	Official Transcript of Proceedings
NU	JCLEAR REGULATORY COMMISSION
Title:	Advisory Committee on Reactor Safeguards Plant License Renewal Subcommittee
Docket Number:	(not applicable)
Location:	Rockville, Maryland
Date:	Wednesday, April 4, 2007

Work Order No.: NRC-1513

Pages 1-193

NEAL R. GROSS AND CO., INC. Court Reporters and Transcribers 1323 Rhode Island Avenue, N.W. Washington, D.C. 20005 (202) 234-4433

	1
1	UNITED STATES OF AMERICA
2	NUCLEAR REGULATORY COMMISSION
3	+ + + +
4	ADVISORY COMMITTEE ON REACTOR SAFEGUARDS (ACRS)
5	MEETING OF THE PLANT LICENSE RENEWAL SUBCOMMITTEE
6	+ + + +
7	WEDNESDAY,
8	APRIL 4, 2007
9	The meeting was convened in Room T-2B3
10	of Two White Flint North, 11545 Rockville Pike,
11	Rockville, Maryland, at 10:30 a.m., Dr. Otto L.
12	Maynard, Chairman, presiding.
13	ACRS MEMBERS PRESENT:
14	OTTO L. MAYNARD Chairman
15	WILLIAM J. SHACK
16	THOMAS S. KRESS
17	GRAHAM B. WALLIS
18	J. SAM ARMIJO
19	SAID ABDEL-KHALIK
20	MARIO V. BONACA
21	
22	
23	
24	
25	

1	NRC STAFF PRESENT:
2	JIM BARTON
3	MAITRI BANERJEE
4	PERRY BUCKBERG
5	GLENN MEYER
6	JIM DAVIS
7	CLIFF MARKS
8	NAEEM IQBAL
9	KEN CHANG
10	LOUISE LUND
11	RICHARD CONTE
12	DUC NGUYEN
13	CLIFF MARKS
14	GLENN MEYER
15	NAEEM IQBAL
16	KEN CHANG
17	MATTHEW MITCHELL
18	LAMBROSE LOIS
19	
20	
21	
22	
23	
24	
25	

2

		3
1	ALSO PRESENT:	
2	ROBERT SMITH	
3	STEVE BETHAY	
4	BRIAN SULLIVAN	
5	ALAN COX	
6	BRYAN FORD	
7	FRED MOGOLESKO	
8	GARY DYCKMAN	
9	BARRY GORDON	
10	FRANZ-JOSEPH ULM	
11	TIM GRIESBACH	
12	RAY PACE	
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

		4
1	A-G-E-N-D-A	
2	OPENING REMARKS	3
3	INTRODUCTION AND BACKGROUND	7
4	Entergy	
5	OPEN ITEMS	99
6	Entergy	
7	NRC STAFF PRESENTATION	
8	Scoping and Screening Results 1	37
9	On site Inspection Results 1	44
10	NRC Audit	58
11	TLAA	69
12	SUBCOMMITTEE DISCUSSION	80

	5
1	P-R-O-C-E-E-D-I-N-G-S
2	10:29 a.m.
3	CHAIRMAN MAYNARD: Good morning. This
4	meeting will now come to order.
5	This is a meeting of the Plant License
6	Renewal Subcommittee. I'm Otto Maynard, Chairman of
7	the Pilgrim Plant License Renewal Subcommittee.
8	ACRS members in attendance, we have Mario
9	Bonaca. Said Abdel-Khalik, Sam Armijo, Graham Wallis,
10	Bill Shack, Tom Kress and our consultant for this, Mr.
11	Barton. And Ms. Maitri Banerjee of the ACRS staff is
12	the Designated Federal Official for this meeting.
13	The purpose of this meeting is to review
14	the license renewal application for the Pilgrim
15	Nuclear Station, the draft Safety Evaluation Report
16	and associated documents with focus on the unresolved
17	items in the Staff's draft Safety Evaluation Report.
18	We will here presentations from the representatives of
19	the Office of Nuclear Reactor Regulations and the
20	applicant, Entergy Nuclear Operations.
21	The Subcommittee will gather information,
22	analyze relevant facts and formulate a proposed
23	position and action as it is appropriate for
24	deliberation at the full Committee.
25	The rules for participation in today's
	I contraction of the second

(202) 234-4433

	6
1	meeting were announced as part of the notice of this
2	meeting previously published in the Federal Register
3	on March 23, 2007.
4	We have received no written comments or
5	requests for time to make oral statements from members
6	of the public regarding today's meeting.
7	We have provided telephone bridge
8	connections following requests from the members of the
9	public to listen in. And to avoid unnecessary
10	interruption and reduce the noise level, we request
11	that these telephone bridge lines be kept in mute.
12	A transcript of the meeting is being kept
13	and will be made available as stated in the Federal
14	Register notice. Therefore, we request that
15	participants in this meeting use a microphone located
16	throughout the meeting room when addressing the
17	Subcommittee. Participants should first identify
18	themselves and speak with sufficient clarity and
19	volume so that they can readily be heard.
20	We will now proceed with the meeting, and
21	I call upon the NRC Project Manager, Mr. Perry
22	Buckberg of the Office of Nuclear Reactor Regulation.
23	MR. BUCKBERG: Thank you. Good morning.
24	My name is Perry Buckberg, I'm the Project
25	Manager for the Staff review of the Pilgrim license

(202) 234-4433

	7
1	renewal.
2	Joining me is my Branch Chief Bob Shaft,
3	Deputy Division Director Louise Lund. From the Region
4	are Rich Conte and Glenn Meyer. Glenn Meyer is the
5	Inspection Team leader. Also joining me is Dr. Jim
6	Davis from NRR, who is the audit team leader. And the
7	technical reviewers are present as well.
8	We'll be presenting the results of the
9	Staff's review this afternoon. This morning, the
10	Pilgrim staff is going to present first. And let me
11	turn it over to Steve Bethay from Entergy.
12	CHAIRMAN MAYNARD: Good morning, Steve.
13	And before I turn it to you, I have looked through
14	your representation here. You've got a lot of slides,
15	a lot more than we can spend a lot of time on. I do
16	think you're hitting a number of the key issues,
17	especially towards the end there. I think some of the
18	information up in the beginning is important, but I
19	don't think you have to necessarily go over it line-
20	by-line. In fact, some of it I think you can put for
21	the record and see if there's any questions rather
22	than spend a lot of time going through that.
23	MR. BETHAY: Just on that point, my
24	intention wasn't to go through every picture and
25	drawing that we put in there. We put that in there for
	1

(202) 234-4433

ĺ	8
1	background information. There are a handful that when
2	we'll get to that portion I would like to emphasize,
3	but any point if you're good, I can move on.
4	The first part I can go through fairly
5	quickly. With that, I'll turn it over to Bob Smith
б	for brief introductory remarks. He's our Plant
7	Manager.
8	MR. SMITH: Good morning, Mr. Chairman.
9	Thank you for having us here.
10	My name is Bob Smith. I'm the General
11	Manager of Plant Operations for the Pilgrim Station.
12	We're pleased to be here today and to represent
13	Pilgrim for license renewal to the Committee on
14	Reactor Safeguards.
15	Steve Bethay, to my right, is our Director
16	of Nuclear Assurance. He will be our main speaker
17	today in presenting for Pilgrim. Also with us today
18	are members of our engineering department. Brian
19	Sullivan, to Steve's right, he's the Director of
20	Engineering.
21	And other members as I introduce you in
22	the audience, if you'd just raise your hand. Tom
23	White, Manager of Design. Ray Pace, Supervisor Design
24	Mechanical and Civil. Gary Dyckman, Senior Staff
25	Engineer.

(202) 234-4433

	9
1	Members of our Project Team for License
2	Renewal. Fred Mogolesko is our Project Manager at
3	Pilgrim. He's up front. Gary Young, our Corporate
4	Project Manager. Alan Cox, who is also a Project
5	Manager representing corporate following closely with
6	the Pilgrim project. And Dave Locke, Project Manager.
7	For our Licensing Group, we have John
8	McCann, Director of Licensing for corporate. Bryan
9	Ford, Licensing Manager at Pilgrim, and Brian's up
10	front. Jay Thayer is our Vice President for Operations
11	and on loan to the Nuclear Energy Institute.
12	And we have several members in the
13	audience from our license renewal teams at James A.
14	Fitzpatrick and Vermont Yankee Station.
15	That concludes my introductions. And I'd
16	like to turn it over to Steve Bethay.
17	MR. BETHAY: Good morning.
18	CHAIRMAN MAYNARD: And again, Steve, I'm
19	sure we're going to ask questions that will require
20	somebody from the audience. Again, everyone out here,
21	if you are asked question please come to a microphone
22	and identify yourself for answering.
23	MR. BETHAY: Okay. Just a point of order.
24	In the past there's been a microphone stand, so they
25	just come to this table or up to the front here.
	1

(202) 234-4433

	10
1	Okay.
2	CHAIRMAN MAYNARD: Yes.
3	MR. BETHAY: We'll get them to a
4	microphone.
5	CHAIRMAN MAYNARD: We'll get them to a
6	microphone, that's the main thing.
7	MR. BETHAY: We'll get to a microphone, if
8	need be.
9	CHAIRMAN MAYNARD: We may have one up here
10	by the time they're called upon.
11	MR. BETHAY: Okay. Terrific.
12	Well, i'll apologize in the beginning. I
13	have a terrible cold. If my voice starts to fade out,
14	I may have to stop for a sip of water.
15	My name is Steve Bethay, as Bob said. I'm
16	the Director of Nuclear Safety Assurance at Pilgrim,
17	and I'm the senior management sponsor for our license
18	renewal project at the plant. And I'll be serving as
19	the master of ceremonies today and directing questions
20	as appropriate to our team members.
21	I won't go over the list here.
22	MEMBER WALLIS: Slide one?
23	MR. BETHAY: Yes, sir.
24	MEMBER WALLIS: That big building is the
25	reactor building, right? The big cube is the reactor
	1

```
(202) 234-4433
```

	11
1	building?
2	MR. BETHAY: Yes, sir. Just very briefly
3	a side orientation
4	MEMBER WALLIS: Well
5	MR. BETHAY: Cape Code Bay intake channel,
6	reactor building
7	MEMBER WALLIS: Right.
8	MR. BETHAY: Turbine building.
9	MEMBER WALLIS: Now later on in the
10	pictures do you have pictures of ground water in this
11	presentation? But the lagoon intake seems to go right
12	up to the reactor building. So how does the ground
13	water compare with the sea water?
14	MR. BETHAY: We have a detailed discussion
15	on that.
16	MEMBER WALLIS: You're going to talk about
17	that later on?
18	MR. BETHAY: Yes, sir. Yes, sir.
19	MEMBER SHACK: Well, while you have the
20	picture here, where are the wells that you're taking
21	these water samples from located?
22	MR. BETHAY: There's one in this area.
23	There's one back here. As part of another effort
24	we're also installing three new wells back in this
25	area between the ocean and the building.

(202) 234-4433

	12
1	Dr. Wallis, I will get into the
2	MEMBER WALLIS: It is striking how close
3	the sea water is, though.
4	MR. BETHAY: Yes. Guys, help me with the
5	perspective here. From the edge of the building to
6	the water, this is the diesel generator building, so
7	it shields a good bit of property back here.
8	MEMBER WALLIS: Is there a drop from there
9	to the water that we don't see?
10	MR. BETHAY: Yes. Nominal ground level is
11	23 feet between sea level.
12	MEMBER WALLIS: Ah.
13	MR. BETHAY: So ground level is about 23
14	feet above the mean tide level.
15	MEMBER WALLIS: Mean?
16	MR. BETHAY: It's probably 30 or 40 feet
17	from the reactor building to the ocean. Maybe more,
18	I'm estimating.
19	MEMBER WALLIS: All right.
20	MR. BETHAY: It's a good distance.
21	MR. FORD: This is Bryan Ford.
22	We also just completed a hydrology study
23	of the site. And it shows that the water flow is from
24	the land out towards the sea, not from the sea in
25	towards the land.
	1

```
(202) 234-4433
```

	13
1	MEMBER WALLIS: Sort of has to be, doesn't
2	it?
3	MR. BETHAY: Okay. That's good news.
4	Moving on the agenda that I'd like to
5	cover this morning, is I'll talk very briefly about
6	the plant description and the current plant status.
7	I'll briefly hit some significant licensing highlights
8	for the plant. Our license renewal project, a brief
9	overview of that.
10	I think it's noteworthy to spend just a
11	minute on some of the cost beneficial SAMAs that we
12	identify here. I think that's a very unique and
13	interesting part of the whole license renewal process.
14	And then we'll spend the bulk of our time
15	discussing the four open items that were identified in
16	the report.
17	Pilgrim is located in Plymouth,
18	Massachusetts, right on the shores as you saw, of Cape
19	Cod Bay. We're about 40 miles south of the city of
20	Boston sited on 1600 acres of predominately woodland
21	that is managed as a forested area.
22	We are a BWR3 with a MARK 1 primary
23	containment structure. It's a General Electric NSSS
24	design and Bechtel was the original
25	architect/engineering constructor.

(202) 234-4433

	14
1	Our current license power level is 2028
2	megawatts thermal and we generate approximately 690
3	megawatts electric.
4	As you notice from the site overview, we
5	are an open cycle once through condenser cooling
6	plant.
7	The plant is owned and operated by the
8	Entergy Corporation, with headquarters in Jackson,
9	Mississippi.
10	And we currently have a staff of around
11	655 employees, including our security force.
12	Current plant status as of this morning,
13	the plant is operating at approximately 80 percent. We
14	are in an end-of-cycle coastdown that began in early
15	February. Our 16th refueling outage begins this
16	Friday, April 6th at midnight.
17	Currently all of our NRC performance
18	indicators and inspection findings are green and we're
19	in column 1 of the regulatory oversight matrix.
20	Just a few highlights of the licensing
21	history of the plant. Our construction permit was
22	issued in August of 1968. Following four years of
23	construction the operating license was issued in June
24	of 1972 with a full power license in September of that
25	year, and commercial operation in December of 1972.

(202) 234-4433

1 The plant was owned and operated by the 2 Boston Edison Company from that until 1999 when in 3 July of 1999 Entergy bought Pilgrim in the first sale 4 of a nuclear power plant in the United States. And we 5 transferred the license and assumed ownership and possession in July of 1999. 6 7 We did the small Appendix K, a feedwater flow measurement uncertainty power uprate in 2003. 8 9 We're currently not actively pursuing any additional power uprates for Pilgrim at this time. 10 Our license renewal application 11 was submitted in January of last year in anticipation of 12 the current license expiration in June of 2012. 13 14 Just some of the significant modifications 15 and licensing actions that have occurred at Pilgrim 16 over the years. I'd like to teach on these, primarily because looking back Pilgrim was the first or among 17 first plants to institute many of these 18 the 19 modifications and improvements to the plant that in 20 today's life serve us well in anticipation of a period 21 of extended operation. 22 In 1977 we replaced the core spray piping instead the primary containment with intergranular 23 24 stress corrosion cracking resistant material. 25 In the late '70s and early '80s, as all

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

	16
1	BWRs with the Mark 1 containment did, we undertook the
2	Mark 1 containment modification program, which was a
3	series of structural enhancements to the primary
4	containment structure to address concerns with cool
5	swell and chugging and condensation loads in the torus
6	following an accident.
7	In 1984 we replaced the recirculation
8	system piping with intergranular stress corrosion
9	cracking resistent material.
10	In 1986 to 1989 it's noteworthy that
11	Pilgrim was among the first plants to implement some
12	pretty significant safety enhancements that became the
13	standards for the BWR industry. We implemented a salt
14	service water to residual heat removal cross type that
15	would allow us to actually pump the ocean into the
16	reactor if that was necessary in a severe accident.
17	We also implemented the direct torus vent
18	that allows us to have a harden vent path through the
19	primary containment for pressure control in an extreme
20	event.
21	And we also were among the first plants to
22	address the station blackout rule. We installed an
23	independent diesel generator that can provide full
24	power to one of our emergency buses in a complete loss
25	of AC power event.
	1

(202) 234-4433

	17
1	In 1991 we instituted hydrogen water
2	chemistry, again to address intergranular stress
3	corrosion cracking concerns.
4	In 1995
5	MEMBER SHACK: Just out of curiosity
6	MR. BETHAY: Yes, sir.
7	MEMBER SHACK: What is your fraction of
8	time on the hydrogen water chemistry that your
9	MR. BETHAY: We currently run about 95
10	percent availability. As I was going to mention in a
11	moment, this outage we're injecting the noble metal
12	chemistry addition, which will require us to increase
13	that to a 98 percent availability. So we've got a
14	number of system enhancements, procedural enhancements
15	underway to raise that availability from the 95
16	percent to the 98 percent, which is a great lead in.
17	What's not on the slide, as I mentioned, our 16th
18	refueling outage starts this Friday, this weekend. And
19	we're taking advantage of this outage. We consider it
20	our license renewal outage. We'll be doing a number
21	of modifications that will position the plant well for
22	an additional 20 years of operations.
23	Some of examples. The noble metal chemical
24	addition, which will allow us to reduce hydrogen usage
25	but increase the availability.
l	I contraction of the second

(202) 234-4433

	18
1	We're replacing a reactor feedback motor.
2	We're replacing a condensate pump and
3	motor. We're replacing one of the reactor
4	recirculation system pumps and motors. And we'll be
5	doing a preemptive repair of our core shroud tie rods.
6	So a significant outage for us in terms of
7	positioning the plant for continued operation.
8	Just to briefly run through how we got to
9	today.
10	Our license renewal application was
11	prepared by a very experienced team of both corporate
12	and on site multi-disciplined folks. And most of that
13	team is present today should we have questions for
14	them.
15	Noteworthy that the Pilgrim and Vermont
16	Yankee applications were the first that were submitted
17	following issuance of Revision 1 of the Standard
18	Review Plan and the GALL. A lot of the work went into
19	the application in late 2005 to ensure that we were as
20	compliant as possible with Revision 1 of those
21	documents.
22	We have incorporated lessons learned from
23	our own in-house license renewal activities as well as
24	the lessons learned from others.
25	Our application underwent a peer review

(202) 234-4433

19
conducted by ten utilities. We received many comments
from our peers that were incorporated into the
application.
Once the application was completed, it
underwent rigorous reviews by our own site safety
review committee, our off site safety review committee
and our Quality Assurance Department in addition to
the technical reviews.
MEMBER WALLIS: You mentioned Vermont
Yankee. Pilgrim is very much like Vermont Yankee?
MR. BETHAY: Very similar. Yes, sir. Very
similar.
MEMBER ARMIJO: Lower core power density,
though, right? You're at three and they're at four?
MR. BETHAY: I believe that's correct.
Yes, sir.
In our application, obviously, a number of
commitments were identified. We've refined those
commitments over the last year or so. We've developed
a number of aging management programs as a result of
the inspections and audits and our own evaluations.
All of those commitments are being tracked in our
tracking process. And at the end of the day we're
looking at 40 aging management programs to support
operation in the period of extended operation.

(202) 234-4433

Fourteen of those programs currently exist and will continue forward without significant changes. Sixteen programs currently exist but will require enhancement for an additional 20 years of operation. And there are ten new programs that were identified during the evaluations.

7 Next I'd like to move on, not necessarily as directly part of the Safety Evaluation Report, but 8 in the environmental report side of the licensure 9 world, we spend a significant amount of time and 10 energy evaluating severe accident and mitigation 11 That review led us to conclude that 12 alternatives. there were seven potentially cross beneficial SAMAs 13 14 that we should consider implementing.

As you look down that list, you'll see 15 most of these are procedure changes. And it seemed to 16 17 us that if could improve safety, if we could reduce damage frequency larqe early release 18 core and 19 fraction, then why not? So these seven SAMAs, none of 20 them are age related, they're not directly related to 21 an aging management issue at the plant, however I 22 think it's important to point out to you that when 23 we've identified something that can enhance safety, 24 can enhance the core damage frequency, that we should 25 seriously consider that.

