

## IPRenewal NPEmails

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**From:** Kimberly Green  
**Sent:** Monday, December 29, 2008 10:45 AM  
**To:** STROUD, MICHAEL D  
**Cc:** Tyner, Donna; IPRenewal NPEmails  
**Subject:** Follow Up Draft RAI

Mike,

Based on our discussion during the 12/17 telecon, the staff reviewed its request in D-RAI 2.3.4.5-2 regarding the AFW pump room fire event. Because there are two aspects to the question (scoping and screening and aging management review), the staff decided to split the question into two questions. The revised D-RAI 2.3.4.5-2 was transmitted to you in an email dated 12/19. This email transmits the second question below. Please let me know if you need a telecon to discuss the D-RAI.

### **D-RAI 3.4.2-1**

In LRA Section 3.4.2, the applicant summarizes its AMR results for the IP2 auxiliary feedwater pump room fire event. In the LRA, the applicant states that

The components in the systems required to supply feedwater to the steam generators during the short duration of the fire event are in service at the time the event occurs or their availability is checked daily. Therefore, integrity of the systems and components required to perform post-fire intended functions for at least one hour is continuously confirmed by normal plant operation. During the event these systems and components must continue to perform their intended functions to supply feedwater to the steam generators for a minimum of one hour. Significant degradation that could threaten the performance of the intended functions will be apparent in the period immediately preceding the event and corrective action will be required to sustain continued operation. For the minimal one hour period that these systems would be required to provide make up to the steam generators, further aging degradation that would not have been apparent prior to the event is negligible. Therefore, no aging effects are identified, and no Summary of Aging Management Review table is provided.

Section 54.21(a)(1) of 10 CFR requires that for those systems, structures, and components within the scope of license renewal, as delineated in § 54.4, applicants must identify and list those structures and components subject to an aging management review. Additionally, Section 54.21(a)(3), requires that for each structure and component identified in paragraph 54.21(a)(1), applicants must demonstrate that the effects of aging will be adequately managed so that the intended function(s) will be maintained consistent with the CLB for the period of extended operation. Based on the information contained in the LRA, Entergy has not demonstrated that the effects of aging for passive, long-lived components within the systems credited for providing flow to the steam generators during the fire event will be adequately managed.

For those systems, or portions thereof, that are identified in response to RAI 2.3.4.5-2, part c, the staff requests that the applicant provide a list of passive, long-lived component types, material, environment, and aging effect combinations, and the programs that will be used to manage the aging effects.

Thanks,  
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