

RAS J-62

U.S. NUCLEAR REGULATORY COMMISSION

In the Matter of Entergy (Pilgrim Nuclear Power Station)

Docket No. 50-293-LR Official Exhibit No. 32

OFFERED by: Applicant/Licensee (Inten. Pilgrim Watch Ex 19

NRC Staff Other

DOCKETED  
UISNRC

April 15, 2008 (10:00am)

IDENTIFIED on 4-10-08 Witness Panel

OFFICE OF SECRETARY  
RII EMAKINGS AND  
ADJUDICATIONS STAFF

Action Taken: ADMITTED REJECTED WITHDRAWN

Reporter/Clk: Thibault

Pilgrim Nuclear Power Station  
License Renewal Application  
Technical Information

water samples and periodic areal density measurements, and (3) analysis of criticality to assure that the required 5% subcriticality margin is maintained.

A.2.1.2 Buried Piping and Tanks Inspection Program

The Buried Piping and Tanks Inspection Program includes (a) preventive measures to mitigate corrosion and (b) inspections to manage the effects of corrosion on the pressure-retaining capability of buried carbon steel, stainless steel, and titanium components. Preventive measures are in accordance with standard industry practice for maintaining external coatings and wrappings. Buried components are inspected when excavated during maintenance. If trending within the corrective action program identifies susceptible locations, the areas with a history of corrosion problems are evaluated for the need for additional inspection, alternate coating, or replacement.

A focused inspection will be performed within the first 10 years of the period of extended operation, unless an opportunistic inspection (or an inspection via a method that allows assessment of pipe condition without excavation) occurs within this ten-year period.

A.2.1.3 BWR CRD Return Line Nozzle Program

Under the BWR CRD Return Line Nozzle Program, PNPS has cut and capped the CRD return line nozzle to mitigate cracking and continues inservice inspection (ISI) examinations to monitor the effects of crack initiation and growth on the intended function of the control rod drive return line nozzle and cap. ISI examinations include ultrasonic inspection of the nozzle-to-vessel weld and ultrasonic inspection of the dissimilar metal weld overlay at the nozzle.

A.2.1.4 BWR Feedwater Nozzle Program

Under the BWR Feedwater Nozzle Program, PNPS has removed feedwater blend radii flaws, removed feedwater nozzle cladding, and installed a triple-sleeve-double-piston sparger to mitigate cracking. This program continues enhanced inservice inspection (ISI) of the feedwater nozzles in accordance with the requirements of ASME Section XI, Subsection IWB and the recommendation of General Electric (GE) NE-523-A71-0594 to monitor the effects of cracking on the intended function of the feedwater nozzles.

A.2.1.5 BWR Penetrations Program

The BWR Penetrations Program includes (a) inspection and flaw evaluation in conformance with the guidelines of staff-approved boiling water reactor vessel and internals project (BWRVIP) documents BWRVIP-27 and BWRVIP-49 and (b) monitoring and control of reactor coolant water chemistry in accordance with the guidelines of BWRVIP-130 to ensure the long-term integrity of vessel penetrations and nozzles.

Temp = SECY-028

DSO3

## B.1.2 BURIED PIPING AND TANKS INSPECTION

### Program Description

The Buried Piping and Tanks Inspection Program at PNPS is comparable to the program described in NUREG-1801, Section XI.M34, Buried Piping and Tanks Inspection.

This program includes (a) preventive measures to mitigate corrosion and (b) inspections to manage the effects of corrosion on the pressure-retaining capability of buried carbon steel, stainless steel, and titanium components. Preventive measures are in accordance with standard industry practice for maintaining external coatings and wrappings. Buried components are inspected when excavated during maintenance.

A focused inspection will be performed within the first 10 years of the period of extended operation, unless an opportunistic inspection (or an inspection via a method that allows assessment of pipe condition without excavation) occurs within this ten-year period.

### NUREG-1801 Consistency

The Buried Piping and Tanks Inspection Program at PNPS will be consistent with program attributes described in NUREG-1801, Section XI.M34, Buried Piping and Tanks Inspection, with one exception.

### Exceptions to NUREG-1801

The Buried Piping and Tanks Inspection Program at PNPS will be consistent with program attributes described in NUREG-1801, Section XI.M34, Buried Piping and Tanks Inspection, with the following exception.

Attributes Affected	Exception
4. Detection of Aging Effects	Inspections via methods that allow assessment of pipe condition without excavation may be substituted for inspections requiring excavation solely for the purpose of inspection. <sup>1</sup>

#### Exception Note

1. Methods such as phased array UT technology provide indication of wall thickness for buried piping without excavation. Use of such methods to identify the effects of aging is preferable to excavation for visual inspection, which could result in damage to coating or wrappings.

**Enhancements**

None

**Operating Experience**

The Buried Piping and Tanks Inspection Program at PNPS is a new program for which there is no operating experience.

**Conclusion**

Implementation of the Buried Piping and Tanks Inspection Program will provide reasonable assurance that effects of aging will be managed such that applicable components will continue to perform their intended functions consistent with the current licensing basis for the period of extended operation.