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1

2

3

4

5

6

	21
1	MEMBER WALLIS: This portable power
2	source, is that mounted on a truck or something or is
3	it
4	MR. BETHAY: It would be a skid. A skid
5	mounting.
6	MEMBER WALLIS: On a skin? So someone has
7	to hitch something up and slide it around?
8	MR. BETHAY: Right. Actually, these SAMAs
9	work very well with a number of the post-9/11 security
10	changes that are going on. Obviously, I can't get into
11	the details of that. But these SAMAs marry very well
12	with the need for firefighting and so forth and
13	restoring power to things that may haver been
14	significantly damaged in some event. So they work very
15	well hand-in-hand. and I think we were somewhat
16	fortunate that both evolutions were going on at the
17	same time.
18	MR. BARTON: Can you explain what the use
19	of diesel fire pump fuel transfer pump is all about?
20	MR. BETHAY: Fred or
21	MR. MOGOLESKO: Yes, I'll try.
22	That SAMA 57 I'm Fred Mogolesko. I
23	should have said that first.
24	Basically we're trying to eliminate
25	failures of the direct torus vent valves. There are
l	1

(202) 234-4433

	22
1	two of them. Due to the failure of a DC power
2	supplies. And by eliminating that, we enhance the
3	core damage frequency by eliminating at
4	MR. BETHAY: I think you're in the wrong
5	one, Fred.
6	MR. BARTON: Use of diesel fire pump
7	transfer pump.
8	MR. FORD: This is Bryan Ford.
9	What that is is it's an allowing another
10	pump that we have to pump fuel oil. We use this pump
11	for our firefighting, our fire pumps. It's allowing
12	that pump to supply fuel oil to our diesel generators.
13	MR. BARTON:
14	MR. FORD: For certain failures in the
15	diesel generator fuel system.
16	MEMBER WALLIS: So what I understand is
17	when you fight fire with water and you're going to
18	pump diesel oil through
19	MR. FORD: No. We have a diesel driven
20	fire pump. And we will be
21	MEMBER WALLIS: Oh, it's diesel driven?
22	MR. FORD: Yes. We will be using the
23	systems for supplying that fire pump. It's basically
24	doing some procedure changes so that we can use it to
25	feed fuel oil to the emergency diesel generators and
	I contract of the second se

(202) 234-4433

	23
1	supply electrical power to the plant.
2	MEMBER WALLIS: Oh, it's a different pump
3	but the same drive, is that it, or something?
4	MR. FORD: No. It's just a different pump
5	to supply fuel oil to the emergency diesel generators.
б	MR. SULLIVAN: It's a hydro pump driven
7	off the water discharge of the fire pump, which runs
8	the fuel pump.
9	MEMBER WALLIS: So it's a fuel transfer
10	pump that supplies fuel oil to the diesel fire pump?
11	MR. FORD: Yes, that's correct.
12	MR. BETHAY: Using it to supply oil to the
13	emergency diesel generators.
14	MEMBER WALLIS: Not water.
15	MR. BETHAY: So all of these SAMAs have
16	been included in our engineering request review
17	process for detailed evaluation and possible
18	implementation.
19	CHAIRMAN MAYNARD: And on the first two,
20	the wiring was already set up to do it? You only had
21	to change procedures to be able to cross tie the buses
22	there?
23	MR. BETHAY: That's correct.
24	Okay. As I said, we would get to that
25	front part fairly quickly. And we'll get to the meat

(202) 234-4433

	24
1	of the matter here to discuss the SER open items.
2	In the SER four open items were
3	identified. The first dealt with our security diesel
4	generator. The second with fire barrier penetration
5	seals. The third with our containment inservice
6	inspection program. And the fourth with the reactor
7	vessel neutron fluence calculations.
8	Now this is the part where if I get into
9	too much detail or too many pictures, please just stop
10	and say I've heard enough, and I'll move on.
11	The first issue dealt with the security
12	diesel generator. And this was a Region I confirmatory
13	item where the NRR Staff asked the Regional Inspectors
14	go out and confirm basically what we had said in our
15	application. Part of the initial request for that was
16	that we didn't include drawings because of the
17	security nature of this. So it required a little more
18	leg work on the part of the Region to go out and
19	verify that that what was in scope was correctly
20	included and that there were no spatial interactions
21	that we had failed to address and so forth.
22	It's our understanding that that regional
23	inspection has been completed and that issues were
24	identified. And that with the requested support, it's
25	been provided and pending NRR review that that issue
	I contract of the second se

(202) 234-4433

	25
1	has been addressed.
2	MEMBER BONACA: So the security diesel
3	components are
4	MR. BETHAY: Are all within scope.
5	MEMBER BONACA: Within scope?
6	MR. BETHAY: Yes, sir.
7	MEMBER BONACA: Good.
8	CHAIRMAN MAYNARD: Now the Staff's going
9	to have an opportunity to discuss their view on the
10	open items. If something is said here that you
11	disagree with, you can speak up, too.
12	MR. BUCKBERG: Thank you.
13	CHAIRMAN MAYNARD: Okay.
14	MR. BETHAY: The second open item dealt
15	with fire barrier penetration seals
16	MEMBER BONACA: Let me just get back to
17	the issue. I understand it is a security related
18	issue, but is the guidance now adequate for the
19	licensees that go to license renewal?
20	MR. BETHAY: Yes, sir. It's adequate in
21	terms of what mechanical components should be
22	included, what electrical components should be
23	included. I think the fundamental issue, and the Staff
24	may need to comment on this well, was because we
25	didn't provide the drawings for an off site review,

(202) 234-4433

	26
1	that required some extra leg work on site by an
2	inspection.
3	MEMBER BONACA: My question wasn't
4	relating to your closure. It was relating to the items
5	I mean it's not necessarily in GALL on what
6	components should be, and so that's what I was trying
7	to understand.
8	MR. BETHAY: Alan, is there anything to
9	add to the
10	MR. COX: Yes. This is Alan Cox with the
11	license renewal team.
12	The guidance was fine as far as what
13	should be included in scope. We had included the right
14	components in scope.
15	MEMBER BONACA: I know. I understand.
16	MR. COX: The reason was just that
17	review of actual drawings int he configuration to make
18	sure that we had identified those correctly.
19	MR. BETHAY: Okay. The second open item
20	that was identified expressed a concern on aging
21	management of inaccessible fire barrier penetration
22	seals. And the short answer to this is that all of
23	our seals are included in the program. All of our
24	seals are accessible and are included
25	MEMBER WALLIS: So there are no
	I contract of the second se

(202) 234-4433

	27
1	inaccessible seals?
2	MR. BETHAY: That's correct, sir.
3	MEMBER WALLIS: Oh, okay.
4	MR. BETHAY: There are no inaccessible
5	seals.
6	MEMBER WALLIS: Well, I was wondering when
7	you put this up how you inspected inaccessible seals.
8	MR. BETHAY: That's a very fair question.
9	And, you know, the fact is that we don't have any
10	inaccessible fire barrier penetration seals. So a
11	little communication problem that has been resolved.
12	And, again, we believe that that's pending Staff
13	concurrence. We believe that issue is resolved as
14	well.
15	Okay. With that, I'd like to take the
16	opportunity to shuffle a couple of folks here at the
17	table and bring up some of our containment people to
18	support me in the next portion of this presentation,
19	if that's okay.
20	CHAIRMAN MAYNARD: Sure.
21	MR. BETHAY: Okay. With that I'd like to
22	ask Gary Dyckman, Barry Gordon and Franz Ulm to please
23	join us.
24	As they're coming up, I'll introduce them.
25	Gary Dyckman is our Senior Design Engineer in

(202) 234-4433

	28
1	Mechanical Civil Branch. He's been a design engineer
2	in the civil structural world for a long time.
3	Next to him is Professor Franz Ulm. He's
4	a Professor at the Massachusetts Institute of
5	Technology in the Civil Engineering Department, who we
6	brought in as a consultant to advise us on one aspect
7	of this portion.
8	And at the end is Barry Gordon from
9	Structural Integrity Associates, again, to help us
10	answer questions when we get to the item dealing with
11	the water on the torus room floor later in this part
12	of the presentation.
13	So, thank you guys for joining me.
14	The third open item was stated as there is
15	potential for corrosion in the inaccessible area of
16	the steel containment shell, the base mat and the sand
17	pocket region. And it also delineated three inspection
18	observations that I'll address in this presentation.
19	1: The status of the rupture drain flow
20	switch.
21	2: Documentation of surveillance
22	documentation.
23	3: And the third item on which I'll spend
24	the most time is questions that were raised regarding
25	water on the torus room floor.
	1

(202) 234-4433

	29
1	MEMBER WALLIS: Well in this inaccessible
2	area, how do you know what's there? How do you know
3	if it's wet?
4	MR. BETHAY: In the inaccessible area?
5	Hopefully, I will explain that to you over the next
6	few slides. I've got
7	MEMBER WALLIS: You can look at where the
8	water gets in, but how do you know if it's already
9	there? You're going to explain that?
10	MR. BETHAY: I believe so. That's my
11	objective is to answer that very question over the
12	next five or six slides.
13	First of all, I'd like to start off by
14	saying that the saying that the design for Pilgrim is
15	a little different from maybe some others that you've
16	seen. And I will go through that design.
17	The design minimizes the potential for
18	undetected water intrusion into the air gap. We have
19	a number of diverse methods of prevention and
20	identification of potential water leakage.
21	MEMBER WALLIS: Well, minimizes, you mean
22	it reduces? Minimize is a technical term meaning that
23	you make as small as possible with constraints and
24	as
25	MR. BETHAY: Meaning that we've made
	1

(202) 234-4433

	30
1	that
2	MEMBER WALLIS: It is lesser than it as
3	some other plants?
4	MR. BETHAY: We've made it lesser and we
5	believe that we have extremely high probability of
6	detecting any leakage before it were to become a
7	concern. And, hopefully, I can show you through the
8	design how we've come to that conclusion.
9	We have a number of diverse methods of
10	preventing water and for identifying water should
11	there be any. We've had no indication of refueling
12	bellows leakage. Inspection have shown no water
13	intrusion in the air gap, and I will explain that to
14	you. We've seen no indication of drywell corrosion or
15	degradation. And we have performed confirmatory
16	ultrasonic inspections in the past and we will
17	continue those in the future.
18	MEMBER WALLIS: Do you have some material
19	in the dry well air gap? Some other plants have some
20	material. in the gap.
21	MR. BETHAY: We don't have the foam sheets
22	that some plants have had that.
23	MEMBER WALLIS: You don't have that? You
24	don't have that?
25	MR. BETHAY: Correct. There were foam
l	I contract of the second se

(202) 234-4433

	31
1	sheets installed, and I'll show you some photographs.
2	There were some sheets installed, but that were
3	removed during the construction process.
4	MEMBER ARMIJO: Just a quick question.
5	MR. BETHAY: Yes, sir.
6	MEMBER ARMIJO: Your comment on no water
7	intrusion into the gap, does that comment apply to the
8	entire history of the operation of the plant?
9	MR. BETHAY: Yes, sir.
10	MEMBER ARMIJO: So you have enough, let's
11	say, documentation or records that would give you
12	assurance that that's a sound statement?
13	MR. BETHAY: Yes, sir. Yes, sir. I
14	believe so. And I think when I talk about some of the
15	design features, kind of to state it simplistically,
16	we'll know for sure Monday morning when we reflood the
17	cavity, that if it's not leaking then it hasn't leaked
18	before. So I'll explain that in a moment.
19	This picture is a little hard to see.
20	Hopefully it's clear in your handout.
21	This is a diagram of the primary
22	containment structure. A typical Mark 1 containment
23	with the drywell and torus with the concrete liner on
24	the outside. This is the torus room, which will be the
25	subject of the next part of the discussion.
l	

(202) 234-4433

	32
1	What I'll be going through in detail is
2	this drain and the alarm, this set of drains and
3	inspections, this above sand pocket drain, it's item
4	number 3, and a below sand pocket drain. So just to
5	kind of put it in perspective of the areas elevation
6	wise that I'll go through in the next several slides.
7	MEMBER ARMIJO: Just quickly, that upper
8	sand cushion drain, how many are there?
9	MR. BETHAY: There are four, and I'll
10	discuss that in just a moment.
11	And just to jump ahead a little bit, I
12	personally went and look at all of this Monday
13	afternoon.
14	MEMBER WALLIS: A four-inch drain, you
15	must have expected a lot of water.
16	MR. BETHAY: It does seem like a big pipe,
17	doesn't it?
18	The first one I'd like to talk about is
19	the very first design feature that exists at Pilgrim
20	to prevent water from entering the air gap. And I'll
21	start at the refueling cavity liner plate.
22	The refueling cavity liner plate is
23	attached to the concrete. This area would be flooded
24	during refueling operations.
25	The most noteworthy feature is the bellows

(202) 234-4433

	33
1	plate itself. This is the refueling bellows. This
2	plate is welded to the liner. It's not a mechanical
3	joint that some plants have. So this welded seal
4	between the liner plates and their support structures
5	is the first barrier to water getting into the air
6	gap.
7	MEMBER WALLIS: That's a stainless steel
8	bellows, is it, or what is it?
9	MR. BETHAY: I believe it is stainless
10	steel. I don't know the grade of metal.
11	But if water should somehow get through
12	this welded connection or through the liner plate, the
13	first line of defense is a four-inch by two-inch call
14	it a gutter, trough that runs all the way around the
15	containment structure. At the bottom of that four-
16	inch trough
17	MEMBER BONACA: Before you go any
18	further
19	MR. BETHAY: Yes, sir.
20	MEMBER BONACA: Have you experienced any
21	reactor cavity liner cracks?
22	MR. BETHAY: No, sir. But even if there
23	were, the water would come down this way into this
24	area below the bellows, into the four-inch by two-inch
25	trough or gutter that fully sounds the primary
	I

(202) 234-4433

	34
1	containment and be collected in one three-inch line
2	passed by a flow switch, which is annunciated in the
3	the main control room.
4	The set point on this flow switch is
5	fairly high. So it is intended to detect gross
6	leakage that might be coming off of that line.
7	Obviously, leakage below the set point would be
8	collected and just drained off.
9	There was an issue raised in the
10	inspection report about this switch. It was
11	identified in late 2005 as failing surveillance. It
12	was replaced following that surveillance and
13	recelebrated. It's been recently recelebrated. It is
14	functional in anticipation of the refueling outage, as
15	I mentioned, that belongs this weekend where if we do
16	have a significant failure here, then we know that
17	this flow switch and control room alarm are
18	functional.
19	MEMBER SHACK: But that's the only
20	monitoring then of that drain is through the flow
21	switch?
22	MR. BETHAY: That's the only monitoring of
23	this drain. As I'll get to, there are other drains
24	that are monitored.
25	MR. BARTON: How do we know that drain is

(202) 234-4433

	35
1	not plugged?
2	MR. BETHAY: We do a surveillance on it
3	every operating cycle to verify that there's flow and
4	that the flow switch is functional. And that's what
5	was identified in late 2005 that the flow switch
6	failed a surveillance.
7	MEMBER WALLIS: Is this one pipe or
8	several pipes?
9	MR. BETHAY: This is one.
10	MEMBER WALLIS: Just one?
11	MR. BETHAY: This is one three-inch pipe
12	off of the four-inch by two-inch trough that runs
13	around.
14	MEMBER ARMIJO: What's the set point of
15	the switch?
16	MR. BETHAY: I believe six gallons per
17	minute. So it's looking for gross failure of the
18	bellows.
19	MEMBER ARMIJO: And there is just one
20	drain at that location with a flow switch?
21	MR. BETHAY: That's correct.
22	MEMBER ARMIJO: There's nothing else
23	around the circumference.
24	MR. BETHAY: Not on this trough.
25	MEMBER ARMIJO: Correct. Okay. Got it.
	I contraction of the second

(202) 234-4433
36 1 MR. BETHAY: Okay. The next level of 2 defense if we presume that --And when we're flooded up if 3 MR. SMITH: 4 there was any type of a leakage by there, you would 5 see air bubbles up on the refueling floor if there was leakage through there, too. So that's another place to 6 7 check. MR. BETHAY: But even if we presume that 8 there's been some failure that has allowed either 9 behind the liner plates or through the bellows itself 10 or through this welded joint or this welded joint such 11 12 that water was collecting in this area and this line were either plugged or nonfunctional for whatever 13 14 reason, the next line of defense is provided by a 15 drain collection system in four locations around the 16 periphery of the containment where two-inch reactor 17 cavity drain -- this would not only be full of water in refueling. To drain this cavity there are four 18 19 two-inch drain lines located around the primary 20 containment. Each of those drain lines is encased in 21 an eight-inch sleeve. At the bottom of that sleeve of 22 each of the four is a three-quarter inch drain line that drains to a floor drain on the 72 foot elevation 23

24 of the reactor building.

25

They're visible. Three of them drain to

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

5 It's also noteworthy our design provides 6 for a four inch berm at the edge of the concrete from 7 before the air gap. This is the air gap between the 8 concrete and the line and the containment. So the 9 volume is a four-inch high all the way around the 10 primary containment that would be capable of holding 11 whatever leakage came from this area.

12 IF it didn't go out this train, we would detect coming out these three quarter inch telltale 13 14 drains. Those are part of operator rounds. They're 15 surveilled once a shift. This was a question on documentation during the inspection on how well was 16 that documentation or how well was that surveillance 17 captured in the documentation when we looked to see 18 19 that there's no water coming out of those pipes. As 20 a result of that feedback, we have enhanced that 21 procedure to make that more clear and a more 22 definitive statement than kind of a statement of the 23 negative that was in the procedure.

24 MEMBER WALLIS: Well, I guess that this 25 works fine if the leak is of a drip. But if it's a

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1

2

3

4

	38
1	jet, if you have a sort of hole with a spray coming
2	out of there or a jet, it could conceivably in the
3	worst possible situation aim for the air gap. I mean
4	this is an extreme case. Your vision of a leak is
5	just sort of a rain falling down rather than a jet?
6	MR. BETHAY: Well, I think the design that
7	if it were a raining falling down, I don't know
8	MEMBER WALLIS: The rain would be all
9	right. IT would fall into that area. But a jet could
10	go anywhere.
11	MR. BETHAY: Right. I don't know the
12	dimension. If someone maybe could check that. Yes,
13	this is several inches wide. And it's got to
14	accommodate an eight-inch sleeve, it's got to
15	accommodate a four-inch
16	MEMBER WALLIS: You would be a very
17	unusual kind of a leak.
18	MR. BETHAY: Right. But even presuming
19	that, and I think the next line of design defense
20	would help that.
21	So let's assume the water does overcome
22	this drain somehow, water does overcome these four
23	three quarter inch drains such that this entire volume
24	all the way around the cavity fills up and spills over
25	into the air gap, which is this space. Water then,

(202) 234-4433

1 you could hypothesize would run down the air gap to 2 this is the 9 foot 2 elevation, the bottom, the floor 3 of the primary containment structure. And it would be 4 collected by four four-inch drain lines that sit just 5 above an 18 gauge sheet metal plate and drain above the sand pocket region into collection containers that 6 7 are on the torus room floor. 8 And as I started to mention a moment ago, 9 Monday, this past Monday I personally went and verified that all of those catch containments are 10 clean and dry and there's been no evidence of water 11 leakage in there. 12 MEMBER SHACK: How is that four-inch berm 13 14 plate sealed up at the top? 15 MR. BETHAY: It's welded. 16 MEMBER SHACK: It's welded? 17 MR. BETHAY: Yes. 18 And just as another point of interest, 19 just back in the '80s when the concern was raised 20 about corrosion of the primary containment structure, 21 Pilgrim went into these four-inch drain lines and 22 drilled holes in the elbows and did visual inspection 23 to verify, first, that those lines were clear and 24 unobstructed, and second to do a kind of brief visual 25 inspection of the liner that they could see at the end

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

(202) 234-4433

39

	40
1	of that. And the results of those inspections showed
2	that the containment structure was in its original as
3	constructed condition with no indication of corrosion
4	or degradation of the liner.
5	MEMBER ARMIJO: Were any photographs taken
6	of those particular
7	MR. BETHAY: Unfortunately,, no, sir. We
8	had hoped that there was a video or some photography,
9	but we couldn't find any record of that photography.
10	Just written word.
11	MR. SULLIVAN: We do have a record of the
12	inspection results that document putting a fluoroscope
13	up with no evidence of any debris, of any water or any
14	further material for rust.
15	MEMBER ARMIJO: There wasn't massive
16	amounts of rust or anything like that?
17	MR. SULLIVAN: No, sir. No, sir. No, sir.
18	MR. BETHAY: But if this drain didn't work
19	for whatever reason and water made it into the sand
20	pocket region, there are four bottom of sand pocket
21	drains that would provide the final barrier of
22	defense.
23	MEMBER WALLIS: Now in the previous on
24	page 16 these are shown are inclined drains?
25	MR. BETHAY: Yes, sir.
	I

(202) 234-4433

	41
1	MEMBER WALLIS: And are they inclined or
2	are they horizontal?
3	MR. BETHAY: They're inclined like this.
4	I don't know the exact degree.
5	MEMBER WALLIS: The other one, the one
б	above was horizontal, wasn't it?
7	MR. SULLIVAN: Right.
8	MR. BETHAY: Yes, there's a slight slope
9	to both of them and if you physically go and look and
10	it, you can physically can see that there's a
11	MEMBER WALLIS: So the sketch on page 16
12	is a little misleading about the angle of the
13	MR. SULLIVAN: The sketch isn't to scale.
14	I have actual construction drawings that I we can show
15	you at a break or put into the record.
16	MR. BETHAY: We've brought most of the
17	engineering details of this presentation if you need
18	that. These tried to just put it in perspective for
19	you.
20	So in the past as a result of industry
21	concerns about potential degradation of the
22	containment shell, we have performed some limited
23	ultrasonic inspections. We have UT'ed 12 locations at
24	the 9 foot 2 elevation, which is the floor of the
25	inside of the primary containment.

