer of coatings cannot guarantee their expected life because there are too many variables? [2]

Is it another "inconvenient truth" to keep hidden from the board that Entergy's own people recognize the limitations of Ultrasonic Testing? Emails between Alan Cox and Ted Ivy (10/19/05) said that,[3]

> Ted Ivy: "...this technology tells us that there is thinning but it can't tell us what is causing it. The other question I have is has the technology been proven and can it be used for small bore piping such as fuel oil? No one has done this before and we need to be careful."
>
> Alan Cox: "I agree that we need to carefully couch this. However it seems that if we find thinning, we must determine what is causing it. If it is not internal corrosion, then we would have to dig it up anyway to determine the cause. This

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[1] Exhibit 43, PILLR00000658:

[2] Exhibit 46, PILLR00000295: Email Ted Ivy to Potts (10/28/06) – Region Inspection Item 569- "Unfortunately I do not know of any to approach this question unless we could possibly come up with something that shows the coatings installed on the in scope buried components are good for 40 years" such that there is no reason to inspect prior to 40 years. The piping spec M300 doesn't cover coatings." Exhibit 47, PILLR00045431 (11/19/07) Request: Inquiry Entergy to Tapecoat Company regarding manufacturer's recommended service life for coating and wrapping that has been applied to buried piping in accordance PNPS Specification M306? Response: "The coating product alone does not establish the expected service life of a protective coating system. Additional factors such as surface cleanliness, surface preparation, and severity of service (soil conditions) also play a large role in expected service life. Since the manufacturer does not control applications he does not predict expected service life."

[3] "Exhibit 45, PILLR00000293

technology may only help you if it can tell you there is unacceptable thinning. We may be a little too strong in saying that the technology provides indication of wall thickness without excavation. I think the technology may do this, but it hasn't been effectively demonstrated (or maybe it just hasn't gained general acceptance yet).

3. The board's March 24 Order explained that all parties should, "Remove all prior markings on the exhibit." Pilgrim Watch has now done so.

4. Entergy incorrectly complains that "Pilgrim Watch failed to consult prior to filing the motion" (Section C, at 11). In point of fact Mary Lampert called the office and left a message on David Lewis' answering machine. A copy of the March 24 email sent to all parties is attached. The Attachment indicates that both the motion and certificate of service were sent. Further David Lewis emailed me on March 24, 2008 saying that he did not receive one set of exhibits, email attached. The transmission error was corrected.

5. Further, Pilgrim Watch believes that these exhibits should be allowed so that as much information will be put on the table April 10, 2008; thereby increasing the likelihood that the issue will be resolved in a timely manner and reducing the likelihood of lengthy appeals.

The central point is that we believe that the exhibits are pertinent. It should be left to the board to exercise their own judgment about what is and what is not relevant to this case in order for them to make the best and fairest decision. A copy of the exhibits is reattached for your convenience.

Thank-you for your consideration,

Mary Lampert
Pilgrim Watch, pro se
148 Washington Street
Duxbury, MA 02332

ATTACHMENT

A. Summary of Disclosures Requested To File

1. Disclosures describing the buried piping under consideration – description components, corrosion mechanisms, operating experience, aging management.

a) Stand by Gas Treatment System:

Exhibit 27, PILLR00000583: Aging Management Review SGTS 04/19/05 "The internal surface of the buried pipe may be wetted by condensation since the ground temperature may be lower that the dew point of the air. Therefore loss of material from general, pitting, crevice corrosion and MIC is an aging effect requiring management..."

Exhibit 28, PILLR00000586: Aging Management Review SGTS [Draft E 10/07/05] same comment above, "The internal surface of the buried pipe may be wetted by condensation since the ground temperature may be lower that the dew point of the air. Therefore loss of material from general, pitting, crevice corrosion and MIC is an aging effect requiring management..."

