PrairieIslandNPEm Resource

From: Richard Plasse
Sent: Tuesday, November 18, 2008 4:45 PM
To: Eckholt, Gene F.
Attachments: PINGP_RAIs_PAV_0919.doc

additional draft AMP RAIs

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RAI B2.1.3-1

The staff noted that the applicant, in LRA Appendix B2.1.3, describes the present approved Prairie Island Inservice Inspection (ISI) program for the fourth ISI interval. Specified limitations, modifications and NRC approved alternatives described in Appendix B2.1.3 only apply to the fourth ISI interval. Please describe how PINGP will implement the ISI program during the period of extended operation.

RAI B2.1.27-1

The staff reviewed LRA Appendix B2.1.27, Nickel-Alloy Nozzles and Penetrations Program and noted that there was no operating experience associated with this program. The staff also noted that this program is credited for managing primary water stress corrosion cracking (PWSCC) of three components: Pressurizer Surge Nozzle, Core Support Pads, and Instrumentation Tube Penetrations (Bottom Head). Please provide operating experience for these components including inspection methods and results and any mitigative measures taken to manage PWSCC.

RAI B2.1.8-1

During discussions between the staff and the applicant it was reveled to the staff that high tritium levels were discovered in on-site and off-site groundwater during the early days of plant operation. Please provide the cause of the elevated tritium and actions taken to reduce tritium levels. Do any systems subjected to the Buried Piping and Tanks Inspection Program contain or could contain radioactive material that could be released to the groundwater if piping or tanks leak? Please provide the details of all leak instances associated with systems subjected to the Buried Piping and Tanks Inspection Program and an assessment as to impact of such leaking on groundwater contamination.

RAI B2.1.8-2

In LRA AMP B2.1.8 the applicant stated that portions of buried coated carbon steel piping of the Cooling Water and Fire Protection Systems have been replaced as a result of Microbiologically-Influenced Corrosion (MIC) indications on the piping inside diameter. It is not clear what replacement material(s) were used or if coating or wrapping was used. Please specify what replacement materials were used and if the replacement piping was coated or wrapped?

RAI B2.1.8-3

In LRA AMP B2.1.8 the applicant stated that opportunistic or focused excavations and subsequent visual inspections will be performed on buried piping and tanks but does not identify how locations will be identified for inspection. Please identify how locations will be identified for excavation and inspection? If degradation is found during inspection, how will the inspection scope be expanded?

RAI B2.1.8-4

In its review of the program basis document, the staff noted that the applicant takes no credit for cathodic protection to manage loss material for buried piping and tanks. Is cathodic protection used at Prairie Island for buried piping and tanks and if so why is no credit taken for this mitigative technique for managing loss of material?

RAI B2.1.19-1

NUREG-1801, "Generic Aging Lessons Learned", (GALL) AMP XI.M30 recommends in the "monitoring and trending" element that particulate contamination concentrations are monitored in accordance with plant technical specifications or at least quarterly. The applicant stated in LRA B2.1.19 that particulate contamination testing of fuel oil will be performed annually and not quarterly; annual testing is sufficiently frequent to verify that particulates are not forming, and the absence of previous particulate contamination during routine historical sampling and analysis justifies a relaxed sampling frequency. The staff considers that operating history alone is not justification for relaxing sampling frequency. Provide additional justification for relaxation of sampling frequency.

RAI B2.1.19-2

GALL AMP XI.M30 recommends in the "monitoring and trending" element to monitor and trend biological activity at least quarterly. In its review of LRA B2.1.19 and the associated basis document, the staff noted that the applicant does not state whether or not fuel oil is tested for biological activity. Please confirm if microbiological activity is monitored in fuel oil? If so, what is the frequency of monitoring for microbiological activity? If not, why is lack of monitoring for biological activity not identified as an exception to GALL AMP XI.M30?

RAI B2.1.19-3

GALL AMP XI.M30 recommends, in the "preventive actions" and "detection of aging effects" elements, periodic cleaning and visual examination of fuel oil tanks. GALL AMP XI.M30 also recommends ultrasonic thickness measurement for locations where contaminants can accumulate such as tank bottoms in the "detection of aging" element to ensure significant degradation is not occurring. In its review of LRA B2.1.19 and the associated basis document, the staff noted that it is not clear if all fuel tanks that are not subjected to periodic cleaning and visual inspection of the tank interior, will be subjected to ultrasonic testing (UT) of the tank bottoms or the extent of UT of tank bottoms (grid size). The applicant states in LRA B2.1.19, "Exception to NUREG-1801", that day tanks and clean fuel oil leakage collection tanks of the diesel generators, and the day tanks of the diesel cooling water pumps and the diesel fire pump will not be subjected to cleaning and visual inspection. An enhancement to LRA B2.1.19 states that select tank bottoms will be subjected to UT. Please provide the results of all diesel fuel tank cleaning and inspection. Which fuel tanks will be subjected to ultrasonic testing (UT) of the tank bottom? What will be the extent of UT of tank bottoms (grid size)? Provide a list of specific fuel tanks (if any) that will not be subjected to periodic cleaning and visual inspection or UT. Provide a justification for not verifying that loss of material is occurring in fuel tanks that are not subjected to cleaning and visual inspection or UT.