(202) 234-4433

	42
1	We have chipped the concrete out an inch
2	down into the sand bed region at four location,
3	performed ultrasonic inspection in those locations, as
4	well as six locations in the cylindrical upper portion
5	of the containment structure. All of those showed
6	nominal wall thickness and no indication of corrosion
7	or degradation of the steel.
8	MEMBER ARMIJO: When were those UT
9	inspections done?
10	MR. BETHAY: Brian?
11	MR. SULLIVAN: The UT inspections were
12	informed in 1987.
13	MEMBER ARMIJO: All of them at 1987, the
14	9"2', 9"1" and the upper locations; all of them were
15	done in 1987?
16	MR. SULLIVAN: No. Let me run through the
17	date line. In 1987 we inspected the 9"2" elevation.
18	In 1999 we inspected four location at one inch
19	elevation. And in 1999 and again in 2001 we inspected
20	upper elevations of the drywell.
21	MEMBER ARMIJO: Okay. Good.
22	MR. BETHAY: Again, we verified that the
23	upper sand cushion drains were clear and unobstructed
24	and dry. And as I mentioned, as recently as Monday
25	afternoon I personally looked at them and they're
	1 I I I I I I I I I I I I I I I I I I I

(202) 234-4433

	43
1	clear and dry.
2	All of the inspections and UT evaluations
3	have identified no corrosion. But in the future we do
4	plan to do the 9"2' elevation locations again; once
5	prior to the period of extended operation. And we've
6	committed to do it again within the first ten years of
7	extended operation, along with the routine
8	surveillance of the drain lines that we do.
9	We've also committed to perform ultrasonic
10	testing at the four 9"1' elevations, once prior to the
11	period of operation and again within the first ten
12	years of extended operation. And then we'll continue
13	to do the upper elevations as part of the primary
14	containment out of the inspection program.
15	MEMBER ARMIJO: Now you still have the
16	sand in this sand cushion region?
17	MR. BETHAY: Yes, sir. Yes, we do.
18	MEMBER ARMIJO: So it's so still there?
19	MR. BETHAY: It's still there. That's
20	correct.
21	MEMBER BONACA: You said at the beginning
22	that the flow switch in the control room activates at
23	8 gpm. And a question I have for that system, I think
24	is a three-inch pipe, I guess it can going much
25	more than 6 gpm, right?
	1

(202) 234-4433

	44
1	MR. BETHAY: I'm not sure what the maximum
2	flow rate under just
3	MEMBER BONACA: Certainly you have
4	established what kind of leakage you would have to
5	have in order to then have to rely on the other drain?
6	MR. BETHAY: I think just without doing a
7	calculation in my head, I think you would have to have
8	a pretty substantial leak
9	MEMBER BONACA: Oh, a substantial leak?
10	MR. BETHAY: to not be handled by that.
11	MEMBER BONACA: Because there are four
12	drain pipes, right?
13	MR. BETHAY: There's only one of those.
14	MEMBER BONACA: Only one, and that's the
15	three-inch pipe?
16	MEMBER BONACA: Yes, sir.
17	CHAIRMAN MAYNARD: The gutter.
18	MR. BETHAY: That's correct. There's one
19	three-inch drain off a gutter.
20	MEMBER BONACA: One three-inch drain.
21	Okay.
22	CHAIRMAN MAYNARD: But you have four
23	others that if that overflows
24	MEMBER BONACA: Well, yes. I'm trying to
25	understand
l	1

	45
1	CHAIRMAN MAYNARD: It'll go into some
2	others.
3	MR. BETHAY: Yes, sir.
4	MEMBER BONACA: how much leakage you
5	need to have to rely on the other four.
6	MEMBER WALLIS: It's not the pipe that's
7	limiting. It's the gutter. I mean, if the leak is on
8	the other side, it has to run all around the gutter.
9	That's probably the limiting.
10	MR. BETHAY: Yes. So I don't know off the
11	top of my head that diameter of the gutter. So
12	perhaps one of your guys could do a quick calc to pick
13	up that volume, and then we can talk. We can come back
14	to that. I don't know that volume off the top of my
15	head.
16	MEMBER BONACA: Now just to understand
17	again the substantial leak.
18	MR. BETHAY: It would be a substantial
19	leak, yes sir.
20	MEMBER BONACA: Yes. Yes.
21	Okay. The next item that I'd like to move
22	to is an item that was identified or came to question
23	I shouldn't say identified. But it was a question
24	that was raised during the inspection. And it raised
25	as a question relative to the previous discussion on
	I

```
(202) 234-4433
```

1 the fact that there's water in some areas, some limited areas on the primary containment floor. 2 And 3 the question was raised are you sure that this water 4 isn't coming from the air gap drains. We are sure 5 that the water is not coming from the air gap drains. We are sure that the water is ground water that's 6 7 coming in. We're sure that that's posing no adverse 8 effect to embedded steel or to the structural 9 integrity of the building. And what I'd like to do for the next 10 several slides with the help of my team here is walk 11 through that. 12 Again, this is the part where I got a lot 13 14 of pictures and drawings. If it's too much, just stop 15 and we'll move on. We do have hyperlinks so we can 16 slip around. 17 The water, as I just said, we have identified the source of the water. Historically we 18 19 know that it's ground water. I can talk about that. 20 We are quite confident that the water has 21 no effect on the integrity of the concrete or embedded 22 steel or anchor bolts in the floor. We are confident in the overall structural 23 24 adequacy of the reactor building. 25 And we have committed to continue to

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

(202) 234-4433

46

	47
1	monitor that water, the concrete, and the bolts
2	pending any repairs that we need to make. And I'll
3	discuss that a little more.
4	CHAIRMAN MAYNARD: And you're going to go
5	ahead and defends your statements here, your
6	conclusions?
7	MR. BETHAY: Yes, sir.
8	Well, I may have to call on some of my
9	cohorts.
10	CHAIRMAN MAYNARD: I understand that. I
11	understand.
12	MR. BETHAY: As I mentioned, this became
13	a question in the regional inspection, but the
14	indications of water on the floor is not a new
15	phenomenon. There have been indications of water on
16	the torus room floor for a number of years. It's been
17	evaluated by engineering several times
18	MEMBER SHACK: Indications? I mean, is
19	there any indications that the flow is increasing, is
20	it constant, the same water the same areas have
21	been wet
22	MR. BETHAY: Yes, sir. Yes, sir. And I'll
23	show you pictures. I think I can nail that for you.
24	So it's been evaluated many times. Most
25	recently by Dr. Ulm from MIT, who we brought in this
	I

(202) 234-4433

	48
1	year to
2	MEMBER WALLIS: Well, this water on the
3	floor, does it saturate the air in that area?
4	MR. BETHAY: No, sir. The water on the
5	floor just and let me go ahead and click to I'm
6	going to show you the worst picture. This is the
7	worst picture of the 16 torus bays.
8	MR. BARTON: Is your radiation something
9	related to the water on the floor or to the activity
10	in the torus.
11	MR. BETHAY: It's related to the activity
12	on the torus.
13	The general dose rates in here are 5 to 10
14	per hour.
15	MR. BARTON: Okay.
16	MR. BETHAY: What you see is this water on
17	the floor, you know we believe is emanating from
18	around some of these base plates. This structure, and
19	I'll show you in some other pictures, is the Mark 1
20	containment modification phase II torus saddle that
21	was installed. There are 16 of these around the
22	plant, each held down by eight rock bolts. They were
23	installed to hold the torus down in the event of a
24	complete blowdown to prevent pool swell, chugging
25	loads from the torus lifting up.

(202) 234-4433

	49
1	What we've seen historically is water on
2	the floor around one or more of these base plates.
3	I'll show you some other pictures. Now
4	MEMBER WALLIS: Now the water comes in and
5	evaporates?
6	MR. BETHAY: It evaporates. When I was
7	down there Monday afternoon, this water is not of a
8	measurable depth. It's wet, so it's not like three or
9	four inches of water. You know, to use a home
10	analogy, it's kind of like what you'd see after a
11	heavy rain maybe in your basement where you get some
12	seepage, the floor gets wet, but it's never a pumpable
13	and mechanically removable depth.
14	MEMBER WALLIS: Presumably the front goes
15	back as the weather changes and the humidity changes
16	and so on.
17	MR. BETHAY: IT flows in and evaporates.
18	MEMBER ARMIJO: Is that white material is
19	salts from evaporation or something else?
20	MR. BETHAY: This? The perspective in
21	this picture is a little hard to tell. This is
22	painted out here. There is no indication this is
23	the outside of the torus. The pedestal is under here.
24	So we're standing on the outside of the circumference
25	looking under.
1	1

(202) 234-4433

	50
1	MEMBER WALLIS: Okay. What's the white
2	stuff then? It's not sea salt or something?
3	MR. BETHAY: It's not sea salt. There are
4	calcium deposits that and we'll show some other
5	pictures where you'll see
6	MEMBER WALLIS: It comes out of the
7	concrete?
8	MR. BETHAY:some deposits on the
9	concrete.
10	MEMBER WALLIS: Okay.
11	MR. BETHAY: But this the worst picture.
12	And if you'll let me go along, I'll get to some with
13	a little clear contrast.
14	MEMBER ARMIJO: I still want to know what
15	that white material is. Is that a deposit
16	MR. BETHAY: Yes, sir. This is
17	MEMBER ARMIJO: or something that's
18	leached out of the concrete or
19	MR. BETHAY: This is material that has
20	leached out of the concrete. And then I've got the
21	chemical composition. We'll talk about that in a
22	moment.
23	I just want to set this to kind of set the
24	stage to show that you of the 16 bay areas of the
25	torus, this is the worst one. So anything else that

(202) 234-4433

	51
1	I show you is less significant than what you see in
2	this picture in terms of what it looks like.
3	So what we've concluded is that the source
4	of the water is ground water. It seeps in under
5	hydraulic pressure. And I'll talk a little bit about
6	that as I show where the water table is relative to
7	the plant.
8	IT's a very low seepage rate and it's
9	counteracted by evaporation.
10	MEMBER WALLIS: This is because you have
11	ventilation in there, do you?
12	MR. BETHAY: I think it's partly there's
13	ventilation. It's a warm area and it's not that much
14	water. And it just comes in and evaporates.
15	MEMBER WALLIS: You're monitoring the
16	humidity in there, the relative humidity, the tendency
17	to condense in other words, are you monitoring it?
18	MR. BETHAY: It does condense. Even with
19	this issue aside, if you were to go into this plant or
20	I venture most plants on a humid day in the
21	summertime, you'll see condensation in the torus room.
22	The torus is cold.
23	MEMBER WALLIS: Right.
24	MR. BETHAY: Relatively. It's not uncommon
25	at all at this plant or any other to see condensation
l	

(202) 234-4433

	52
1	on the torus shell.
2	MEMBER BONACA: Is seepage occurring in
3	every bay?
4	MR. BETHAY: No, sir. And Ill show you. I
5	have a diagram that shows where it occurs and where it
6	doesn't historically.
7	MEMBER ARMIJO: So does that mean there is
8	some damage in some parts of the waterproof membrane?
9	MR. BETHAY: I'll get to that exact point
10	in just a second. The short answer is yes.
11	MEMBER ARMIJO: One last. Is there a
12	drain in that bay, bay 10? Is that one of the
13	locations where you have
14	MR. BETHAY: Where there's a drain?
15	MEMBER ARMIJO: Yes.
16	MR. BETHAY: No, sir.
17	MEMBER ARMIJO: Okay. There's no drain?
18	MR. BETHAY: There's no drain in bay 10.
19	MR. COX: Are you talking a drain
20	MEMBER ARMIJO: Drains on the air gap?
21	MR. BETHAY: Oh, no, no, no, no.
22	MR. COX: He's talking about the air gap.
23	MR. BETHAY: The air gap drain. I have to
24	look at the diagram. I don't remember the numbers.
25	MR. GORDON: The answer is no. The answer
	I

(202) 234-4433

	53
1	is no.
2	MR. BETHAY: Okay. Thank you, Barry.
3	MEMBER ARMIJO: Is the hydraulic pressure
4	high enough to allow water to seep through the entire
5	22 foot 8 inch thick concrete pedestal?
6	MR. BETHAY: Well, if I can get to that,
7	I think we can answer that question and then Dr. Ulm
8	has a very scientific answer for that. Just one more
9	second and I'll answer that very question.
10	I wanted to give you kind of the answer
11	conclusions and then we'll go back and build some
12	history and answer both of your questions.
13	We have determined that the water is not
14	aggressive. It's a benign chemistry to both the
15	concrete and any embedded steel.
16	We've seen no structure distress in the
17	structures. No cracking on the floor beyond hairline,
18	normal surface cracks that you might see in concrete.
19	No evidence of spalling. No evidence of building
20	settlement or differential settlements between the
21	buildings.
22	And also as it'll become evident in our
23	discussion later, that the grout around these anchor
24	bolts around which we see water, there's been
25	questions raised whether that grout serves any
	1

(202) 234-4433

	54
1	structural purpose. And it does not. It's there for
2	you know , just a bolt.
3	MEMBER SHACK: How does the anchor bolt an
4	anchor?
5	MR. BETHAY: How does it anchor?
6	MEMBER SHACK: Yes.
7	MR. BETHAY: It's a typical Williams lock
8	bolt anchor.
9	Yes, Gary, you want to describe how that
10	works?
11	MR. DYCKMAN: Yes. The Williams Rock Bolt
12	Anchor has a cone and shell. It's a mechanical
13	expansion anchor essentially. So it's drilled yes,
14	it's drilled, the holes are drilled 2 inch diameter
15	around 2 to $2\frac{1}{2}$ deep and the bolt is inserted in the
16	hole and then a torquing process or tensioning process
17	is used to draw the cone up within the shell.
18	MEMBER ARMIJO: Now that doesn't penetrate
19	your membrane, your waterproofing?
20	MR. DYCKMAN: That does not. No. The
21	concrete mat is eight foot thick and these tie down
22	bolts were in the range of 2 to $2\frac{1}{2}$ feet deep.
23	MEMBER SHACK: So it is expanding, again
24	which fraction of that hole? The lower six inches?
25	MR. DYCKMAN: The lower six inches, yes.
	I

(202) 234-4433

	55
1	The coning shell are approximately six inches in
2	height.
3	MR. BETHAY: Okay. The current status is
4	that the water has been reanalyzed recently. It's
5	been reanalyzed and it's been analyzed a number of
6	times over the years. But recently we
7	MEMBER WALLIS: Could you go back to the
8	picture with the white stuff? Now on the left hand
9	picture there there's a rust line or red line behind
10	the anchor bolts on the white. What is that?
11	MR. BETHAY: Yes, sir. That's surface
12	corrosion from this base plate. Because this floor was
13	not flat originally. You know, it has a concave
14	structure to collect water. These were an
15	afterthought in the late '70s, early '90s. This was
16	a grout pad that was poured to level the floor over
17	what was concave. And these structures were set on
18	top of that.
19	So you'll evidence in some areas, this
20	is it looks worse than it is person. This is fairly
21	minor surface corrosion
22	MEMBER WALLIS: That's corrosion of this
23	thing which was put it to support the torus?
24	MR. BETHAY: That's correct. Of this base
25	plate that runs all the way across.

(202) 234-4433

	56
1	MEMBER WALLIS: So that it's wide sitting
2	on the white part there.
3	MR. BETHAY: This is just a painted
4	MEMBER WALLIS: That's just paint?
5	MR. BETHAY: This is just paint. Yes, sir.
6	MEMBER WALLIS: Okay. So obviously
7	there's a separation there between the base plate and
8	something else?
9	MR. BETHAY: That's correct.
10	MEMBER WALLIS: Okay.
11	MR. BETHAY: Now what I'd like to do is
12	you have several questions about the base mat, you'd
13	asked how it was built. I'd like to run through these
14	because I think it's instructed to kind of see how we
15	ended up today and how we started out. And if this
16	gets too much, just stop me.
17	When the plant was originally built, the
18	site was excavated to a depth of about 50 feet. And
19	because the water table was around 24 feet below
20	normal grade level, a dewatering system was installed
21	to help in the construction of the site.
22	MEMBER WALLIS: And where is sea level
23	there?
24	MR. BETHAY: Sea level, this is nominal 23
25	foot elevation. So sea level is the

(202) 234-4433

	57
1	MEMBER WALLIS: Sea level is above the
2	water table.
3	MR. BETHAY: It would be on average,
4	they're about the same at this point. As your point
5	earlier, it's very close to the ocean. So there
6	MEMBER WALLIS: So the water table is
7	about the same as mean sea level?
8	MR. BETHAY: Approximately.
9	MEMBER WALLIS: So there much inducement
10	for flow to be towards the sea, is there?
11	MR. BETHAY: Well, we've done pretty
12	detailed hydrological studies that clearly show, while
13	it's not a rapid flow, the flow is clearly towards the
14	sea.
15	CHAIRMAN MAYNARD: And that close you
16	wouldn't expect a big difference of elevation.
17	MR. BETHAY: You wouldn't expect a huge
18	difference. That's correct.
19	So the dewatering system was installed in
20	order to facilitate the
21	MEMBER WALLIS: Now is this rock or is
22	this sand?
23	MR. BETHAY: Gary?
24	MR. DYCKMAN: At the bottom of the
25	excavation there's approximately 60 feet of a granular

```
(202) 234-4433
```

	58
1	material before you get to the top of bedrock.
2	MR. BETHAY: I believe it's been described
3	as granular glacial till.
4	MEMBER WALLIS: So this is part of the
5	huge glacier that made the Cap?
б	MR. DYCKMAN: Yes. Yes.
7	MEMBER WALLIS: So it is porous?
8	MR. DYCKMAN: Quite porous, yes.
9	MR. BETHAY: And there you can see in the
10	1968 time frame where the site had been excavated in
11	preparation for the placement of the base mat.
12	And then a three inch work slab was poured
13	just to provide a nice level surface on which to work
14	and the water system was still in place.
15	We have construction pictures showing that
16	the work slab being laid.
17	Then the waterproof membrane was laid down
18	on top of that. That was intended to provide the vapor
19	barrier below the base mat and up the sides.
20	MEMBER WALLIS: What's it made of?
21	MR. BETHAY: Gary, can you help be again?
22	MR. DYCKMAN: There were three different
23	materials that were specified, and I'm not sure which
24	one was used. But there was a neoprene, and a butile
25	rubber material. It was in the original

(202) 234-4433

59 1 specifications. 2 MEMBER WALLIS: So what supports it on the 3 side there? It doesn't seem to have any meaningful 4 support. 5 MR. BETHAY: This is just a cartoon. This 6 just shows --7 MEMBER WALLIS: It doesn't have any means 8 of support ont he side. 9 MR. BETHAY: No, this is just a cartoon. 10 MEMBER WALLIS: Okay. So there is some granular rocky material it's resting on or something 11 on the side? 12 MR. DYCKMAN: This is just a cartoon. 13 14 MR. BETHAY: It's just a cartoon. This isn't actual --15 16 MEMBER WALLIS: Presumably what's in that 17 white triangle is glacial till? MR. BETHAY: This is air. No, sir. this is 18 19 air. 20 MEMBER WALLIS: Air? It's just standing 21 there in air? It can't do that. 22 This line -- Gary, help me MR. BETHAY: 23 here. 24 MR. DYCKMAN: Well, again, it's a cartoon. 25 And once the concrete map, they had put the concrete

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

```
(202) 234-4433
```

	60
1	map and it's placed and the vertical walls begin to be
2	constructed, that material is brought up and bonded to
3	the side of the concrete and then backfilled against
4	the held in place with backfill.
5	MR. BETHAY: And I think that shows on the
б	next picture you'll be able to see it.
7	MEMBER WALLIS: It doesn't get damaged
8	where it's kinked from the edge of the slab there?
9	MR. DYCKMAN: WE suspect it probably did,
10	and that's why we have water intrusion.
11	MR. BETHAY: And you can see where they've
12	laid the portion of it. This is the membrane lying on
13	the work slab before they begin replacing the rebar to
14	fill the basin.
15	MEMBER WALLIS: They build a drain or
16	something there, too.
17	MR. BETHAY: Then they poured the 8 foot
18	thick base slab and the 14 foot pedestal in the
19	middle.
20	And this construction picture is important
21	because it shows us how the basement was actually
22	constructed.
23	This is the outer portion of the torus
24	room base mat, the reactor building base mat. You can
25	see that it was poured in four sections. Here are the
	1

(202) 234-4433

	61
1	construction joints. And there's another one over
2	here.
3	These four corner areas were poured first
4	and then the large octagonal center core was poured
5	the last. And that, we believe is a significant
6	design factor or construction factor that led to small
7	pathways for water intrusion.
8	MEMBER WALLIS: See, none of this do we
9	see the waterproof liner.
10	MR. BETHAY: Just in the previous
11	construction photo you could see it lying on the
12	floor.
13	MEMBER WALLIS: Okay. Where is it there?
14	MR. BETHAY: Slide 34.
15	MEMBER WALLIS: Is it a cartoon or is a
16	real thing.
17	MR. BETHAY: Slide 34.
18	CHAIRMAN MAYNARD: No, no. It's a real
19	picture.
20	MEMBER WALLIS: So that's a mat that
21	MR. BETHAY: That's the waterproof
22	membrane.
23	MEMBER WALLIS: That looks like a tarp
24	laid out on the ground?
25	MR. BETHAY: That's correct, yes.
	I Contraction of the second

```
(202) 234-4433
```

	62
1	MEMBER WALLIS: Now doesn't this concrete
2	settle?
3	MR. BETHAY: Yes, sir.
4	MEMBER WALLIS: This kind of foundation?
5	MR. BETHAY: Gary?
6	MR. DYCKMAN: No. The material, the
7	foundation matter is grainy material and it will
8	settle elastically in response to load. And at the
9	determination or completion of loading, it's basically
10	stable and there's no time dependent settlement that
11	I'm aware of.
12	MEMBER WALLIS: But it does settle when
13	you load it?
14	MR. DYCKMAN: Yes, it does and the
15	elasticity
16	MEMBER WALLIS: So there is some motion?
17	MR. DYCKMAN: Yes, sir.
18	MEMBER WALLIS: So you could tire the
19	liner, presumably? Then it gets through eight feet of
20	concrete even if it gets through the liner? The
21	water?
22	MR. BETHAY: Right.
23	Just as another point of reference, this
24	is a side view of the base mat rebar as it was being
25	installed. You can see point of reference. This is

(202) 234-4433

	63
1	a six foot stepladder that's inside the rebar mat.
2	This was then filled with concrete in the four
3	sections that I showed before.
4	Then, as Gary mentioned, the walls were
5	built ont he side and this membrane is folded up
6	rolled up the sides.
7	The primary containment structure
8	construction began. This is an interesting you
9	know about half way through the construction of the
10	primary containment and the torus you can see the
11	torus under construction here with the vent header
12	inside. This is the primary containment, a drywell.
13	This guy standing on the ladder, he's standing on the
14	sand pocket region that we talked about before.
15	This is the floor. This is good for
16	perspective on the size of the room. This is the
17	floor on which we see the water. And this is the
18	center mat that was poured as the pedestal for the
19	primary containment structure.
20	MEMBER WALLIS: IS that snow there?
21	MR. BETHAY: I think it's just glare.
22	MEMBER WALLIS: Just glare. Okay.
23	MR. BETHAY: Now this guy doesn't have a
24	coat on, so it's not I don't think it's snow.
25	And then the construction continued. They

(202) 234-4433

	64
1	continued to build the containment. You can tell here
2	that when we say bays, it's these segments of the
3	torus where it's welded together. That's what when we
4	talk about bay, that's what we're talking about.
5	The room itself is octagonal in shape,
6	essentially close to a circular room.
7	You can also it's interesting how they
8	haven't actually placed the concrete coming up around
9	the containment structure. It's an interesting note.
10	This is looking towards the ocean.
11	Containment continued to be placed. The
12	dewatering system was secured. And they began the
13	cylindrical construction on the primary containment
14	structure.
15	Finished completion of the reactor
16	building and the water table then returned to its
17	preconstruction level and the level that we believe it
18	is today based on our hydrological studies. This
19	level is at 23 feet main sea level. A nominal water
20	table is around minus one. It's pretty much the same
21	as sea level, very close on average. and then the
22	bottom of the reactor building is another 25 feet
23	below that.
24	So the bottom of the reactor building sits
25	under a fairly constant static head of about 25 feet

(202) 234-4433

	65
1	of water.
2	The water on the floor that we're talking
3	about is this floor. The bottom of the reactor
4	building floor.
5	MEMBER WALLIS: IS it on the land side or
6	the sea side?
7	MR. BETHAY: If you'll look at the next
8	drawing, sir, I'll show you. This is a plan view of
9	the torus room and the construction sequence. The
10	dotted lines represent the various construction
11	concrete placements, being the four corner placements
12	that were done that form the base mat, the eight foot
13	base mat. The center section, octagonal section that
14	forms the containment pedestal.
15	In this picture north is up and to the
16	ocean. So in this drawing the ocean is to the top or
17	in line with bay 10.
18	Each of the dots that you see in this
19	picture represent one of the bolts that's holding down
20	a torus saddle.
21	Where you see a red dot is indicative of
22	an area that is currently or has shown some evidence
23	in the past of having been wetted.
24	The green dots indicate bolts that we have
25	not seen evidence of being wetted.