Exhibit 29, PILLR00003609: Email to Ted Ivy from Andrew Taylor 04/18/05

> "...due to the cooling effect of the soil through which the underground piping passes. Therefore this section of piping would be a "worst case" for loss of material which would <u>not</u> be bounded by the effects detectable by an external system walk-down at other places in the system."

Exhibit 30, PILLR000000633, 639, 641, 642, 643,649, 650: Verification of PNPS License Review Project, Aging Management Review of the Standby Gas treatment System.

b) Condensate Storage System Piping:

Exhibit 31, PILLR00003278: LRA Technical Information (10/06/05) Buried Piping Inspection – hand written note "We will be using new phased UT Technology on the HPCI/RCIC piping from the CST. Alternate inspection method"

Exhibit 32, PILLR00003225 & 3228, Pilgrim NPS License Renewal Project Aging Management Review of CSS - describes component (stainless steel), aging effects and management plan.

c) Salt Water Service Piping

Description

Exhibit 33, PILLR00000939: 'Some carbon steel is …below ground."

Exhibit 34, PILLR00000940: "Components underground …and continuously wetted may be protected by a coating. Since the coating does not have a specified life, aging effects are evaluated as if the carbon steel was not coated." [And] "Titanium piping…used in sections of SSW system."

Condition Reports:

Exhibit 35, PILLR00044657 &44658 Condition Report test pieces west end CIPP liner at "A" SSW discharge line thickness measurements below minimum requirement. 04/28/03

Exhibit 36, PILLR00045284: SSW patch near MO-3805 spraying water through pinhole leak (02/26/99)

Exhibit 37, PILLR00045281: SSW Pipe Spool JF29-10-8 (2) area found below min wall of 160" per spec. M591 (2/12/99)

Exhibit 38, PILLR00045276- severe OD SSW Pipe Corrosion/Pitting on spools of J-29-7-3, 10-6, 10-7 and 10-9 does not permit 10% UT coverage as required (02-11-99)

Exhibit 39, PILLR00044661 Condition Report – corrosion on SSW pipe Spool JF29-15-9(P-208D Discharge pipe spool downstream of 29-HO-3817 valve).

Visual inspection performed- corrosion appears to be exterior pipe wall only. No pressure boundary leakage observed with 34 psi (pressure observed at PI-3822). This indicates to Entergy rubber lining still intact and internals not affected. Exterior corrosion opined as most likely result excessive salt service water pump packing leakage that had been experienced for a periods of time due to pump shaft coating degradation. Visual inspection also performed remaining SSW pump discharge pipe spools without finding severe corrosion.

CIPP Lining & Description Piping:

Exhibit 40, PILLR0046040: PNPS Specification for Cured in Place (CIPP) Lining For SSW Discharge Piping [02/17/03] Provides description discharge piping – [3]piping 22" nominal diameter carbon steel pipe, .375 wall thickness with 3/16' natural rubber lining; flange connections rubber-lined Pressure Class 150 flat-faced slip on flanges. [4] Loop A discharge is approximately 240' (total length) with (3) 45 degree elbows and (1) 90 degree long radius elbow. [5] Loop "B" discharge piping is approximately 225 ft (total length t be lined) with (4) 45 degree elbows and (1) 90-degree long radius elbow.

Operating Experience:

Exhibit 41, PILLR00003495 Table 3.1.1 Operating Experience Applicable to Non-Class 1 Mechanical Systems – CR-PNP-2004-00391-

Issue: Item: Salt service water pipe spool JF29-15-9 (P-208D discharge pipe spool downstream of 29-HO-3817 isolation valve is corroded. Evaluation: Loss of material due to corrosion is an aging effect identified in the mechanical tools of carbon steel in raw water. Item: System Engineer Interview SSW. Issue: Salt Service water system has experiences wall thinning due to corrosion of piping, pumps, and the channel assemblies on heat exchangers. Evaluation: Loss of material due to corrosion is an aging effect identified in the mechanical tools of carbon steel in raw water.