(202) 234-4433

	66
1	So you see the predominately the bays of
2	concern as bay 10 and bay 6 are the most significant.
3	MEMBER ABDEL-KHALIK: So the red dots
4	coincide with the location of the bolts?
5	MR. BETHAY: Yes, sir.
6	MEMBER ARMIJO: So is it possible that
7	during tightening of these Williams Anchor Bolts that
8	you may have fractured the concrete at the bottom of
9	the bolt?
10	MR. BETHAY: We don't think that's the
11	case. And in just a minute I'll probably ask Dr. Ulm
12	to add some perspective on that. He's done some work
13	that I believe has a better answer than we fractured
14	the concrete. So let me just show you a couple of
15	pictures again for perspective.
16	If you go to bay 2, this is the southern
17	bay of the containment. And I think in your
18	presentation the bay numbers are the top of the
19	sheets.
20	Again, you're looking at this is the
21	we're looking from the outer radius of the torus
22	underneath the torus. You see one saddle structure on
23	this side and the saddle structure on this side.
24	MEMBER ARMIJO: Are those the bolts that
25	you're talking about?

(202) 234-4433

	67
1	MR. BETHAY: Yes, sir. These are the rock
2	bolt anchors that were drilled down into the concrete
3	approximately three feet. These 2 to 2½ inch diameter
4	bolts were then dropped into the holes. Tensioned
5	against this jacking plate, set into place. The holes
6	were then regrouted and this load bearing assembly was
7	constructed.
8	MEMBER ARMIJO: Okay.
9	MR. BETHAY: There are four of these on
10	each side of each saddle.
11	This one, obviously, is in pretty good
12	shape. You don't see any indication of stain. This
13	line here is a paint line where they painted the
14	floor. But these bolts look very good on the other
15	side as well, however it doesn't show up well.
16	MEMBER WALLIS: These things that support
17	the torus, are they reenforced concrete or are they
18	steel?
19	MR. BETHAY: They're not supporting the
20	torus, sir. They're actually holding it down.
21	MEMBER WALLIS: They've gone over the top
22	of it?
23	MR. BETHAY: No, sir. This is the torus.
24	MEMBER WALLIS: Yes.
25	MR. BETHAY: The huge doughnut These

(202) 234-4433

	68
1	support structures got to bay 9, Ed.
2	MEMBER WALLIS: They go around. How do
3	they hold it down?
4	MR. BETHAY: I'll show you. Let's go to
5	bay 9. This is a slide.
6	You see this is the torus.
7	MEMBER WALLIS: All right.
8	MR. BETHAY: This is the original torus
9	support. This is a pillar, there's one on each side.
10	In the phase one of the Mark 1 containment
11	modifications this support structure was modified to
12	provide not support capability but hold down
13	capability.
14	MEMBER WALLIS: How does it hold down?
15	MR. BETHAY: How does it hold down or why?
16	MEMBER WALLIS: It pulls on it. It must
17	pull on it. How does it pull on it?
18	MR. BETHAY: This is welded to the torus.
19	This is bolted to the floor. And from a hold down
20	perspective, originally
21	MEMBER WALLIS: It could hold it down or
22	up? I mean, it's just holding it.
23	MEMBER WALLIS: Right. Correct.
24	MEMBER WALLIS: It's not any tension.
25	MR. BETHAY: But this is the modification,
	1

(202) 234-4433

	69
1	this saddle
2	MEMBER WALLIS: Yes, but it doesn't hold
3	it down.
4	MR. BETHAY: it's welded to the torus.
5	And its purpose is not support, but restraint.
6	MEMBER WALLIS: So it's the welding in,
7	it's welded?
8	MR. BETHAY: Yes. Yes, sir. It's welded
9	here and it's bolted to the floor.
10	MEMBER WALLIS: Well, it could support it
11	up or down.
12	MR. BETHAY: I guess it actually does, but
13	it's designed
14	MEMBER WALLIS: It stops it bouncing?
15	MR. BETHAY: Exactly. Exactly. Okay.
16	Move back.
17	MEMBER ARMIJO: Before you leave, that's
18	a good spot.
19	Where are your drain lines from the supper
20	sand bed region? Where do they come out on the
21	MR. BETHAY: You've got the exact
22	location?
23	MR. DYCKMAN: Yes, we do. They're in bays
24	12 I'm sorry. Bay 11, bay 15
25	MEMBER ARMIJO: Eleven?11,
1	I contraction of the second

```
(202) 234-4433
```

	70
1	MR. DYCKMAN: Eleven, 15, bay 17 and bay
2	3.
3	MR. BETHAY: So they're here, here and
4	here.
5	MEMBER ARMIJO: I wish there wasn't one at
6	a 11.
7	MR. BETHAY: Go to bay 11, let's look at
8	that.
9	MEMBER ARMIJO: So that's close to your
10	MR. BETHAY: That's bay 11.
11	MEMBER ARMIJO: The argument I'm getting
12	at is how can you conclude the water doesn't come from
13	that drain collection area which is closer, you know
14	pretty near by the bay 10?
15	MR. BETHAY: That's true. This is pay 11.
16	The catch containment, again we're looking at the
17	outside of the torus. That catch container is behind
18	it's at the end of the structure.
19	MEMBER ARMIJO: Yes.
20	MR. BETHAY: And the pipe comes down from
21	above into a collection container. And we surveill
22	that collection container, and it's always dry. So if
23	this were water from there, it would be coming from
24	that pocket.
25	MR. BARTON: Well, the chemistry would be
	I contract of the second s

(202) 234-4433

	71
1	different, too, wouldn't it?
2	MR. BETHAY: And the chemistry would be
3	different, yes.
4	MEMBER ARMIJO: You know, I think it's
5	just it may be just coincidental, but if you look
6	at that picture you could argue that the water is
7	coming from that inside corner there and coming out
8	ont he floor and wetting
9	MR. BETHAY: I think that's what raised the
10	question to begin with.
11	MEMBER ARMIJO: Yes.
12	MR. BETHAY: And so we've gone in and
13	verified that those drains are not the source of the
14	water.
15	MEMBER ARMIJO: Okay. So you have an
16	independent way of proving that that water came from
17	the ground water?
18	MR. BETHAY: That's correct. By
19	chemistry, as was mentioned, and by visual inspection.
20	MR. COX: One other point.
21	This is Alan Cox.
22	If you go back to the slide that Steve
23	showed that showed the bays. You'll notice the
24	construction joints are also shown on there. And I
25	think it's interesting to note that the places where
1	

(202) 234-4433
	72
1	you had the most red dots are associated with those
2	joints between the plates.
3	MEMBER ARMIJO: Yes.
4	MEMBER WALLIS: But the water on the floor
5	is on the inside, isn't it? It's not on the outer
6	periphery.
7	CHAIRMAN MAYNARD: It's on the inside.
8	MR. BETHAY: Go to
9	MEMBER WALLIS: But it's on the inside.
10	My impression is the picture we see is the water is on
11	the inside of the
12	MR. BETHAY: This is bay 6 now. This is
13	not currently wet.
14	MEMBER WALLIS: No. But when you show
15	water on the floor in a wet bay, the water is on the
16	inside of the torus.
17	DR. ULM: If I can help, Steve.
18	MEMBER WALLIS: It's not on the outer
19	wall.
20	MR. BETHAY: Yes.
21	MEMBER WALLIS: It's on the inside.
22	MR. BETHAY: No, it's on the inside.
23	That's correct.
24	MEMBER WALLIS: So if it were seeping from
25	the outer wall near you would expect to see it on
I	I contract of the second se

```
(202) 234-4433
```

	73
1	the outside, wouldn't you?
2	MR. BETHAY: Yes. The floor is concave,
3	SO
4	MEMBER WALLIS: Why do you see it in the
5	middle? I mean it's got to get there somehow.
6	MR. BETHAY: Right. And we believe
7	MEMBER WALLIS: It comes up the bolts and
8	drains. Is that your theory, is that it comes up the
9	bolts.
10	MR. BETHAY: Yes, the theory is it comes
11	up the bolts.
12	Franz, maybe you could perspective here.
13	DR. ULM: I think first of all, the first
14	question you have to ask is where does the water come
15	from and how does it come from. So there are
16	discontinuities there, it's clear.
17	The first question which was waste maybe,
18	can it be due to the old older constantly seeping back
19	through soil from under this high hydraulic rate. And
20	if you make the calculations, you end up with a water
21	fill per day of 7 micrometer. So it cannot be the
22	water which you observe. And that directly evaporates
23	in this humidity condition.
24	So it must be a very localized response.
25	The second one is if we look at that

(202) 234-4433

	74
1	picture, now comes the picture with the joints and you
2	are seeing sequence of construction. So they first
3	made the outside bays. And, you know, concrete is
4	exothermic, is made with sediment. Sediment hydration
5	is exothermic reaction.
6	Sot he temperature goes up and then it
7	cools down.
8	Now then they made the inner parts, so the
9	core, which is even much thicker. So the water is in
10	between while the inner part was heating, the outer
11	part was already cooling. And then you directly know
12	where it comes from. Imagine just that the core here
13	swells while the other part shrinks and you get
14	exactly there at those construction joints, you get
15	stress concentration and this continued.
16	MEMBER WALLIS: Well, you think it comes
17	from that inner octagon there?
18	DR. ULM: Exactly. Now let's say those
19	areas, of course, it's the way they emerge. If you
20	look very very carefully. First of you all you see in
21	bay 10. You see two construction joints, a vertical
22	and a horizontal one. You know, that's made to happen
23	at that joint. This is unavoidable in all concrete
24	applications.
25	Same thing bay 6, which is similar type of

(202) 234-4433

	75
1	configuration.
2	Now if you look at bay
3	MEMBER WALLIS: But it doesn't come from
4	the bolts. It comes from the main construction joints
5	in the concrete.
6	DR. ULM: It is that is weakened by that
7	point. That's my analysis would be to identify why
8	does it come from. Because I cannot see the reason it
9	was to raise the question before that if you make the
10	bolt inside the material, would you actually crack
11	something, would you damage it. Well, that's not the
12	case. Because if you think about any tunneling
13	operation, actually it doesn't create stress
14	concentrations in contrast to if you would wedge
15	something out. So that's the reason why it's actually
16	pretty homogeneous. So that actually does not create
17	sufficient stress intensity on
18	MEMBER SHACK: If you tighten up on the
19	bolts, you're going to create stress concentration
20	down there.
21	DR. ULM: But if you would get it
22	radiated, which would not propagate downwards. It
23	goes down two feet?
24	MR. DYCKMAN: Two feet.
25	DR. ULM: Two feet and you have six feet

(202) 234-4433

	76
1	left. You know, you really must so it cannot come
2	from additional damage from that.
3	So the only source then of that here which
4	really is over the entire depth, because you have to
5	go from the bottom upwards of the joints from the
6	construction level.
7	Now could they have done it better? Well,
8	honestly I've worked on so many concrete projects, you
9	cannot avoid those cracks if you have those massive
10	things, except for if you start, you know, moving
11	different layers, let it cool down and construct.
12	It's not over four years, but over 20 years and then
13	it becomes
14	MEMBER ABDEL-KHALIK: So why are they
15	saying that the water comes up through the bolts?
16	DR. ULM: Well, first of all, it's
17	assembled in this here. We have no direct record
18	whether it comes through the direct to the bolt itself
19	or in that area. Now please note the area where they
20	have it from the bolt here, you see for instance bay
21	10, you have it both sides, right? The red points
22	which is indicated there is that it's a large area.
23	It's a specific area, which happens to be that the
24	bolts are wet because there where you see most of the
25	water actually standing, right? But what you see
I	

(202) 234-4433

	77
1	actually there are areas in which it occurs.
2	MEMBER ARMIJO: Is it typical that those
3	membranes fail then? You know, are the membranes put
4	there with the expectation that they'll do some good
5	but they're not expected to be impervious?
6	DR. ULM: Yes. Unfortunately, this is the
7	case. At the time, and I think also in the '80s and
8	'90s when people built it, they still believed that
9	those membranes would protect it forever. But it is
10	a real problem. We all know that they are not, you
11	have to do other things today. And if you were to
12	rebuilt it, I think you would use other type of
13	protective system.
14	So, that's the first thing: Where does
15	the water come from?
16	Now the second question then which arises
17	from those is to answer question how does it if it
18	comes from there, what actually does that, this water
19	seepage in terms of effecting your structural
20	integrity? That's the second question which you want
21	to answer.
22	Now, what I've done on the request here,
23	you're taking the observations, taking sort of the
24	surface areas. What I did, I calculated, I took the
25	following problem. I said, okay, let me put at the

(202) 234-4433

bay or the joints into one cylinder. And let me calculate what is the diameter of the cylinder in order to explain the amount of water which you observe on the surface.

5 When you do this, you end up with a calculation of basically that all those add up to 6 7 something four millimeter, so that's 1/6th of an inch 8 size cylinder of water which is there. It's not much, 9 but given the hydraulic pressure which you have there, the hydraulic head difference, 25 feet -- well, you 10 know it's sufficient in order to bring that water up 11 there. And so that's a maximum size of -- you can 12 13 expect.

14 MEMBER WALLIS: Does this water corrode 15 the bolts and the cones?

MR. BETHAY: Franz or Barry.

17 MR. GORDON: Yes. Still you have a high pH of your concrete bore water which will protect the 18 19 If there is any subsequent corrosion of the bolts. 20 steel, you know, there will be a passive film on the steel. And in fact, in your NUREG-6927 it 21 22 demonstrates that you get corrosion. It actually 23 increases the bonding between the steel and the 24 concrete, just like 200/300 percent.

MEMBER WALLIS: Unless you have enough --

NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

16

25

	79
1	MR. GORDON: Unless it starts actually
2	cracking the concrete.
3	MEMBER WALLIS: Presumably as it corrodes
4	it grows and it gets tighter?
5	MR. GORDON: Yes. Yes. But it would take
6	bore force to pull it out, that's correct.
7	DR. ULM: Let's
8	bear in mind the four millimeter size, right.
9	You don't have a complete reinforcement mat one beside
10	the other. Actually, you saw you had quite a bit
11	spacing in between. The likelihood that you hit
12	exactly with one reinforcement those four millimeter
13	diameter is very small. So the localized nature
14	actually saves you of this here. There's a pH value
15	which is on the order of 9.4, which is lower than the
16	typical pH value which you have in concrete, which is
17	12.13 or rather on the 13 side which I expect to be
18	everywhere in the concrete will be well protected.
19	Around those local and that means including the
20	bolt anchors, I expect that maybe some corrosion would
21	be worthwhile to dig into that local corrosion
22	MEMBER SHACK: So you are arguing that if
23	you're getting the low pH because this is all local
24	channeled water, you're not getting as much
25	dissolution as you might expect from a

(202) 234-4433

	80
1	DR. ULM: You not get so much you know,
2	all over that.
3	MEMBER SHACK: Not as much alkalinity as
4	you would expect
5	DR. ULM: That's right.
6	MEMBER SHACK: because you're getting
7	a more direct transport of the water?
8	DR. ULM: That's right. That's right. In
9	addition what you have observed is that the calcium
10	concentration, the water which has been measured
11	actually in the calcium concentrated which was
12	measured in the water, is lower than the calcium
13	concentration which holds the back in the
14	concrete. So you have around those joints some
15	dissolution phenomena. But those dissolution
16	phenomena are, unfortunately, so slow that they don't
17	do much harm actually to the structure, at least not
18	in the time scales you're looking at.
19	MEMBER SHACK: But they've got one
20	measurement of chloride level that's fairly high.
21	DR. ULM: Yes.
22	MR. BETHAY: And maybe we could jump ahead
23	to go to slide 62.
24	MEMBER ABDEL-KHALIK: Before we do that,
25	now in the equivalent four millimeter diameter hole

(202) 234-4433

	81
1	what is the calculated flow rate? What is the
2	calculated seepage rate?
3	DR. ULM: What I actually did, I mean the
4	model is basically the pressure flow through a
5	cylinder. And what I said, let's say I said okay, I
6	concentrate all this here and then I got the
7	information that basically 20 square meter face on the
8	top of one bay was filled with a water film of one-
9	quarter of an inch of water. And if they dried it out
10	and it came out it was after one day or two days that
11	you have this flow rate. So I had the entire flow
12	rate of flow mass that came up.
13	Now by setting this here per day equal to
14	the flow which I need under the pressure gradient with
15	the flowing through it, you can back calculate the
16	diameter or the radius of the cylinder.
17	MEMBER ABDEL-KHALIK: And what is that
18	flow rate, do you recall?
19	DR. ULM: I don't have it here. I have it
20	on my computer. I can show it. But the flow rate
21	actually was relatively high because, you know, you
22	get through four millimeter in there. It was pretty
23	high. So that was actually also the reason when I
24	looked at the problem, the calcium region may well
25	have reached those bolt anchors was one of my

(202) 234-4433

	82
1	conclusions from that. It was pretty high, actually.
2	MEMBER ABDEL-KHALIK: Well, what's pretty
3	high? One gallon per minute, ten gallons per minute?
4	DR. ULM: No, no, no. I mean, no, no.
5	We're not on this yet. I would say we're speaking
6	about a foot per day. So that's what I'm talking about
7	here. This is a foot, and then you have to take the
8	volume. To permeability to concrete, yes. So typical
9	velocities which is to concrete, which is very small
10	rate.
11	MEMBER ABDEL-KHALIK: Okay. Thank you.
12	MR. BETHAY: And I think why don't we jump
13	the pictures to slide 62.
14	MEMBER WALLIS: There's no tritium in this
15	water?
16	MR. BETHAY: There is tritium in the
17	water.
18	MEMBER WALLIS: How much tritium is in the
19	water.
20	MR. BETHAY: It would be amazing if there
21	were not.
22	MEMBER WALLIS: Yes, but how much?
23	MR. BETHAY: It was sampled for tritium,
24	and we have that report. I'm not going to try to
25	quote the numbers off the top of my head. We have
	1

(202) 234-4433

	83
1	that report with us for the water.
2	Bryan?
3	MR. FORD: I can call up the numbers for
4	you.
5	I'm sorry. My name is Bryan Ford. I can
б	call up the numbers for you during the break. But when
7	we sampled for tritium what we found was numbers that
8	were indicative of equilibrium with the tritium
9	concentration in the air of the building. It was
10	much, much lower than tritium concentrations from,
11	say, the spent fuel pool. So it was indicative of
12	water that was in an equilibrium with the reactor
13	MEMBER WALLIS: Tritium does come from
14	nuclear reactions. It's not a natural thing. It just
15	decays away.
16	MR. FORD: Yes. But since we have tritium
17	in our spent fuel pool and our spent fuel pool
18	evaporates, we have an equilibrium concentration in
19	the reactor building atmosphere. So that's what we
20	compared it to.
21	MEMBER WALLIS: Okay.
22	MR. BETHAY: Next slide was just to show
23	you some of the water chemistry results that we've
24	seen over the years. Unfortunately, not every analysis
25	was done every time, so there's some holes in the
ļ	

(202) 234-4433

	84
1	analyses.
2	The minimum threshold limits that are
3	established by the GALL are shown at the top with a pH
4	greater than 5.5 of chlorides, less than 500 in
5	sulfates, less than 1500 would establish a threshold
6	of acceptable, I'll say, water chemistry.
7	You can see that our ground water, which
8	we sampled in the vicinity of the reactor building,
9	has a nominal pH of around 6.2, chlorides between 200
10	and 400, and sulfates somewhere between 5 and 16 ppm.
11	And you can see that in 1989 when this is
12	now inside the building when the floor was sampled, it
13	indicated a pH of around 8.7, 8.8, chlorides around
14	120, calcium around 292 ppm.
15	In '88 and early '07 the water was again
16	sampled just for pH, it wasn't sampled for it's of
17	course, who knew at the time.
18	In March of this year we sampled it again.
19	It indicated a pH of about 9.3, chlorides of about
20	560, sulfates of 9.1 and then the calcium very low. We
21	think that had to do with differences in degree of
22	cleaning and how well the floor was cleaned and
23	decon'ed before the samples were collected.
24	MEMBER WALLIS: Presumably ground water
25	near the ocean gets chlorides from ocean spray and you
I	1

(202) 234-4433

	85
1	know fine sea driven mists and things. There's a
2	transport of sea water through the air. That's not
3	insignificant.
4	MR. BETHAY: I don't think that would
5	contribute substantially to the ground water, which is
6	flowing under the basical till. Maybe Gary or
7	somebody else could help me a little more with that.
8	MEMBER WALLIS: It's a very slow ground
9	water flow.
10	MR. BETHAY: It is very slow.
11	MR. BETHAY: Are you going to pick up
12	MEMBER ARMIJO: But that's more chlorides.
13	It seems pretty
14	MEMBER SHACK: I mean that threshold on
15	chlorides sort of assumes you have a pH. I mean, what
16	you really have is a kind of a chloride oH balance.
17	And, you know you're really assuming the concrete is
18	probably higher than 9.
19	MR. GORDON: Again, Barry Gordon
20	Structural Integrity.
21	And these are measurements, you know, they
22	pick up CO_2 while they're measuring it, you know. And
23	probably if you just did it raw, it would probably be
24	2 points higher than that.
25	MEMBER SHACK: You're right. You're right.
	I

(202) 234-4433

	86
1	I mean this stuff is sitting there on the floor.
2	MR. GORDON: Yes.
3	MEMBER SHACK: Yes. Okay.
4	MEMBER WALLIS: But technically speaking
5	560 is bigger than 500.
6	MR. BETHAY: Technically that's correct.
7	MR. GORDON: That's also, that's on the
8	surface and that's where it's been concentrated, you
9	know. I mean who knows how many times it's been
10	concentrated. It's not inside the concrete adjacent
11	to embedded steel. So, it could be a build up over a
12	period of time and as it evaporates you're going to be
13	concentrating the amount of chloride on the surface.
14	MR. BETHAY: Thank you, Barry.
15	So our assessment findings and Dr. Ulm may
16	yes sir.
17	MEMBER ABDEL-KHALIK: If we go to some of
18	these pictures, these white deposits on the floor have
19	a fine
20	MR. BETHAY: Which bay, and we'll go back
21	to it?
22	MEMBER ABDEL-KHALIK: Bay 10 on page 26.
23	MR. BETHAY: Can we go back to that.
24	Let's go back. Okay.
25	MEMBER ABDEL-KHALIK: These white deposits
I	1 I I I I I I I I I I I I I I I I I I I

(202) 234-4433

	87
1	especially on the left picture appear to have a finite
2	thickness. I mean I can't tell from the perspective,
3	but it looks like these are at least a quarter inch
4	thick. The white deposits.
5	MR. BETHAY: No. That's an optical
6	illusion. It's a calcium salt deposit on the floor
7	that actually you can see it. When I was down there
8	Monday, I tried to scratch some of it loose with my
9	finger, and it's you know, it's a very think layer.
10	It's not an inch thick layer on the floor.
11	Now if you go to bay 6 it's more
12	MEMBER ARMIJO: But you've never taken a
13	sample of that calcium deposit or what you think is
14	calcium and analyzed the chloride
15	MR. BETHAY: This is part of the water
16	analysis.
17	MEMBER ARMIJO: But you've actually in
18	that case, you just analyzed water. You didn't
19	actually take the salt
20	MR. GORDON: No. There is a sample
21	analysis off the deposit.
22	DR. ULM: The deposit, which shows
23	basically dominating calcium.
24	MEMBER ARMIJO: Calcium hydroxide or
25	oxide?

(202) 234-4433

	88
1	MR. GORDON: Just calcium.
2	DR. ULM: Calcium, but it's not a
3	hydroxide.
4	MEMBER ABDEL-KHALIK: Can one sort of
5	estimate the total amount of water that seeped through
6	over the years by looking at the volume of this white
7	material?
8	MR. BETHAY: We have not done that to try
9	to estimate over the years. I think what we could
10	estimate is it's a fairly constant in most areas the
11	amount of water. So, you know you see 80 square feet
12	that generally stays wet, particularly in this area.
13	So at equilibrium, it's coming in, it's evaporating
14	go ahead, Franz.
15	DR. ULM: Maybe I can say something. So
16	this is a phenomenon of what is known as calcium
17	leaching. Leaching is the phenomenon that you have a
18	concentration of calcium in your pour solution which
19	has been low, the equilibrium concentration which
20	holds the calcium in here solidly. What happens is in
21	order to balance here, it dissolves part of the
22	calcium into the pour solution and transport it away.
23	You were asking before about the high
24	velocity. Because you have this high velocity, it's
25	transported upwards. And that's the reason why you see

(202) 234-4433

	89
1	it up there. That's why I'm believing that it's very
2	localized.
3	Can you completely reconstruct this
4	history? Well, for that you need basically a
5	permanent monitoring of the flow velocity. Only in
6	that way could you reconstruct
7	MEMBER WALLIS: Does this calcium come
8	from the concrete?
9	DR. ULM: Yes. From the
10	MEMBER WALLIS: So presumably it's making
11	the hole bigger?
12	DR. ULM: Well, it indeed does But let me
13	give you a number. Let's say how fast is this? It's
14	basically 0.1 millimeter per square root of days.
15	That's a very, very slow process. It is
16	MEMBER WALLIS: But it is making the hole
17	bigger by washing out calcium?
18	DR. ULM: It does. It does actually. It
19	increase the porosity, it actually takes away first
20	what is called the and then it attacks the calcium
21	acidic hydrates in there. But this is such a slow
22	process that this is not relevant at the time scales
23	you're looking at. It's a very important development
24	for nuclear waste disposal structures, but it's not
25	because there you speak about 10,000 years. But for

(202) 234-4433

	90
1	that type of scale, time scales you're looking at it
2	is not relevant. But it is sufficient in order to
3	transport the amount of calcium dissolved into the
4	pour solution upwards to the surface.
5	MR. BETHAY: So if you'd go to slide 62.
6	So just to try to bring this piece of it
7	to a conclusion, to follow up on Dr. Ulm's assessment
8	findings, and he can certainly join in, that the
9	ground water migration is a highly localized
10	phenomenon through very small imperfections.
11	That the path is most likely through the
12	vertical construction joints and the zones most likely
13	weakened by the tensions and stresses created during
14	the settling of the concrete pours, particularly in
15	light of the way the five structures were built.
16	That the localized zones are
17	discontinuities equivalent to a cylinder all the way
18	through the base mat on the order of 4 millimeters.
19	And that the localized calcium leaching
20	doesn't affect the overall structural performance of
21	the slab, primarily because of the time frames
22	involved that it would cause any adverse situation.
23	MEMBER SHACK: Now is this for each of the
24	bays it's equivalent to a four millimeter hole, or
25	that's the total base mat leakage you're estimating?
	1

(202) 234-4433

	91
1	DR. ULM: No. For each bay.
2	MEMBER SHACK: Each bay?
3	MEMBER WALLIS: So what are you going to
4	do about it?
5	CHAIRMAN MAYNARD: That's what the next
6	slide, I believe.
7	MR. BETHAY: That's what the next slide is
8	about.
9	So because of the work that Dr. Ulm has
10	done for us, he's made a number of recommendations to
11	us.
12	First, that the calcium leaching may have
13	reached the annular space around the bolt. And we
14	will be inspecting bolts and grout around them to
15	verify, first, is that really the source of the
16	leakage that we see. Second, what's the integrity of
17	the bolt. We don't believe there's any adverse effect,
18	but we'll look at it. And third, what's the condition
19	of the grout.
20	MEMBER WALLIS: Aren't you going to sort
21	of mark lines on the floor about how the tide is and
22	see if the tide is rising in the room?
23	MR. BETHAY: We don't believe this any
24	connection to the tides.
25	MEMBER WALLIS: You leave it damp like

(202) 234-4433

	92
1	that. No, I mean it just gets colloquial. But I
2	mean, presumably this wet region is spreading, isn't
3	it?
4	MEMBER SHACK: The holes are getting
5	bigger?
6	MEMBER WALLIS: The holes are getting
7	bigger. I would think it's spreading. So you're
8	going to monitor the spreading of the water?
9	MR. BETHAY: We're going to monitor the
10	water. Until we identified the definitive the cause,
11	the next action is, you know, it's localized zones.
12	MEMBER BONACA: Before you move, answer
13	the question now. Before you move, I mean you kept
14	saying we would look at it. What do you mean by "we
15	would look at it?" I mean could you be a little more
16	specific?
17	MR. BETHAY: If you go back to bay 9, Ed,
18	for a second. Okay. Bay 2.
19	This one's obviously dry, but it's a
20	better picture. What we'll do is loosen this nut on
21	several of these bolts. We'll raise this base plate up
22	and we will inspect the condition of the bolt as it
23	passes into the grout. And we will inspect the
24	condition of the grout around the hole. And based on
25	what we find, then we'll enter that in our corrective
1	I

(202) 234-4433

	93
1	action process and go wherever that leads us. But the
2	intent is to loosen this bolt, raise the plate and
3	perform an inspection of the grout, the concrete and
4	the bolt in this area.
5	MEMBER ARMIJO: So you'll be doing that in
6	bay 10 where the worst apparent problem is?
7	MR. BETHAY: We'll be doing it right now.
8	Right. The maintenance request to do this is in the
9	planning stage. And it will look at a sampling of the
10	bolts in bay 10, because that's the worst. And then
11	we'll expand scope if necessary based on whatever we
12	find when we do that inspection.
13	MEMBER WALLIS: I would think the extent
14	of the damp area would change with the seasons and so
15	on, because the humidity of the air and everything
16	changes how fast it dries.
17	MR. BETHAY: It changes with the humidity,
18	that's correct.
19	MEMBER WALLIS: Well, you've seen all
20	that, haven't you? You've seen it come and go during
21	the winter and summer?
22	MR. BETHAY: We've seen it come and go.
23	Go to bay 6, please. That's gone. It's
24	been there, but it's not wet now.
25	MEMBER WALLIS: That's right. So it dried

(202) 234-4433

	94
1	up?
2	MR. BETHAY: It dried up. So we do see
3	the water
4	MEMBER WALLIS: There is a kind of history
5	when it dries up. When it gets wetter, you don't have
6	quite the same history exposed?
7	MR. BETHAY: That's right. That's correct.
8	Yes, sir.
9	MEMBER WALLIS: So you're going to keep
10	track of it?
11	MR. BETHAY: Yes, sir. Yes. Our
12	intention is to keep track of the water, the chemistry
13	of the water until obviously until we identify a
14	fix to stop the water.
15	CHAIRMAN MAYNARD: If you can get to slide
16	65, I think it's not bulletized list of things.
17	MR. BETHAY: Right. If you go to 65, Ed.
18	This is a summary of where we plan to go.
19	That we'll verify the condition of the
20	bolts by sample in bay 10, is what we've lined out.
21	We'll do that prior to extended operation, and
22	actually that's
23	MEMBER WALLIS: Once in ten years?
24	MR. BETHAY: I'm sorry?
25	MEMBER WALLIS: Well, I mean I'm always
	I contract of the second se

(202) 234-4433

	95
1	astounded by these inspections every ten years or
2	something. Presumably something might be happening
3	this year.
4	MR. BETHAY: Well, there's a difference
5	between what we'll put as an actual regulatory
6	commitment and what we'll
7	MEMBER WALLIS: What we'll actually do?
8	MR. BETHAY: actually do.
9	MEMBER WALLIS: I would think whenever you
10	had an opportunity, you'd take a look and see what's
11	going on down there.
12	MR. BETHAY: That's our actual plan. As
13	I said, we're going to go down and look at the bolts.
14	This is on routine rounds. You know, if anything
15	changes from what's I'll say the norm, that's
16	identified in our corrective action program and we
17	would take corrective action.
18	MEMBER WALLIS: Do people go down there
19	from time-to-time?
20	MR. BETHAY: Oh, yes. Yes.
21	MEMBER WALLIS: They look and see if it's
22	wetter?
23	MR. BETHAY: Well, they look an see is it
24	different from what I've seen before.
25	MEMBER WALLIS: So this five and ten years
1	1 A State of the second s

(202) 234-4433

	96
1	doesn't mean anything on that scale. It's being looked
2	at several times a year?
3	MR. BETHAY: It's being looked at
4	routinely, that's correct. But what we're planning to
5	do beyond that sort of thing, is to actually go, I'll
6	say, disassemble some of this and look at what's
7	underneath.
8	MEMBER WALLIS: So if over a period of
9	months you suddenly got an inch water on the floor
10	someone would have seen it, right?
11	MR. BETHAY: Yes. That's correct.
12	MR. SULLIVAN: Operators make tours of the
13	torus room routinely. I think it's twice a week
14	they're down there.
15	MEMBER WALLIS: Okay. So that's better.
16	Now I'm more
17	CHAIRMAN MAYNARD: I would think your
18	corrective action program would require you to take
19	some action if
20	MR. BETHAY: Absolutely. Yes. You know,
21	this has been analyzed many times. And I'll say that
22	people, the operators that are down there, they know
23	that there's water on the floor from time-to-time.
24	They know because they're there the quantity of water
25	that's there. My expectation would be that if they
	I contract of the second se

(202) 234-4433

	97
1	saw significantly more or significantly less,
2	something has changed and that should be identified in
3	our corrective action process for evaluation.
4	MEMBER WALLIS: That might depend on the
5	safety culture of the plant what they do.
6	MR. BETHAY: I believe that our operators
7	would do just as I described.
8	So in slide 65, as I mentioned, we will
9	verify the condition of the bolts. We'll determine
10	whatever actions are necessary based on the bolt
11	inspections and what that shows us.
12	We'll continue to monitor the chemistry of
13	the water on the floor and the ground water.
14	And then from a macroscopic point of view,
15	our structures monitoring program will continue to
16	ensure that the overall structural integrity of the
17	building is sound as evidence by things like
18	significant cracking, spalling, settlement of the
19	buildings.
20	MEMBER BONACA: Are these actions tied to
21	license renewal or are you going to initiate them
22	before?
23	MR. BETHAY: These actions?
24	MEMBER BONACA: Yes.
25	MR. BETHAY: These actions are ongoing.
	I

(202) 234-4433

	98
1	We've been doing these. And although as Dr. Wallis
2	says, it says five or ten years, it in fact is an
3	ongoing process, an ongoing evaluation.
4	CHAIRMAN MAYNARD: I think we'll also get
5	an opportunity to talk to the Staff about what ends up
6	being requirements versus just what they're doing and
7	stuff. Licensees always like to undercommit and
8	overperform.
9	MEMBER ARMIJO: You maintain flexibility
10	when you decide that you don't need to do it anymore,
11	it's not a license commitment, so you're
12	MEMBER WALLIS: But does the NRC resident
13	inspector take a look at these floors from time-to-
14	time, too?
15	MR. BETHAY: He goes down there. I'd
16	rather you ask him that question. But I know they go
17	down there.
18	So with that, if there are any questions
19	we can probably finish up
20	CHAIRMAN MAYNARD: What I'd like to do,
21	we're at lunchtime right now. And we're ready for the
22	next topic. We still have an hour for you after
23	lunch.
24	So what I intend to do is to take an hour
25	break here for lunch and then we'll come back and
	I contraction of the second

(202) 234-4433

	99
1	finish up on the other open item. And if we have any
2	thought of any other questions that we want to ask on
3	this, we'll have an opportunity and then it'd be the
4	Staff's turn to get up here.
5	So with that, we'll take a break. We'll
6	come back at 10 after 1:00.
7	(Whereupon, at 12:04 p.m. the Subcommittee
8	was adjourned to reconvene this same day at 1:08 p.m.)
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

	100
1	A-F-T-E-R-N-O-O-N S-E-S-S-I-O-N
2	1:08 p.m.
3	CHAIRMAN MAYNARD: All right. I think we
4	can go ahead and get started. Bring the session back
5	into order.
6	Steve, turn it over to you and I think
7	we're ready to talk about fluence.
8	MR. BETHAY: All right. Thank you very
9	much.
10	One point I would like Ed, before you
11	do that. One thing I would like to go back on,
12	though, is a question I think Dr. Wallis raised
13	regarding was there any material in the air gap
14	between the concrete and the shell. And I believe
15	that I said the foam was removed during construction.
16	Some of my colleagues pointed out I should clarify
17	that.
18	The way this was constructed was as the
19	panels were poured there was a foam sheet or block put
20	in that was then pulled out as the pours were made
21	going up the side. At the upper elevations, though,
22	there was an FME barrier put in below that so that
23	when they pulled the sheets of foam out to make the
24	next concrete pour, an FME barrier was put in.
25	In the upper elevations the FME barrier
1	

(202) 234-4433

	101
1	may still be there, which that dictates those upper
2	elevation levels where we do the UTs at the 72 and 84
3	foot elevation. But that's why those were selected in
4	case that FME barrier were still there. And that would
5	be a puddling location should there be any water.
6	So I just wanted to make that point of
7	clarification.
8	MEMBER WALLIS: Well, thank you.
9	CHAIRMAN MAYNARD: Good.
10	MR. BETHAY: Okay. Moving onto the final
11	open item in the Safety Evaluation Report. It has to
12	do with the lack of benchmarking data to support plant
13	specific fluence calculations for use in time limiting
14	aging analysis.
15	Simplistically, what we determined here
16	was a significant delta between the fluence values as
17	indicated by our reactor vessel surveillance capsules
18	and the fluence value predicted by the computer code.
19	The computer code fairly significantly underpredicted
20	the fluence level that we got from the in vessel
21	dosimetry. And that gap between actual measured on
22	the surveillance capsules and the predicted by the
23	computer code was beyond a level that was acceptable
24	to the NRC Staff to develop P-T curves for the period
25	of extended operation. That's the gist of why this
	I contract of the second se

(202) 234-4433

	102
1	open item exists.
2	CHAIRMAN MAYNARD: And the actual measure
3	was higher than the computer predicted?
4	MR. BETHAY: Yes, sir. That's correct.
5	So a couple of aspects of this that I just
6	wanted to highlight to the Committee. You know, this
7	is not just a license renewal issue. You know we have
8	to comply with 10 CFR 50 Appendix G for normal
9	operations. So this is a current day, current
10	licensing basis issue as well as for the license
11	renewal term.
12	Our current pressure temperature curves
13	that were recently approved by the Staff are valid
14	through cycle 18. So through 2011, which is obviously
15	before the current license term expires.
16	As part of that license amendment we have
17	a commitment to submit an action plan for final
18	resolution of this. In other words, how are we going
19	to develop curves that fully comply with the reg
20	guide. And we've committed to provide that resolution
21	plan by September of this year to the Staff for their
22	review and evaluation.
23	And we've also got a commitment that based
24	on the outcome of that plan, that we'll submit
25	calculations that fully comply with Reg Guide 1.19 by

(202) 234-4433

	103
1	June of 2010 which is in support of startup from RFO
2	18. Again, this is all current licensing basis
3	information prior to the term of extended operation.
4	So in order to move forward on this and
5	the license renewal term and then I was remiss in
6	not introducing Tim Griesbach is with us today. He's
7	with Structural Integrity and has been doing a lot of
8	the analysis for us in resolving this issue. And Ray
9	Pace, who is our mechanic civil design supervisor at
10	the plant.
11	Our current actions are to evaluate the
12	time limiting aging analyses that we have in place for
13	the vessel to determine what the limiting fluence
14	levels would be for those components. And based on
15	that to determine a limiting beltline adjusted
16	reference temperature and upper shelf energy based on
17	those limiting fluence levels. To look at the vessel
18	internals, the welds and the nozzles near the
19	beltline.
20	The core shroud fluence is limiting based
21	on BWRVIP-35 specifications. And we've determined
22	that in all cases for the period of extended operation
23	that the limiting fluence values would not be
24	challenged continuing to operate the plant.
25	MEMBER SHACK: What does it mean that the
	1