Item: System Engineer Interview SSW. Issue: Three on-line wall leaks occurred due to corrosion following loss of rubber lining inside salt service water system

pipe spools sections. (Reference CR-98-9143, 98-9392, 01-9397). Evaluation: Loss of material due to corrosion is an aging effect identified in the mechanical tools of carbon steel in raw water.

Item: System Engineer Interview SSW. Issue: salt water system has experienced external corrosion due to salt-water environment. Evaluation: Loss of material due to corrosion is an aging effect identified in the mechanical tools of carbon steel in raw water.

Aging Management:

Exhibit 42, PILLR00000855: Verification of PNPS License Renewal Project Report Rev.0, (Draft G) 6/20/05. (3.1) Carbon Steel Components: SSW system includes carbon steel components (including cast iron), the majority of which are rubber lines. For identifying aging effects the liner is not credited with a protective function, aging effects are identified for carbon steel in contact with salt water. Corrosion effects are discussed herein. Components that are underground and continuously wetted may be protected by coating. "Since the coating does not have a specified life, aging effects are evaluated as if the carbon steel were not coated." Loss of material due to general corrosion, pitting corrosion, crevice corrosion, MIC, and galvanic corrosion is an aging effect requiring management. Loss of material from selective leaching is an aging effects requiring management for gray cast iron components."(3.2) Titanium Components: "Titanium is inherently resistant to general corrosion, pitting corrosion, crevice corrosion, and erosion in raw water at temperatures less than 160F. However, in raw water, MIC can result in loss of material from titanium. Therefore, loss of material due to MIC is an aging effect requiring management for internal surfaces." "Loss of material die to MIC from external buried surfaces is an aging effect requiring management." 4.3 BPTIP and 4.4 Service Water Integrity Program provide brief descriptions

Exhibit 43, PILLR00000658: AMRM-11 Aging Management Review of the SSW (Draft 11/12/01)

(3.1) "The piping that is underground is protected by a coating, but since the coating does not have a specified life, the aging effects will be evaluated for carbon steel."

(4.3) Wall thinning inspection program- Since the SSW is required to be seismically qualified, sample inspections are required to verify that the carbon steel pipe and components are maintained with an adequate wall thickness to remain seismically qualified."

2. Three Disclosures Discuss Limitations BPTIP Methodology.

a) Sampling

Exhibit 44, PILLR00003618: Email from Ted Ivy to David Lach (05/16/05), "On the buried piping question we have committed to do an inspection however the scope is not determined. It may only be one system if the coating of all the in scope piping is the same. We don't plan on inspecting piping in each system unless forced to do so. This really doesn't tell you anything since the pipe next to where you dug up may be degraded and t you will never know it." (*Note that they are referring to fire protection piping however the sampling comments have general application to inspection methodology for pipes that we are considering*)

b) UT

Exhibit 45, PILLR00000293: Emails between Alan Cox and Ted Ivy (10/19/05) Re BPTIP –

Ted Ivy: "...this technology tells us that there is thinning but it can't tell us what is causing it. The other question I have is has the technology been proven and can it be used for small bore piping such as fuel oil? No one has done this before and we need to be careful."

Alan Cox: "I agree that we need to carefully couch this. However it seems that if we find thinning, we must determine what is causing it. If it is not internal corrosion, then we would have to dig it up anyway to determine the cause. This technology may only help you if it can tell you there is unacceptable thinning. We may be a little too strong in saying that the technology provides indication of wall thickness without excavation. I think the technology may do this, but it hasn't

been effectively demonstrated (or maybe it just hasn't gained general acceptance yet).

c) **Coatings - life expectancy**

Exhibit 46, PILLR00000295: Email Ted Ivy to Potts (10/28/06) – Region Inspection Item 569- "Unfortunately I do not know of any to approach this question unless we could possibly come up with something that shows the coatings installed on the in scope buried components are good for 40 years" such that there is no reason to inspect prior to 40 years. The piping spec M300 doesn't cover coatings."