(202) 234-4433

1 core shroud fluence is limiting? 2 MR. BETHAY: I'll ask Tim to fill in the 3 details. 4 MR. GRIESBACH: There are criteria in th 5 BWRVIP document to maintain the properties of the 304 6 stainless steel below a certain fluence. So there's 7 fluence limitations also for areas outside the vessel. 8 And fluence levels that would be projected if you 9 would scale everything up, you would reach a limit for 10 the shroud or you would reach a practical limit for 11 the vessel material. 12 MEMBER SHACK: This is a toughness limit 13 based on a crack size you can't detect or something? 14 MR. GRIESBACH: No. It's just a crack 15 elements thing you don't want to go above a certain 16 fluence. It still operate for internals. And so it's 17 based on data for 304 stainless. 18 MEMBER SHACK: It's an IASCC limit then? 19 MR. GRIESBACH: Essentially, yes. 20 MEMBER SHACK: Okay. Which is? 21 MR. GRIESBACH: I think it's about eight 22 MEMBER SHACK: And you're going to hit		104
2 MR. BETHAY: I'll ask Tim to fill in the 3 details. 4 MR. GRIESBACH: There are criteria in th 5 BWRVIP document to maintain the properties of the 304 6 stainless steel below a certain fluence. So there's 7 fluence limitations also for areas outside the vessel. 8 And fluence levels that would be projected if you 9 would scale everything up, you would reach a limit for 10 the shroud or you would reach a practical limit for 11 the vessel material. 12 MEMBER SHACK: This is a toughness limit 13 based on a crack size you can't detect or something? 14 MR. GRIESBACH: No. It's just a crack 15 elements thing you don't want to go above a certain 16 fluence. It still operate for internals. And so it's 17 based on data for 304 stainless. 18 MEMBER SHACK: It's an IASCC limit then? 19 MR. GRIESBACH: Essentially, yes. 20 MEMBER SHACK: Okay. Which is? 21 MR. GRIESBACH: I think it's about eight 22 MR. GRIESBACH: And you're going to hit 23 MEMBER SHACK: And you're going to h	1	core shroud fluence is limiting?
3 details. 4 MR. GRIESBACH: There are criteria in th 5 BWRVIP document to maintain the properties of the 304 6 stainless steel below a certain fluence. So there's 7 fluence limitations also for areas outside the vessel. 8 And fluence levels that would be projected if you 9 would scale everything up, you would reach a limit for 10 the shroud or you would reach a practical limit for 11 the vessel material. 12 MEMBER SHACK: This is a toughness limit 13 based on a crack size you can't detect or something? 14 MR. GRIESBACH: No. It's just a crack 15 elements thing you don't want to go above a certain 16 fluence. It still operate for internals. And so it's 17 based on data for 304 stainless. 18 MEMBER SHACK: It's an IASCC limit then? 19 MR. GRIESBACH: Essentially, yes. 20 MEMBER SHACK: Okay. Which is? 21 MR. GRIESBACH: I think it's about eight 22 times ten to the 21st, if my memory serves me. 23 MEMBER SHACK: And you're going to hit 24 that on your core shroud? <td>2</td> <td>MR. BETHAY: I'll ask Tim to fill in the</td>	2	MR. BETHAY: I'll ask Tim to fill in the
4 MR. GRIESBACH: There are criteria in th 5 BWRVIP document to maintain the properties of the 304 6 stainless steel below a certain fluence. So there's 7 fluence limitations also for areas outside the vessel. 8 And fluence levels that would be projected if you 9 would scale everything up, you would reach a limit for 10 the shroud or you would reach a practical limit for 11 the vessel material. 12 MEMBER SHACK: This is a toughness limit 13 based on a crack size you can't detect or something? 14 MR. GRIESBACH: No. It's just a crack 15 elements thing you don't want to go above a certain 16 fluence. It still operate for internals. And so it's 17 based on data for 304 stainless. 18 MEMBER SHACK: It's an IASCC limit then? 19 MR. GRIESBACH: Essentially, yes. 20 MEMBER SHACK: Okay. Which is? 21 MR. GRIESBACH: I think it's about eight 22 times ten to the 21st, if my memory serves me. 23 MEMBER SHACK: And you're going to hit 24 that on your core shroud? 25 MR. GRIESB	3	details.
5 BWRVIP document to maintain the properties of the 304 6 stainless steel below a certain fluence. So there's 7 fluence limitations also for areas outside the vessel. 8 And fluence levels that would be projected if you 9 would scale everything up, you would reach a limit for 10 the shroud or you would reach a practical limit for 11 the vessel material. 12 MEMBER SHACK: This is a toughness limit 13 based on a crack size you can't detect or something? 14 MR. GRIESBACH: No. It's just a crack 15 elements thing you don't want to go above a certain 16 fluence. It still operate for internals. And so it's 17 based on data for 304 stainless. 18 MEMBER SHACK: It's an IASCC limit then? 19 MR. GRIESBACH: Essentially, yes. 20 MEMBER SHACK: Okay. Which is? 21 MR. GRIESBACH: I think it's about eight 22 times ten to the 21st, if my memory serves me. 23 MEMBER SHACK: And you're going to hit 24 that on your core shroud? 25 MR. GRIESBACH: No. If you scaled	4	MR. GRIESBACH: There are criteria in the
 stainless steel below a certain fluence. So there's fluence limitations also for areas outside the vessel. And fluence levels that would be projected if you would scale everything up, you would reach a limit for the shroud or you would reach a practical limit for the vessel material. MEMBER SHACK: This is a toughness limit based on a crack size you can't detect or something? MR. GRIESBACH: No. It's just a crack elements thing you don't want to go above a certain fluence. It still operate for internals. And so it's based on data for 304 stainless. MEMBER SHACK: It's an IASCC limit then? MR. GRIESBACH: Essentially, yes. MEMBER SHACK: Okay. Which is? MR. GRIESBACH: I think it's about eight times ten to the 21st, if my memory serves me. MEMBER SHACK: And you're going to hit that on your core shroud? MR. GRIESBACH: No. If you scaled 	5	BWRVIP document to maintain the properties of the 304
fluence limitations also for areas outside the vessel. And fluence levels that would be projected if you would scale everything up, you would reach a limit for the shroud or you would reach a practical limit for the vessel material. MEMBER SHACK: This is a toughness limit based on a crack size you can't detect or something? MR. GRIESBACH: No. It's just a crack elements thing you don't want to go above a certain fluence. It still operate for internals. And so it's based on data for 304 stainless. MEMBER SHACK: It's an IASCC limit then? MR. GRIESBACH: It's about eight times ten to the 21st, if my memory serves me. MR. GRIESBACH: No. If you scaled	6	stainless steel below a certain fluence. So there's
8 And fluence levels that would be projected if you 9 would scale everything up, you would reach a limit for 10 the shroud or you would reach a practical limit for 11 the vessel material. 12 MEMBER SHACK: This is a toughness limit 13 based on a crack size you can't detect or something? 14 MR. GRIESBACH: No. It's just a crack 15 elements thing you don't want to go above a certain 16 fluence. It still operate for internals. And so it's 17 based on data for 304 stainless. 18 MEMBER SHACK: It's an IASCC limit then? 19 MR. GRIESBACH: Essentially, yes. 20 MEMBER SHACK: Okay. Which is? 21 MR. GRIESBACH: I think it's about eight 22 MEMBER SHACK: And you're going to hit 23 MEMBER SHACK: And you're going to hit 24 that on your core shroud? 25 MR. GRIESBACH: No. If you scaled	7	fluence limitations also for areas outside the vessel.
 9 would scale everything up, you would reach a limit for 10 the shroud or you would reach a practical limit for 11 the vessel material. 12 MEMBER SHACK: This is a toughness limit 13 based on a crack size you can't detect or something? 14 MR. GRIESBACH: No. It's just a crack 15 elements thing you don't want to go above a certain 16 fluence. It still operate for internals. And so it's 17 based on data for 304 stainless. 18 MEMBER SHACK: It's an IASCC limit then? 19 MR. GRIESBACH: Essentially, yes. 20 MEMBER SHACK: Okay. Which is? 21 MR. GRIESBACH: I think it's about eight 22 times ten to the 21st, if my memory serves me. 23 MEMBER SHACK: And you're going to hit 24 that on your core shroud? 25 MR. GRIESBACH: No. If you scaled 	8	And fluence levels that would be projected if you
 the shroud or you would reach a practical limit for the vessel material. MEMBER SHACK: This is a toughness limit based on a crack size you can't detect or something? MR. GRIESBACH: No. It's just a crack elements thing you don't want to go above a certain fluence. It still operate for internals. And so it's based on data for 304 stainless. MEMBER SHACK: It's an IASCC limit then? MR. GRIESBACH: Essentially, yes. MEMBER SHACK: Okay. Which is? MR. GRIESBACH: I think it's about eight times ten to the 21st, if my memory serves me. MEMBER SHACK: And you're going to hit that on your core shroud? MR. GRIESBACH: No. If you scaled 	9	would scale everything up, you would reach a limit for
11 the vessel material. 12 MEMBER SHACK: This is a toughness limit 13 based on a crack size you can't detect or something? 14 MR. GRIESBACH: No. It's just a crack 15 elements thing you don't want to go above a certain 16 fluence. It still operate for internals. And so it's 17 based on data for 304 stainless. 18 MEMBER SHACK: It's an IASCC limit then? 19 MR. GRIESBACH: Essentially, yes. 20 MEMBER SHACK: Okay. Which is? 21 MR. GRIESBACH: I think it's about eight 22 times ten to the 21st, if my memory serves me. 23 MEMBER SHACK: And you're going to hit 24 that on your core shroud? 25 MR. GRIESBACH: No. If you scaled	10	the shroud or you would reach a practical limit for
12MEMBER SHACK: This is a toughness limit13based on a crack size you can't detect or something?14MR. GRIESBACH: No. It's just a crack15elements thing you don't want to go above a certain16fluence. It still operate for internals. And so it's17based on data for 304 stainless.18MEMBER SHACK: It's an IASCC limit then?19MR. GRIESBACH: Essentially, yes.20MEMBER SHACK: Okay. Which is?21MR. GRIESBACH: I think it's about eight22times ten to the 21st, if my memory serves me.23MEMBER SHACK: And you're going to hit24that on your core shroud?25MR. GRIESBACH: No. If you scaled	11	the vessel material.
 based on a crack size you can't detect or something? MR. GRIESBACH: No. It's just a crack elements thing you don't want to go above a certain fluence. It still operate for internals. And so it's based on data for 304 stainless. MEMBER SHACK: It's an IASCC limit then? MR. GRIESBACH: Essentially, yes. MEMBER SHACK: Okay. Which is? MR. GRIESBACH: I think it's about eight times ten to the 21st, if my memory serves me. MEMBER SHACK: And you're going to hit that on your core shroud? MR. GRIESBACH: No. If you scaled 	12	MEMBER SHACK: This is a toughness limit
14MR. GRIESBACH: No. It's just a crack15elements thing you don't want to go above a certain16fluence. It still operate for internals. And so it's17based on data for 304 stainless.18MEMBER SHACK: It's an IASCC limit then?19MR. GRIESBACH: Essentially, yes.20MEMBER SHACK: Okay. Which is?21MR. GRIESBACH: I think it's about eight22times ten to the 21st, if my memory serves me.23MEMBER SHACK: And you're going to hit24that on your core shroud?25MR. GRIESBACH: No. If you scaled	13	based on a crack size you can't detect or something?
 15 elements thing you don't want to go above a certain 16 fluence. It still operate for internals. And so it's 17 based on data for 304 stainless. 18 MEMBER SHACK: It's an IASCC limit then? 19 MR. GRIESBACH: Essentially, yes. 20 MEMBER SHACK: Okay. Which is? 21 MR. GRIESBACH: I think it's about eight 22 times ten to the 21st, if my memory serves me. 23 MEMBER SHACK: And you're going to hit 24 that on your core shroud? 25 MR. GRIESBACH: No. If you scaled 	14	MR. GRIESBACH: No. It's just a crack
16 fluence. It still operate for internals. And so it's 17 based on data for 304 stainless. 18 MEMBER SHACK: It's an IASCC limit then? 19 MR. GRIESBACH: Essentially, yes. 20 MEMBER SHACK: Okay. Which is? 21 MR. GRIESBACH: I think it's about eight 22 times ten to the 21st, if my memory serves me. 23 MEMBER SHACK: And you're going to hit 24 that on your core shroud? 25 MR. GRIESBACH: No. If you scaled	15	elements thing you don't want to go above a certain
 based on data for 304 stainless. MEMBER SHACK: It's an IASCC limit then? MR. GRIESBACH: Essentially, yes. MEMBER SHACK: Okay. Which is? MR. GRIESBACH: I think it's about eight times ten to the 21st, if my memory serves me. MEMBER SHACK: And you're going to hit that on your core shroud? MR. GRIESBACH: No. If you scaled 	16	fluence. It still operate for internals. And so it's
 MEMBER SHACK: It's an IASCC limit then? MR. GRIESBACH: Essentially, yes. MEMBER SHACK: Okay. Which is? MR. GRIESBACH: I think it's about eight times ten to the 21st, if my memory serves me. MEMBER SHACK: And you're going to hit that on your core shroud? MR. GRIESBACH: No. If you scaled 	17	based on data for 304 stainless.
MR. GRIESBACH: Essentially, yes. MEMBER SHACK: Okay. Which is? MR. GRIESBACH: I think it's about eight times ten to the 21st, if my memory serves me. MEMBER SHACK: And you're going to hit that on your core shroud? MR. GRIESBACH: No. If you scaled	18	MEMBER SHACK: It's an IASCC limit then?
20 MEMBER SHACK: Okay. Which is? 21 MR. GRIESBACH: I think it's about eight 22 times ten to the 21st, if my memory serves me. 23 MEMBER SHACK: And you're going to hit 24 that on your core shroud? 25 MR. GRIESBACH: No. If you scaled	19	MR. GRIESBACH: Essentially, yes.
21 MR. GRIESBACH: I think it's about eight 22 times ten to the 21st, if my memory serves me. 23 MEMBER SHACK: And you're going to hit 24 that on your core shroud? 25 MR. GRIESBACH: No. If you scaled	20	MEMBER SHACK: Okay. Which is?
22 times ten to the 21st, if my memory serves me. 23 MEMBER SHACK: And you're going to hit 24 that on your core shroud? 25 MR. GRIESBACH: No. If you scaled	21	MR. GRIESBACH: I think it's about eight
 23 MEMBER SHACK: And you're going to hit 24 that on your core shroud? 25 MR. GRIESBACH: No. If you scaled 	22	times ten to the 21st, if my memory serves me.
 24 that on your core shroud? 25 MR. GRIESBACH: No. If you scaled 	23	MEMBER SHACK: And you're going to hit
25 MR. GRIESBACH: No. If you scaled	24	that on your core shroud?
	25	MR. GRIESBACH: No. If you scaled

(202) 234-4433

105 1 everything up evenly, well beyond the projected end of 2 fluence you've even seen and what would be the first limit practical limit you would reach. Would it be a 3 4 limit for the vessel, would it be a limit for upper 5 shelf energy drop or would your internals reach some limit that you would want to go beyond. 6 7 MEMBER SHACK: But you're not going to get 8 anywhere close to that even if at the end of your 9 cycle here, the extended life? 10 MR. GRIESBACH: No. We're many factors below that even in the worse case projected fluence. 11 MEMBER WALLIS: Now the limit for the 12 vessel is presumably more stringent than it is for the 13 14 shroud? 15 No. The other way around. MR. GRIESBACH: 16 MEMBER WALLIS: So the vessel is pressure 17 retaining element? 18 MR. GRIESBACH: Yes. 19 MEMBER WALLIS: The shroud just hangs 20 there, isn't it? 21 MR. GRIESBACH: The question is can you 22 maintain all of the ASME code criteria, regulatory 23 criteria for upper shelf energy --Great reality, yes. 24 MEMBER WALLIS: 25 MR. GRIESBACH: -- and such. And the

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

	106
1	answer is yes, the vessel could meet that well beyond
2	the fluence levels that are projected, but you would
3	reach a practical limit on the shroud, the internals,
4	before the vessel would reach its limit.
5	MEMBER WALLIS: At the same limit.
6	MR. COX: This is Alan Cox. I think I can
7	explain the difference here.
8	The fluence, that you're obviously going
9	to have a higher fluence on the shroud because it's
10	inside the vessel wall. So the limit on the shroud is
11	eight times to the 21st. And the limit on the vessel
12	is much less than that, but you're getting less
13	fluence out there. But I mean the limits are not the
14	same on both of them, but you could get to because
15	it's closer to the core, you're going to get to the
16	limit on the shroud before you get to the limit on the
17	vessel.
18	MEMBER ARMIJO: But is the shroud limit an
19	NRC limit or basically an economic issue that either
20	you're going to have cracked shroud or
21	MR. BETHAY: I guess it would be an
22	economic issue. The shroud itself just directs the
23	flow through the vessel
24	MEMBER ARMIJO: Right.
25	MR. BETHAY: and provides some support
	1

(202) 234-4433

	107
1	for the internals. But, you know, obviously if you
2	have to
3	MEMBER ARMIJO: It's a big economic issue.
4	MR. BETHAY: It's a huge economic issue.
5	MR. FORD: Well, but are also committed to
б	the BWRVIP requirements. Since the BWRVIP has this
7	requirement, we will meet it.
8	MEMBER SHACK: Well, at 8 times 21, this
9	would be brittle and it would be pretty susceptible to
10	cracking. And even hydrogen water chemistry isn't
11	going to save your butt.
12	MR. BETHAY: The point of this evaluation
13	was to show that in the extreme we still wouldn't
14	reach those levels because we haven't actually
15	performed those reg guide compliant calculations yet.
16	MEMBER ARMIJO: Do you have an
17	understanding of why your analyses don't match your
18	measurements.
19	MR. BETHAY: We have a number of theories
20	of why they don't match. We're still evaluating that.
21	We've got Tim and Ray and a team of folks trying to
22	ascertain that to see why this big gap in inability to
23	benchmark the data. That's basically the plan that I
24	talked about that we would submit to the Staff to
25	review, is how are we going to reconcile this and

(202) 234-4433
	108
1	what's the cause of it.
2	Today I can't explain why the gap. And
3	that's why we've done this very limiting evaluation to
4	say even with this gap, we know we've got substantial
5	room on the fluence for the vessel.
6	MEMBER ABDEL-KHALIK: Could you give us an
7	idea about the extent of that discrepancy? Is it a
8	factor of two, a factor of ten?
9	MR. BETHAY: Ray or Tim, maybe
10	MR. PACE: Yes. There is a bias that's
11	.56, and that works out to a multiplier or a factor of
12	1.78. So it's substantial.
13	Presently the P-T curves that we have are
14	based on a capsule pull. So they essentially have that
15	factor worked into them. So in the future what we
16	hope to do as we run through our plan is determine the
17	cause for that bias and have resolved it so that our
18	calculated and our measured values represented here.
19	CHAIRMAN MAYNARD: Is this potentially a
20	generic issue or is this specific to Pilgrim>
21	MR. BETHAY: I think we're probably the
22	first BWR3 that's run into this issue. One of the ways
23	that we may be able to resolve this, you know maybe we
24	have some oddity in our vessel or oddity in our
25	surveillance capsules. We'd look to benchmark another

(202) 234-4433

	109
1	BWR3 of similar construction and similar metallurgy.
2	MEMBER SHACK: But do all the BWR3s use
3	the same fluence calculation technology?
4	MR. BETHAY: I'll have to ask Tim.
5	MR. PACE: This is Ray Pace.
6	Many of the BWRs are using the same
7	fluence calculation methodology. It's the RAMA code.
8	And they are getting reasonable benchmarks. They're
9	meeting the Reg. Guide 1.190 requirements. We happen
10	to be the first BWR3 to use the RAMA code. But the 4s,
11	5s and I think one or two 6s have used it and they've
12	come out within an acceptable bias. For some reason
13	we're not. And being the first 3, there's not a lot
14	of data behind us that we can pull from others. We
15	are looking at other plant data that's similar plants
16	to us. And we hope that as we look at that, we'll gain
17	a better understanding of why we are seeing such a
18	significant bias.
19	MR. FORD: This is Bryan Ford.
20	There is a couple of other 3s that are
21	working on developing new curves using the RAMA code.
22	So one of the ways this may be resolved for us is some
23	other plants going down the path and resolving the
24	dosimetry discrepancy. They just haven't gotten there
25	yet.
	I

(202) 234-4433

I	110
1	MEMBER WALLIS: Is your shroud cracked?
2	MR. BETHAY: We implemented the preemptive
3	shroud repair.
4	MEMBER WALLIS: Yes, that's what you said
5	earlier. Right.
6	MR. BETHAY: Right. And that repair was
7	done in the late '90s, I forget the exact date.
8	MEMBER WALLIS: This is the thing where
9	you have sort of
10	MR. BETHAY: That's correct. There's four
11	tie rods
12	MEMBER WALLIS: rods. Right.
13	MR. BETHAY: that grip over the top of
14	the shroud and they're tied to the gussets on the flex
15	shroud support plate at the bottom.
16	MEMBER WALLIS: Well, was it cracked at
17	that time or is cracked now?
18	MR. BETHAY: The shroud?
19	MEMBER WALLIS: Yes.
20	MR. BETHAY: We made the presumption that
21	all of the horizontal welds were fully cracked. And
22	the tie rod design, the four rods were put in our
23	structural replacement for the H-1 through 9 welds, I
24	believe, on the shroud.
25	MEMBER SHACK: But does having the tie rod
l	I

(202) 234-4433

	111
1	get you out of an inspection
2	MR. BETHAY: That's correct.
3	MEMBER SHACK: Okay. So you don't really
4	know whether it's cracked or not.
5	MR. BETHAY: That's correct. The design
6	assumption
7	MEMBER SHACK: The design assumption is
8	it's fully cracked.
9	MR. BETHAY: Right. And then just as
10	another point on that, you may be aware there has been
11	industry experience
12	MEMBER WALLIS: Well, cracked means it
13	would fall off if you undid the tie rods?
14	MR. BETHAY: No.
15	MEMBER ARMIJO: Yes, you could disassemble
16	it.
17	MR. BETHAY: I suppose if all the welds
18	were all cracked, it would
19	MEMBER SHACK: That's the presumption at
20	any rate.
21	MR. BETHAY: Yes. There has been industry
22	experience recently, though, at another, a similar
23	plant where they found some cracking in the upper
24	connecting hooks, I'll call them, of the tie rod
25	repaired. We're a similar design. The stress levels
1	I

```
(202) 234-4433
```

	112
1	in our upper tie rod connecting pieces were similar
2	levels of stress. So this upcoming outage that begins
3	Friday, as I said, we're going to go in and
4	preemptively replace that upper portion of the tie rod
5	repair to change a couple of sharp corners. It had
6	significant stress risers, to more rounded corners to
7	reduce the applied stress on those hooks.
8	It'll perform the same function. It's
9	essentially the same design. It relieves a
10	potentially overstressed condition in there.
11	So if we move on here to slide 69.
12	So our future actions, as we've been
13	discussing, is that we will benchmark our computer
14	code using Pilgrim or other BWR3 dosimetry data as
15	we're able to retrieve it. As I mentioned, we have a
16	commitment to submit that action plan to the Staff for
17	review by September of this year. And we've also
18	agreed to a license condition to submit these
19	calculations that fully comply with Reg. Guide 1.19
20	prior to startup from the 18th refueling outage, which
21	will be in 2011.
22	MEMBER ARMIJO: What do you mean by
23	benchmark?
24	MR. BETHAY: Is there a technical
25	explanation, Tim or Ray?
I	1 I I I I I I I I I I I I I I I I I I I

(202) 234-4433

	113
1	MR. PACE: Yes. This is Ray Pace.
2	The benchmark is just the dosimetry or
3	some other means to demonstrate that the calculated
4	value that's coming out of the RAMA code for us
5	matches the value that we're actually measuring. So
6	it's a calculated measure.
7	MEMBER ARMIJO: But now these two values
8	are not the same?
9	MR. PACE: Right now the two values are
10	not the same.
11	MEMBER ARMIJO: So how are you going to
12	get them to be the same?
13	MR. PACE: One thing that we might do, and
14	we're considering on doing, is pulling another capsule
15	next outage which has dosimetry in it. And it's in a
16	different location in the vessel. So we would be able
17	to look at that data and it would give us a second
18	data point. Understand that we only have one real
19	data point right now, which was a capsule pulled in RF
20	04. We're coming up to RF 016, so it was quite a
21	while ago. So a more recent capsule would give us
22	better information because it's been in the plant for
23	the duration. So that would be one means of obtaining
24	a benchmark.
25	The reg guide also allows us to look at
l	

(202) 234-4433

1 other similar plant data. And there is a plant that's 2 a sister plant of ours. And we will likely look at two 3 capsules that were pulled from that plant to see if 4 that helps us understand why the one capsule we have 5 has a bias in it. We've done a root cause analysis to try to 6 7 determine the cause for the bias. We used the Traygo 8 methodology to do the root cause analysis and it did

10 looking. But we're confident we'll have a plan together by September that will describe exactly what 11 12 the steps are that we're going through to solve the 13 problem.

not come up with a definitive answer. So we're still

14 MEMBER ARMIJO: But I quess you're 15 essentially collecting more data and there is no guarantee, a priori, whether or not you're going to 16 17 get better agreement when you do the comparison with 18 the other samples?

19 MR. PACE: That's correct.

MEMBER ARMIJO: So --

21 MR. PACE: We can't be a 100 percent 22 confident that at this point in time to be able to 23 come up with a reasonable why the original capsule --24 MEMBER ARMIJO: And you're not implying 25 that the original measurement from the original sample

> **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

9

20

	115
1	is erroneous?
2	MR. PACE: We're not implying that at this
3	time. We've actually saved that piece of dosimetry and
4	actually recounted that dosimetry and it came out very
5	close to the first
6	MEMBER ARMIJO: And at the same time
7	you're not implying that the physics in the computer
8	code is incorrect?
9	MR. PACE: That's correct.
10	MEMBER ARMIJO: It could be, somewhere.
11	Something's wrong.
12	MR. PACE: Yes. And there are a number of
13	things you can look at. We can look at our power
14	history to make sure that our power history is
15	correct. There is a tremendous amount of data or input
16	data that goes into this program. So we would,
17	obviously, go back and look at all the input data to
18	the program to make sure that's all correct. And it's
19	going to be a very, very large parameter. It's going
20	to take quite a while for us
21	MEMBER BONACA: So you have to have a
22	solution by 2010?
23	MR. PACE: We have to have a solution by
24	2010.
25	CHAIRMAN MAYNARD: And right now you're
	NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 (202) 234-4433

	116
1	using the conservative number of the two?
2	MR. PACE: Yes.
3	MR. BETHAY: That's correct.
4	CHAIRMAN MAYNARD: So you're being
5	conservative now, but it's a current operational issue
б	as well as a license renewal so it's going to have to
7	be resolved prior to the period of extended operation?
8	MR. PACE: That's correct.
9	MEMBER SHACK: It has to be resolved by
10	the time you get to your end of your current P-T
11	limits?
12	MR. PACE: By the time we get to
13	MR. BETHAY: Yes. You know, the fact is
14	that if we don't reach a satisfactory resolution, then
15	we can't start up from our RF 019 in 2011. So a great
16	incentive to figure this out.
17	MEMBER ARMIJO: You're motivated.
18	MEMBER SHACK: Yes, you're motivated.
19	MR. BETHAY: Well, I suppose if there are
20	no other
21	MEMBER ABDEL-KHALIK: Let's just hold up
22	a little bit.
23	What do you expect at the end of this
24	benchmarking process?
25	MR. PACE: I expect we will find some
I	I

```
(202) 234-4433
```

	117
1	additional data either through our own capsule pull
2	next outage or from other plant data that will
3	benchmark against the RAMA code for us. And that we'll
4	be able to determine what happened based on that
5	data benchmarking, we'll be able to determine what
6	happened with that cycle 4 capsule and why there's a
7	difference that we see.
8	MEMBER ABDEL-KHALIK: So you know, in a
9	big picture then you'll either find out that the data
10	from that one sample is wrong or the code is wrong?
11	MR. PACE: That's correct.
12	MEMBER ABDEL-KHALIK: And what would you
13	do in these two scenarios?
14	MR. PACE: We'll make the appropriate
15	adjustments. We'll have the experts that have the RAMA
16	code make the adjustments to the RAMA code or the
17	input data or the power history, whatever that might
18	be, and rerun it. And demonstrate that we do in fact
19	have agreement with the capsule of the RAMA code is
20	wrong. And that will, of course, be reviewed by the
21	NRC because this code's been reviewed and approved for
22	use by the NRC. Or, if it happens to be a capsule
23	problem, we will identify it through the use of
24	additional data that we gain either from our capsule
25	pull or other plants that are similar to us. And then

(202) 234-4433

	118
1	we'll be able to demonstrate that it's a capsule
2	problem and why that problem exists.
3	There are some theories about why that
4	problems exists. And we would put those theories on
5	the table, if that is the case.
б	CHAIRMAN MAYNARD: It would appear to be
7	that you're definitely in regulatory space. So no
8	matter what you do, it's something that you're going
9	to have to come back to the NRC
10	MR. BETHAY: Absolutely.
11	CHAIRMAN MAYNARD: their review and
12	approval on? It's not something you can do in house,
13	right?
14	MR. PACE: Absolutely.
15	MR. BETHAY: We'll have to submit a tech
16	spec amendment request prior to start up from RF 018
17	that the Staff that will have to review and approve.
18	And if they don't find a sound basis to review and
19	approve it, then obviously they won't.
20	MEMBER BONACA: I have a couple of
21	questions regarding the BWR vessel integrity program
22	from a different issue.
23	The BWR vessel integrity program I believe
24	B.1.8. You have to exceptions. One is 3 and 4. And
25	they are exceptions to do with the BWRVIP-18, which

(202) 234-4433

	119
1	means you cannot well there are inaccessible welds
2	inside the core spray and I believe there are some
3	inaccessible welds in the jet pump assembly. And
4	you're unable to inspect yet these welds because of
5	the location where they are. And the statement is
6	that you will not be able to be inspect these welds
7	until UT delivery system is developed. And apparently
8	and EPRI and GE center is developing this technology?
9	In reading this I was left with a question
10	of when? I mean, you know, BWRVIP-18 has been in
11	place for quite a while. A requirement is there for
12	inspection. You cannot inspect it so you're taking an
13	exception. And I was left hanging there with when
14	will this happen.
15	MR. PACE: That's basically up to the
16	BWRVIP to determine an appropriate priority for
17	developing the inspection tools that are required.
18	And, of course, we as utilities will feed input to the
19	VIP.
20	MEMBER BONACA: Yes. I imagine that you're
21	not the only utility with a BWR in the same situation.
22	I mean, here you have a BWRVIP-18 that's supposed to
23	bring a solution to an issue. But it cannot be
24	implemented because there is no technology to
25	implement to do what it's supposed to do.

(202) 234-4433

(202) 234-4433

	120
1	MR. PACE: Right.
2	MEMBER BONACA: And there's an open ended
3	statement there in the SER that says they'll inspect
4	when the technology is available. Well, what happens
5	if technology is available 20 from now? Will you go
6	for 20 years without inspections or
7	MR. GRIESBACH: I'm not familiar with that
8	particular statement. But for Pilgrim and other
9	plants, they've taken exception to inspecting those
10	areas that are inaccessible through other analyses.
11	Through probabilistic fraction mechanics analyses that
12	shows the risk of failure of those welds is within
13	acceptable limits. And those analyses have to be
14	redone for higher fluence levels when the toughness
15	changes. So you can continue to do analysis instead of
16	those inspections.
17	MEMBER BONACA: Okay. So
18	MR. GRIESBACH: And I think credit is
19	being taken for that, for these analyses.
20	MEMBER BONACA: I mean in the inspection
21	report from the audit report, actually, you know it
22	leaves it hanging there that says they'll inspect it
23	when the technology will be available. And you're
24	saying now that this alternative is available to you
25	indefinitely until the end of the
	1

(202) 234-4433

	121
1	MR. GRIESBACH: If the criteria for the
2	weld failure probability of those regions can be shown
3	to be within acceptable limits, then you can continue
4	to not inspect those welds.
5	MEMBER BONACA: Yes, I'm done.
6	CHAIRMAN MAYNARD: Before lunch, I misled.
7	I said we had an hour, we actually have a half hour
8	scheduled for you after lunch here.
9	Are there any other questions, though
10	MEMBER BONACA: I have one more question.
11	CHAIRMAN MAYNARD: Okay. Go ahead, Mario.
12	MEMBER BONACA: The other question has to
13	do with the inaccessible medium voltage cables. You
14	know, that was inspected and you have a problem, which
15	is acceptable apparently. And the question came up
16	regarding testing of the service water cables, which
17	are 480 volts. And the answer to that was that's not
18	a medium voltage cable because the voltage is too low.
19	So I was left hanging there with a
20	question in mind what do you do about the service
21	water inaccessible power cable? Do you ever inspect
22	that?
23	MR. BETHAY: Alan, do you want to mention
24	that or
25	MR. COX: This is Alan Cox.

(202) 234-4433

	122
1	Of course, we inspect the same type of
2	cable in other applications, the same voltage level.
3	We would inspect the accessible portion of that cable.
4	MEMBER BONACA: Well how do you infer the
5	conditions of the cable since it is inaccessible, I
6	mean
7	MR. COX: Well, I guess, we would infer
8	from the inspections at the other locations, I think
9	the industry data that we've looked at that backs up
10	this program has not identified that voltage level as
11	being susceptible to the water treating issue that
12	requires a special program for the other cable.
13	MEMBER BONACA: Okay. Again, this is an
14	issue where maybe I should Staff. Because, you know,
15	you read it and you're left hanging with a question of
16	what about that. Now, that may be the issue that that
17	voltage level you're not susceptible to treat.
18	MR. COX: Right.
19	MR. NGUYEN: My name Duc Nguyen from the
20	License Renewal Branch.
21	The question with the low voltage in an
22	inaccessible cable, what we do with it. Right now for
23	the GALL we define the medium voltage, the to 235
24	kilowatt. So at the Pilgrim, they have program right
25	now that it will test the cable. However, to address
	1

(202) 234-4433

	123
1	the concern, the Staff also issued a generic letter
2	request all the licensee to address the low voltage
3	cable inaccessible. And based on that information the
4	Staff will require some kind of surveillance. And that
5	will carry over to license renewal period that is part
6	of the current licensing basis. And we will carry
7	over.
8	So that vehicle that we want to use
9	because if we challenge the applicant based on GALL,
10	they say why you require to rely on GALL
11	recommendation.
12	So to answer your question, yes, we
13	already issued generic letter to cover that.
14	MEMBER BONACA: All right. Thank you.
15	I have no further questions.
16	CHAIRMAN MAYNARD: John, I think you had
17	a couple of questions.
18	MR. BARTON: Yes, I've got a couple of
19	questions.
20	In the audit report there's some
21	discussion on aluminum and in outdoor environments.
22	And the conclusion in the audit report was that
23	aluminum exposed to outdoor air environment doesn't
24	have any applicable aging effects. Now I got a
25	problem with that. Since you guys are on salt water,
	1

(202) 234-4433

	124
1	I don't know how much aluminum you've got outside, but
2	I understand how you can conclude that there's no
3	aging effects with external aluminum exposed to salt
4	air environments.
5	And a related question to that one, is
6	some in the LRA in your application where you state
7	that salt deposits on high voltage insulators are not
8	an aging mechanism.
9	It seems to me I remember a while back
10	when you guys had a plant trip or something due to
11	salt buildup in your switchyard, and I'm sure you have
12	some aluminum components in the switchyard. Why
13	aren't these things a concern and why aren't there any
14	aging management in aluminum at the site that's
15	exposed to a salt environment.
16	MR. BETHAY: We can break that into two
17	pieces. Maybe, Bryan, do you want to take the first
18	piece and Brian Sullivan the second piece of that.
19	MR. FORD: The specific question on the
20	aging management programs. You were in the mechanical
21	section. There's only one mechanical component that's
22	made out of aluminum that's exposed to outside air.
23	That is the exhaust silencer on the station blackout
24	diesel generator, which is located over in the
25	switchyard on the land side of the plant. And, yes,
	1

(202) 234-4433

	125
1	we do have other aluminum components in the area and
2	we are not experiencing severe degradation that would
3	effect the structural integrity of it. So it's one
4	component, it's literally an exhaust silencer for the
5	diesel.
6	MR. BETHAY: Brian on the
7	MR. SULLIVAN: The insulators in the
8	switchyard have all been replaced. They've been
9	coated with silguard and we haven't experienced a
10	plant trip in a number of years related to salt
11	deposits on the insulators. And we've had a very
12	aggressive repair and preventative maintenance program
13	ongoing in our switchyard to reduce switchyard related
14	events. Since we embarked in that program, we've not
15	lost power due to a switchyard related event.
16	MR. COX: This is Alan Cox.
17	One thing I might add to what Brian said,
18	the salt on the insulators in the switchyard typically
19	those are I think you actually called it an event,
20	and that's the way we consider it for license renewal.
21	If you have the right weather conditions, you can have
22	that event occur in a matter of hours or days. It's
23	not an aging effect, per se. It's more of an event
24	that's based on those conditions.
25	MR. BARTON: Unless you don't take care of

	126
1	it and it builds up over a long period of time?
2	MR. COX: Right. But, you know, we
3	haven't seen the history of that over a long period of
4	time. It's typically been associated with events and
5	weather conditions like that that create conditions
6	are conducive to that.
7	MR. SULLIVAN: Technology has advanced and
8	now we have our corona cameras that we monitor the
9	switchyard with. When operators make rounds of the
10	switchyard, if they hit a cracking that's the first
11	sign that you have a problem; debris on your
12	insulators. We'll go out with a corona camera,
13	identify the specific
14	MR. BARTON: That responds.
15	MR. SULLIVAN: That's correct. And we'll
16	go and clean them.
17	MR. COX: Yes. A lot of those activities
18	are initiated independent of license renewal because
19	they have been problems under the current
20	MR. BARTON: Okay. I understand. Fine.
21	I have another one. In several
22	applications that and this has been an issue that
23	goes back to when NRC first asked a question about
24	fuse holders. I've seen a lot of applicants come in
25	and say that they will have a program to monitor fuse
1	I contraction of the second

(202) 234-4433

	127
1	holders. And in your LRA you say that fuse holders
2	are an active device. Please explain to me how the
3	clips on a fuse are active devices. I don't understand
4	that.
5	MR. COX: Let me try it, and then I may
6	let Brian finish up on the end of that.
7	But for license renewal the scope of the
8	fuse holder program in GALL, the E5 program actually
9	says the supply to fuse holders that are outside of
10	active devices. And the thought behind that is if the
11	fuse holders that are in the switch gear, in the motor
12	control center cabinet or control panel are
13	maintained, inspected, I think in some cases actually
14	check the tension on these spring clips as part of the
15	normal maintenance of that active assembly. So for
16	fuse holders, what we did for license renewal, we
17	looked for fuse holders that were not included in
18	those active devices, such as switch gear. And if
19	there were any, and I don't know how many there were,
20	but we looked at the intended function of those that
21	are outside of those active license and found that
22	they weren't associated with intended function for
23	license renewal. And we didn't need to be subject to
24	aging management review for that purpose.
25	MR. NGUYEN: Again, my name Duc Nguyan.

(202) 234-4433

	128
1	Maybe I can add some value to the
2	applicant's statement. Because, you know, I am the
3	auditor at the Pilgrim for electrical.
4	The fuse and the fuse holder, the fuse is
5	active device because when it function, it can the
6	question with the fuse holder is a passive long live
7	device.
8	The Staff identify this issue in back in
9	2001. And we issued the in the interim staff
10	guidance 5. In there we specified any fuse that
11	belong to the recovery active assembly and under the
12	54.21 rule, it inside active assembly, it is
13	considered active. So it's not required aging
14	management review.
15	The only fuse holder outside the active
16	assembly by a fuse panel, because, see, require aging
17	management review.
18	Most of the fuse inside either MCC, mobile
19	control center power supply. Very few case the
20	outside. And it depend on design of the plant.
21	In Pilgrim they are either outside
22	inside the active assembly or they did not perform the
23	licensing function. And this is consistent with
24	interim staff guidance number 5 that was issued to
25	applicant. And we conclude that because they didn't
I	

(202) 234-4433

	129
1	have none on outside active assembly, then they are
2	not required aging management review.
3	MR. BARTON: Thank you.
4	I got one more. Also on your LRA you're
5	talking about a condensate storage tank and diesel
6	fuel tank. You described their foundations. But also
7	in there you talk about that they sit on sand beds.
8	And have you ever inspected the bottoms of these
9	tanks>
10	In the LRA you're proposing a one time
11	random ultrasonic test of the bottoms. How do you know
12	that that's going to be adequate? How do you know
13	there's no corrosion, degradation going on on the
14	bottoms of those tanks after all these years sitting
15	on a sand bed?
16	MR. COX: This is Alan Cox.
17	The condensate storage tank does have the
18	one UT inspection. But in addition, it has a visual
19	inspection on a periodic basis as part of our periodic
20	surveillance and permanent maintenance review.
21	MR. BARTON: That's going inside the tank
22	and looking?
23	MR. COX: Right. Right. So that the UT
24	is a confirmatory. You know if we see indications on
25	the visual inspections of rust or corrosion from the
I	

(202) 234-4433

	130
1	outside, we would look at it.
2	MR. BARTON: Would you expect to go in a
3	tank and look at the bottom, would you expect to see
4	what is the tank made of? Is it carbon steel or
5	aluminum?
6	MR. COX: I think carbon steel.
7	MR. BETHAY: Coated. It's lined inside.
8	MR. BARTON: It's lined inside? All
9	right. Then you haven't done any inspection of the
10	lining?
11	MR. COX: We've gone into one of them a
12	couple of years ago. I forget the
13	MR. FORD: This is Bryan Ford.
14	I believe we've went into both of them.
15	We're planning a tank relining in 2008 of both tanks.
16	MR. BARTON: Of both tanks?
17	MR. FORD: And during that time we were
18	planning on doing the UT of the bottoms of the tanks.
19	MR. BARTON: Okay. I'd be satisfied with
20	that.
21	MEMBER BONACA: Since you are talking
22	about tanks. I was reading they are diesel?
23	MR. COX: The diesel tanks.
24	MEMBER BONACA: You define diesel tank at
25	T.107.A you found leaking in 2001. And you're
1	

```
(202) 234-4433
```

131 1 monitoring the leakage and you will repair at some 2 point in the future. When are you going to repair it? 3 I mean, six years ago? 4 MR. BETHAY: Do you have the tank, the 5 number? 6 MEMBER BONACA: Yes. It's T.107.A. Ι 7 mean I was surprised by, you know, looking at this in 8 your operating experience description. And it seems 9 like to monitor a leakage. 10 MR. BETHAY: Bryan and I were just discussing. We think that's a fire water storage tank 11 12 that has been repaired. MEMBER BONACA: That's the fire water 13 14 storage tank. 15 MR. BETHAY: Yes. 16 MEMBER BONACA: 107.A. MR. BETHAY: I believe that has been 17 repaired, but let us verify that. 18 19 CHAIRMAN MAYNARD: What we could do if you 20 could, when the Staff's up here, maybe have somebody 21 check on that. 22 MR. BETHAY: We'll do that. 23 CHAIRMAN MAYNARD: And perhaps get it by 24 the end of the meeting. 25 MR. COX: I did want to say one more thing

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

	132
1	about the Mr. Barton asked about the fuel tanks. We
2	do have two fuel tanks that also sit on a sand
3	cushion. And they are subject to periodic inspections
4	and UT of the tank bottom surface under the diesel
5	fuel monitoring programming.
6	MR. BARTON: And you do it more than a one
7	time?
8	MR. COX: Right.
9	MR. BARTON: Okay. Fine. That's
10	excellent.
11	CHAIRMAN MAYNARD: Said?
12	MEMBER ABDEL-KHALIK: Have you had any
13	leaks inside the containment from things like recirc
14	pump seals?
15	MR. BETHAY: We've had leakage inside the
16	primary containment, yes sir, from packing leaks. I
17	don't recall from recirc pump seals offhand, but
18	certainly packing leaks and other such leakage inside
19	the containment.
20	MEMBER ABDEL-KHALIK: So is there a curve
21	around the edge of the floor inside the containment
22	between the floor and the steel or is it just butted
23	against the steel
24	MR. BETHAY: It's just flat. I know some
25	designs have a fairly large curve that comes up the

(202) 234-4433

	133
1	side. Ours does not have that curve.
2	MEMBER ABDEL-KHALIK: Were some of these
3	leaks at sometime in the past significant enough that
4	water may have seeped between the concrete floor and
5	the inside surface of the containment?
6	MR. BETHAY: That's why we don't
7	believe so, but that's why we do the confirmatory
8	measurements that we've done and that we propose in
9	the future right at the surface and an inch down.
10	MEMBER ABDEL-KHALIK: Now how would you do
11	that? How would you confirm that you don't have any
12	water between the concrete and the
13	MR. BETHAY: Well, we do the UT for
14	evidence of degradation.
15	MEMBER ABDEL-KHALIK: So there is no way
16	for the water to sort of penetrate below the depth
17	that which you're going to do the UT?
18	MR. BETHAY: I don't believe so. Unless
19	mechanistically that would happen.
20	MEMBER ABDEL-KHALIK: So there is direct
21	intimate contact between the concrete and the steel
22	over the entire surface
23	MR. SMITH: IT's embedded.
24	MEMBER ABDEL-KHALIK: of that area on
25	the inside surface of the containment?