Exhibit 47, PILLR00045431 (11/19/07) Request: Inquiry Entergy to Tapecoat Company regarding manufacturer's recommended service life for coating and wrapping that has been applied to buried piping in accordance PNPS Specification M306? Response: "The coating product alone does not establish the expected service life of a protective coating system. Additional factors such as surface cleanliness, surface preparation, and severity of service (soil conditions) also play a large role in expected service life. Since the manufacturer does not control applications he does not predict expected service life."

3. Disclosure reviews substandard/counterfeit parts – specifically flanges in buried components.

Exhibit 48, PILLR00005493(10/09/1988); NRC Bulletin 88-05 and Supplements 1&2: Nonconforming materials Supplied by Piping Supplies, Inc at Folsom, NJ and West New Jersey Manufacturing Company at Williamstown, NJ; and BECO's response to NRC Bulletin to review records, identify questionable materials supplied by two companies, and test and evaluate materials to determine compliance code. Fifty-two located in the plant- all installed found by BECO to be acceptable, except one. Fifty-five flanges known to have been ordered and received, were not located. All installed flanges tested fell into acceptance range –

six inaccessible for in situ testing - four 22" flanges in a buried section of SSW piping "B" loop), page 11. Those were determined by BECO to be acceptable, at 12.

4. Disclosure Radioactive Contaminants in systems.

Exhibit 49, PILLR00004199: Email from Chan (06/06/06)

[1] "Confirm that you test the following systems for radioactivity contamination: SGTS (Sejkora): discharges only air (no liquids) to main stack – analyzes only gamma emitters no tritium. SSW (Smalley): daily grab samples-analyzed only gamma-no tritium. (Loomis): CST water analyzed monthly for gamma emitters. Tritium not routinely done..."

5. Ground Water Testing

Exhibit 50, PILLR00045349 SAIC Engineering Report (01/05/06) results analysis groundwater sample MW-4 on October 27, 2005 – monitoring well that had been installed to monitor oil leak, now claimed to be the control well in new 4-well NEI monitoring initiative.

Exhibit 51, PILLR00045343 SAIC Engineering Report (07/17/06) results analysis groundwater sample MW-4 on June 13, 2006 – monitoring well that had been installed to monitor oil leak, now claimed to be the control well in new 4-well NEI monitoring initiative.

6. Chemistry Control Condition Reports, Exhibit 52

PILLROOO45108;45112;45116;45432;45431;44867;44883;44897;44981;45043;45055;
45095;44871;44886;44900;44985;45046;45058;44875;44889;44904;44991;45034;45049
;
45063; 44938

The 21 CCR examples are a sample, not exhaustive list. The majority did not require "operability" or "reportability." However they evidence problems with the water chemistry program that Entergy points to as a method to prevent corrosion. Also included is a PNPS Chemistry Corporate Assessment (01/12/04) highlighting areas of needed improvement and actual and potential consequences problems identified.

B. Email to Service List from Mary Lampert, March 24, 2008 [original copy mailed]

From:	Mary Lampert [mary.lampert@comcast.net]
Sent:	Monday, March 24, 2008 4:01 PM
To:	Ann Young(NRC); David Lewis; David Roth; James Adler(NRC); Johanna Thibault (NRC) (Johanna.Thibault@nrc.gov); Kevin Nord; Kimberly A Sexton(NRC); 'Mark Sylvia'; 'ocaamail'; Paul Abramson (Paul.Abramson@nrc.gov); Paul Gaukler; Richard Cole; Richard MacDonald; SECY Hearing Doc(NRC); Sheila Hollis(PlyAttorney); Susan Uttal; Zachary Kahn
Subject:	Pilgrim Watch Motion to Permit Late Filed Exhibits
Attachments:	Pilgrim Watch Motion Requesting Permission File Late Filed Exhibits 03.24.08.docx; Certificate Service Motion To Permit Late Filled Exhibits 03.24.08.doc

Hello:

Please Find Pilgrim Watch Motion to Permit Late Filed Exhibits and Certificate of Service.

Emails will follow with attachments; because they are scanned documents, my server limits the number that may be sent at one time. They will be in 11 emails and include: PW Exhibits 27-30; 31-32; 33-39; 40 &41; 42 &43; 44-47; 48; 49-51; 52A; 52B; 52C.

I apologize for the inconvenience.

If you have difficulty in receiving this document, please call Mary lampert at 781-934-0389.

Thank-you and have a nice day.

Mary

C. Email from David Lewis to Mary Lampert, March 24, 2008 [original mailed]

From:	Mary Lampert [mary.lampert@comcast.net]
Sent:	Monday, March 24, 2008 4:33 PM
To:	'Lewis, David R.'
Cc:	Ann Young(NRC); David Roth; James Adler(NRC); Johanna Thibault (NRC) (Johanna.Thibault@nrc.gov); Kevin Nord; Kimberly A Sexton(NRC); 'Mark Sylvia'; 'ocaamail'; Paul Abramson (Paul.Abramson@nrc.gov); Paul Gaukler; Richard Cole; Richard MacDonald; SECY Hearing Doc(NRC); Sheila Hollis(PlyAttorney); Susan Uttal; Zachary Kahn
Subject:	RE: Pilgrim Watch requested late filed Exhibits 40 -41
Attachments:	PW Exhibits 40. 41.pdf

Thanks!
From: Lewis, David R. [mailto:david.lewis@pillsburylaw.com]
Sent: Monday, March 24, 2008 4:15 PM
To: Mary Lampert
Subject: RE: Pilgrim Watch requested late filed Exhibits 40 -41

Mary, there was no attachment to this message.

David R. Lewis | Partner
Pillsbury Winthrop Shaw Pittman LLP

Tel: 202.663.8474 | Fax: 202.663.8007 | Cell: 703 501 7708
2300 N Street, NW | Washington, DC 20037-1122

Email: david.lewis@pillsburylaw.com
www.pillsburylaw.com

From: Mary Lampert [mailto:mary.lampert@comcast.net]
Sent: Monday, March 24, 2008 4:09 PM
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To: Mary Lampert
Subject: RE: Pilgrim Watch requested late filed Exhibits 40 -41

Mary, there was no attachment to this message.

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Email: david.lewis@pillsburylaw.com
www.pillsburylaw.com

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To: Ann Young(NRC); Lewis, David R.; David Roth; James Adler(NRC); Johanna Thibault (NRC); Kevin Nord; Kimberly A Sexton(NRC); 'Mark Sylvia'; 'ocaamail'; Paul Abramson; Gaukler, Paul A.; Richard Cole; Richard MacDonald; SECY Hearing Doc(NRC); Sheila Hollis(PlyAttorney); Susan Uttal; Zachary Kahn
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Thank-you,

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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the matter of Docket # 50-293-LR

Entergy Corporation

Pilgrim Nuclear Power Station

License Renewal Application April 1, 2008

CERTIFICATE OF SERVICE

I hereby certify that Pilgrim Watch's Reply to Entergy's Response in Opposition to Pilgrim watch Motion to Permit Late Filed Exhibits was served April 1, 2008 by electronic mail and by U.S. Mail, First Class to each of the following:

Administrative Judge
Ann Marshall Young, Chair
Atomic Safety and Licensing Board
Mail Stop – T-3 F23
US NRC
Washington, DC 20555-0001

Administrative Judge
Richard F. Cole
Atomic Safety and Licensing Board
Mail Stop –T-3-F23
US NRC
Washington, DC 20555-0001

Administrative Judge
Paul B. Abramson
Atomic Safety and Licensing Board
Mail Stop T-3 F23
US NRC
Washington, DC 20555-0001

Secretary of the Commission
Attn: Rulemakings and Adjudications Staff
Mail Stop 0-16 C1
United States Nuclear Regulatory Commission [Two Copies]

Office of Commission Appellate Adjudication
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Washington, DC 20555-0001

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