(202) 234-4433

	134
1	MR. BETHAY: That's correct. Yes.
2	MR. SULLIVAN: And that the surface is
3	coated with a coating to protect it above where the
4	concrete meets up to it.
5	MR. BETHAY: Gary Dyckman.
б	MR. DYCKMAN: I'm Gary Dyckman.
7	Inside the drywell the elevation 9 foot is
8	concrete poured against the concrete shell. And what
9	we did for evaluating the potential for any corrosion
10	if water were to get into that joint was to chip away
11	the concrete, perform the UT inspection. And the
12	logic behind that examination was that if water had
13	gotten into that joint that you would find evidence of
14	degradation in the upper layer where we chipped down
15	and did the UT.
16	MEMBER ABDEL-KHALIK: But if the water can
17	penetrate much farther down, it may be closer to the
18	bottom of that light bulb.
19	MR. DYCKMAN: Well, it's certainly
20	possible that that could do that. It would seem
21	unlikely. There is a joint at the top. The concrete is
22	bonded to the liner. It would seem unlikely to us that
23	that would happen. But right at the top where the
24	joint is if water penetrated there, we would have
25	expected to find some evidence of degradation. That
	1

(202) 234-4433

	135
1	was the approach that we took.
2	MEMBER ABDEL-KHALIK: Thank you.
3	MEMBER BONACA: I have just one more
4	question regarding the torus. Reading material on the
5	audit, again, the comment is made that that in several
6	location, the thickness, the wall thickness of the
7	torus is below nominal, although still in excess of
8	minimal requirements. Where is this coming from? Is
9	it the original design of the torus that was that way
10	and the wall has always been that way or is it the
11	result of some corrosion taking place?
12	MR. BETHAY: Ray.
13	MR. PACE: This is Ray Pace.
14	I can answer that. Inside the torus most
15	of the problems that we have are below the water
16	level.
17	MEMBER BONACA: Yes.
18	MR. PACE: And really at the water level
19	is where we have the most problems where the surface
20	gets wetted. It is coated. It's a zinc-rich coating.
21	And after time some of the zinc gets depleted in some
22	local areas and then we get local corrosion. We have
23	to go in on a regular basis and we inspect the torus
24	pretty much every other outage right now we have a
25	coat inspectionist come in and we reapply coating over

(202) 234-4433

	136
1	those locations after we measure to make sure that
2	we're still well above minimal wall requirements.
3	MEMBER BONACA: So you do have an active
4	program to assure that you don't go any further below?
5	MR. PACE: Yes, we do.
б	MEMBER BONACA: I mean, because right now
7	you're claiming that in all locations that you have
8	measured you have excess margin with respect to the
9	minimum code criteria.
10	MR. PACE: Yes, sir.
11	MEMBER BONACA: But certainly you don't
12	want to have progression erosion of that?
13	MR. PACE: Right. And that's why we go in
14	every other outage and we restore the coating.
15	MEMBER BONACA: You're doing monitoring in
16	the same locations, for example where you measure
17	are you measuring the same locations where you'd found
18	minimum thicknesses?
19	MR. PACE: What we're doing is we're
20	restoring the coating so then at that location we have
21	no more corrosion because we have the zinc-rich
22	coating on it. And we also look for other locations
23	that need to be repaired.
24	MEMBER BONACA: So you don't go back to
25	the same location where you found minimum thicknesses?

(202) 234-4433

	137
1	MR. PACE: Not necessarily.
2	MEMBER BONACA: Not necessarily. How do
3	you know that in the process of, you know, the fact
4	that you lost your coating and you're restoring it now
5	that you haven't lost further margin in thickness?
6	MR. PACE: The corrosion is very visible
7	and the coating that would remain with the application
8	of the new coating, we'd just look at it and just tell
9	that the coating is standing up and there are no
10	problems with this
11	MEMBER BONACA: Now is this a specific
12	program you have? Is this a license renewal program
13	or is this
14	MR. BETHAY: This is age old ongoing
15	MEMBER BONACA: That's an ongoing
16	MR. BETHAY: Is it IWE that dictates that?
17	MR. PACE: It is part of IWE.
18	MEMBER BONACA: IWE. Okay.
19	MR. PACE: It's primary containment.
20	MEMBER BONACA: Yes. Okay. And do you
21	have sister plants there that you are comparing this
22	experience with their margin?
23	MR. PACE: That's right. We compare with
24	Fitzpatrick mostly because their coating is the same
25	vintage as ours and we're constantly sharing data to

(202) 234-4433

	138
1	make sure that we're maintaining the coating
2	appropriately.
3	MEMBER BONACA: Okay. Thank you.
4	CHAIRMAN MAYNARD: We need to be moving on
5	to the Staff presentation.
6	We'll have another shot. This is a
7	Subcommittee meeting. At the end we'll kind of go
8	through and if there's any still open questions,
9	whatever, that can be answered right away, we'll
10	include those when we have a full Committee meeting.
11	So we'll have another chance to ask questions on these
12	subjects, too.
13	So unless somebody has a burning question,
14	I just can't hold back.
15	Thank you very much.
16	MR. BETHAY: Thank you for the
17	opportunity. Thank you very much.
18	CHAIRMAN MAYNARD: And we'll turn it over
19	to Perry.
20	And I think, from the agenda, you're
21	covering the right items. I do want to make sure we
22	leave some time at the end to discuss the open items
23	from the Staff's perspective. I know it's on your
24	agenda here, so we'll leave some time for that.
25	MR. BUCKBERG: Thanks.

(202) 234-4433

	139
1	I'll go through the script I wrote. The
2	introductions I made a little earlier.
3	My name is Perry Buckberg. I'm the
4	Project Manager for the Staff review of the program
5	license renewal.
6	Joining me today from Region I is Glenn
7	Meyer, the inspection team leader. Also joining me is
8	Dr. Jim Davis from NRR, who is the audit team leader.
9	And the technical staff is back over there, and
10	they've already spoken up a few times.
11	We'll be presenting the results of the
12	Staff's review.
13	I'll provide an overview of the plant and
14	the application followed by a discussion of the
15	scoping and screening results.
16	Glenn Meyer will discuss the results of
17	the license renewal inspections.
18	Dr. Davis will present the results of the
19	aging management review.
20	And I'll conclude with the TLAAs.
21	Displayed is some general information
22	regarding the plant and its license renewal. The
23	current operating license, as stated earlier, expires
24	in June of 2012.
25	A lot of this was covered earlier, so I'll
	1

(202) 234-4433

	140
1	flip through.
2	The SER with open items was issued just
3	over a month ago on March 1st. In addition to the
4	open items, the SER includes three license conditions.
5	They are just the standard three license conditions
6	for all approved plants. They've been repeated in each
7	license.
8	MEMBER WALLIS: Is there a small number of
9	RAIs compared with the usual?
10	MR. BUCKBERG: It's less than some of the
11	recent plants.
12	MEMBER WALLIS: It looks rather small,
13	yes.
14	MR. BUCKBERG: But there's some recent
15	RAIs where we discussed the torus and neutron fluence.
16	Continued discussions on those, which go back to one
17	RAI, you know the hours put into it.
18	CHAIRMAN MAYNARD: It's sometimes hard to
19	compare just numbers. It also depends on what the
20	RAIs are for.
21	DR. DAVIS: Also the audit team is taking
22	a lot more of the issues and so there are fewer RAIs
23	because there are less of other staff there.
24	MEMBER BONACA: So much as being on site,
25	right?
	I contract of the second se

(202) 234-4433

	141
1	MR. BUCKBERG: This slide shows the dates
2	of the audits and regional inspection for your
3	information.
4	During the scoping and screening
5	methodology audit, the audit team determined there
6	were no omissions of systems or structures within the
7	scope of license renewal. The Staff then concluded
8	there were no omissions following it review of Section
9	2.2.
10	Sixty mechanic systems were identified in
11	the application as being in scope, of which 100
12	percent were reviewed. The review of the security
13	diesel system became an open item. In addition there
14	were several components were brought into scope.
15	MEMBER BONACA: I had a question regarding
16	the audit. The audit is performed by the organization
17	that you're hiring to do the job, right?
18	DR. DAVIS: Yes. It was actually five
19	staff members and three contractors.
20	MEMBER BONACA: Okay. So it's a mixed
21	team.
22	DR. DAVIS: Mixed.
23	MEMBER BONACA: Okay. Thank you.
24	MR. BUCKBERG: The security diesel open
25	item was discussed a little earlier, and I'll

(202) 234-4433

	142
1	elaborate. The applicant included the security diesel
2	system in the scope of license renewal. There was
3	insufficient information in the application to verify
4	what is in scope. This issue was referred to the
5	regional inspector who verified the applicant's claim
б	on March 9th. That issue we consider settled at this
7	point.
8	MEMBER BONACA: On the issue of no,
9	this is the fire. Okay. I'll talk about it when we
10	get there.
11	MR. BARTON: And what was the issue here?
12	The inspection of the diesel fuel oil tank or
13	something like that?
14	MR. BUCKBERG: No. It was actually the
15	whole security diesel system. The physical location,
16	if there is any possibility for spatial interaction.
17	And since there were no drawings included, which was
18	mentioned a little earlier, we needed to dispatch
19	someone directly to the site. It was a formality that
20	I kind of overlooked. I thought there was a process in
21	place. I finally turned on the regional inspector
22	just before the SER was issued and we didn't get the
23	response in time. And we've closed it since.
24	MR. BARTON: Okay.
25	MR. BUCKBERG: Continuing with mechanical
	I contraction of the second seco

(202) 234-4433

	143
1	systems. All listed components were brought into
2	scope as a result of the Staff's review.
3	MEMBER WALLIS: Now presumably it's only
4	the casing of the turbocharger or something? It's not
5	active
6	MEMBER SHACK: It's not passive.
7	MEMBER WALLIS: The turbocharger is
8	active?
9	MR. BUCKBERG: It's an active
10	MEMBER WALLIS: It's just the casing with
11	the passive
12	MR. BUCKBERG: It's the casing and the
13	environment that were added in the scope.
14	MEMBER BONACA: You know, these issues for
15	example the emergency transfer skid has come back in
16	previous applications. Is the guidance clear enough?
17	I mean, why they didn't have it in scope? I mean why
18	did it take a review of the inspector to bring it in
19	scope? I thought that the guidance for this item is
20	very clear.
21	MR. BUCKBERG: These items were brought in
22	scope by the Staff, not by the inspectors.
23	MR. MARKS: This is Cliff Marks. I work
24	for ISO and I was the contractor on the scoping and
25	screening.

(202) 234-4433
	144
1	There are sometimes components that are
2	not intuitively obvious whether they should be in
3	scope or not. And when we performed our review, these
4	were identified as having an attended function and
5	should be managed. And in one case, the correct
6	environment in which it exists wasn't identified. And
7	this is what we came with.
8	MEMBER BONACA: All right. So it was not
9	that the guidance wasn't clear. It was more that it
10	was an item
11	MR. MARKS: No. The guidance I believe
12	was clear and during the review this was identified.
13	MEMBER BONACA: Okay.
14	MR. BUCKBERG: Thanks.
15	There are no omission of components within
16	the scope of license renewal for Sections 2.4, 2.5.
17	MR. BARTON: I had a question on 2.5.
18	Cable connections. Isn't there a question as to
19	whether cable connectors should be in scope or not?
20	License said no, they're active or something. Aren't
21	the cable connectors passive? I don't understand the
22	issue here.
23	MR. NGUYEN: My name is Duc Nguyen and I
24	am the responsible party over the electrical audit.
25	In application the applicants determined
	1

(202) 234-4433

	145
1	that the cable commission have no aging effect. Okay.
2	And we disagree with that statement. And because in
3	the GALL we state that cable connection can have the
4	aging due to corrosion, due to thermal expansion,
5	different material have different thermal expansion.
6	The loser the bolt connection is aging effect.
7	We stressed the concern with applicant and
8	through II the applicant submit the aging management
9	program. And the Staff review and find it acceptable.
10	So that issue is closed.
11	And we also addressed in the SER Sections
12	3.6.2.3. If you look at that, you will see the Staff
13	evaluation in detail.
14	MR. BUCKBERG: Thanks.
15	In conclusion, the Staff determined that
16	the applicant's scoping methodology meets the
17	requirements of 10 CFR 54.4
18	I'm going to introduce Glenn Meyer from
19	Region I who is going to discuss license renewal
20	inspections.
21	MR. MEYER: Good afternoon, Chairman
22	Maynard and Committee members. I'm Glenn Meyer and I
23	lead the regional inspection for license renewal at
24	Pilgrim. Richard Conte, the Branch Chief in Region 1
25	is joining me.
1	I contract of the second s

(202) 234-4433

	146
1	There were two objective for the
2	inspection. We looked at scoping regarding
3	54.4(a)(2). We also looked at the implementation of
4	the aging management programs.
5	Next.
6	MEMBER WALLIS: When you walked down, did
7	you look on the floor in the bays of the torus?
8	MR. MEYER: Absolutely. IT was our
9	inspection that identified that.
10	MEMBER WALLIS: Yes. Do you have anything
11	to say about what you saw which differs from what we
12	heard this morning?
13	MR. MEYER: No. It was our raising of the
14	issue that prompted the RAI and led to the actions to
15	address it.
16	CHAIRMAN MAYNARD: As far as the amount of
17	water or moisture, the way it was characterized is
18	pretty close to your characterization, too?
19	MR. MEYER: I would say so. I would say it
20	looks a little better in the slides today than it did
21	when we looked at it, but that's reasonable.
22	MEMBER SHACK: It dried up a little bit.
23	Did you talk to the resident inspector?
24	Was he aware of the water in the torus room? Is that
25	something that

(202) 234-4433

	147
1	MR. MEYER: I would have to say that water
2	in torus rooms is something that is not atypical,
3	having been a senior resident inspector. I mean, you
4	can see some evidence that there has been water in the
5	torus room. In this case where we were looking for
б	the monitoring of the drywell shell, and that was
7	potentially evidence that there had been evidence in
8	the inaccessible gap portion, it was particularly
9	important.
10	I don't know of any other sites that have
11	brought in experts to monitor the amount of water and
12	determine the depth of analyses that occurred here.
13	But it's not atypical.
14	MEMBER BONACA: A comment on the physical
15	conditions of the torus and really visually from the
16	pictures it looks in good shape.
17	MR. MEYER: I did not personally go in the
18	torus room, but from what the inspector said it was
19	typical of what you would see. There were some other
20	materials there that he felt inappropriate. There was
21	a corrective action I think initiated and it addressed
22	other issues in the torus room. But for the condition
23	of the equipment and the moisture, I wouldn't say it
24	was unusual.
25	MR. CONTE: I believe the licensee has

(202) 234-4433

148 1 the applicant has now has put bottles now, or 2 underneath those drains so that anything that comes 3 out of those drains will be collected in water bottles 4 and distinguish from the ground water on the floor 5 since the inspection. The audit team was very 6 DR. DAVIS: 7 surprised when we heard this news. Because we would have asked a number of questions about water in the 8 torus room because of the drywell shelf issue. 9 And we were under the understanding that there -- Dan and I 10 were under the understanding that it was dry. 11 Ι almost fell off my chair when I heard that there was 12

water on the torus room floor, and that's why there 13 14 were a lot of internal meetings and a lot of RAIs that 15 resulted as a result of this finding. It was thanks to the regional inspection got this information. 16

MEMBER SHACK: But those drains then 17 weren't feeding into a collection thing before? 18

19 MR. MEYER: I would say that our inspector 20 looked for -- these are referred to as buckets. 21 MEMBER SHACK: Buckets.

22 He looked for buckets. He MR. MEYER: 23 didn't identify what the buckets were. So it's open to 24 interpretation as to whether they existed before and 25 whether they were there.

> **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

	149
1	You know, he mentioned his observation.
2	Pilgrim believes that the buckets were there and had
3	been there. I don't know how we'd resolve that.
4	MR. FORD: This is Bryan Ford with
5	Entergy.
6	When you do a tour of the torus room
7	outside the radiation area and don't crawl on your
8	stomach underneath the torus, you can't see the
9	buckets that collect from these drains. So the
10	inspector when he was down there with his tour didn't
11	see them. The person who he was with hadn't seem them
12	himself. So he didn't know. When he raised the issue
13	in the inspection, we wrote a corrective action
14	document. We assigned somebody to go down there and
15	put buckets under them. He crawled under the torus,
16	found the buckets that were already there and labeled
17	saying "Do not remove." And he came back out with his
18	new buckets.
19	So the buckets have been there since 1987.
20	'87, I believe. We have twice every outage documented
21	that a V2R examine going in and looking to make sure
22	everything is dry.
23	MEMBER SHACK: Okay. That is documented?
24	MR. FORD: And in several cases they've
25	said in the buckets. You know, in some cases they
	1

(202) 234-4433

	150
1	just say it's dry, no evidence of leakage. But in a
2	few cases they say in the buckets.
3	The buckets were there when we went in and
4	crawled under the torus and looked.
5	And as Steve said, they showed no evidence
6	of previous watering.
7	MR. MEYER: In the scoping and screening
8	area, our inspection looks at non-safety systems,
9	structures and components whose failure could affect
10	safety systems, structures and components. Primarily
11	that involves spatial and structural interaction.
12	Spatial as in the vicinity and liquid could affect a
13	system. And structural non-safety related parts of
14	piping that are directly connected that could affect
15	the seismic design.
16	We reviewed drawings and program
17	procedures. We went in the field and looked at the
18	systems.
19	Are conclusion is that the spatial
20	interaction part was acceptable. They had taken a
21	conservative spaces approach and it did address all
22	the applicable SSEs. Nonetheless, in the structural
23	area we found that there were some incorrect
24	boundaries. They had made assumptions based on drawing
25	notations that they believed indicated the seismic

(202) 234-4433

	151
1	boundaries, but that was in fact true. So after
2	identifying that, they did reevaluate, added the
3	components that needed to be added and amended to the
4	application. And we did reinspect that area and
5	concluded that they had done a thorough job.
6	Next.
7	In the aging management area, as we've
8	discussed, one of the primary findings that we had was
9	concerning the drywell, the flow switch that had
10	failed and that had not been repaired, the water on
11	the torus floor and the inconclusive monitoring. I
12	think Entergy has addressed.
13	There were six other areas where we felt
14	there were concerned that Entergy addressed to our
15	satisfaction during the inspection. And they're
16	documented in the inspection report.
17	The typical approach was to look at the
18	programs, what they had done, records of and evidence
19	of effectiveness and walkdowns and discussions with
20	personnel.
21	MR. BARTON: Before you go off that slide.
22	In your inspection report you mentioned that several
23	of the programs that you talk about all the
24	programs you looked at. In several instances you said
25	that as a result of your looking at the programs, the
	I contract of the second s

(202) 234-4433

	152
1	applicant will expand and provide inspection
2	acceptance criteria in some of these programs. How
3	will you guys follow up and assure yourselves that
4	these things are done and that you're satisfied with
5	what they've done to their programs?
б	MR. MEYER: Okay. The inspection program
7	provides another round of inspections before the
8	period of extended operation. And although the
9	procedure is being it's in development. But, yes,
10	I firmly believe that as part of that inspection we'll
11	look at the report to see the issues that were
12	addressed, to look at other commitments and then
13	confirm that their actions have been acceptable.
14	MR. BARTON: Okay. Thank you.
15	MR. MEYER: Okay. So, next slide.
16	So inspection conclusions. We concluded
17	that the scoping area and the aging management
18	programs support a conclusion that aging effects will
19	be managed. The drywell shell monitoring has been
20	addressed under an SER open item.
21	And there was one other program that we
22	looked at that we didn't feel there was enough key
23	parameters or critical elements to reach a
24	determination. We call that a determinant. But I
25	think has been looked more thoroughly by the audit.
1	

(202) 234-4433

	153
1	So that's the conclusion of the
2	inspection.
3	From a regional perspective, I'd also like
4	to address current performance. Pilgrim Station is in
5	the licensee response column, which represents the
б	lowest level of regulatory interaction. That is based
7	on all their performance indicators being green and
8	all the findings also being green.
9	The end-of-cycle or annual assessment
10	letter did not establish any substance crosscutting
11	issues.
12	And we expect to do the baseline program
13	in the next period.
14	Performance indicators and findings.
15	That concludes my remarks. Any questions?
16	MR. BARTON: Yes. You did some plant
17	walkdowns. Did you walkdown with some of the system
18	engineers when you did some of the walkdowns?
19	MR. MEYER: I did not myself, but my team
20	members do.
21	MR. BARTON: You did.
22	MR. MEYER: Yes.
23	MR. BARTON: Well, has the team determined
24	that the the applicant takes credit for system
25	walkdowns or a system walkdown program and a

(202) 234-4433

preventative maintenance program. Do you feel comfortable that the system walkdown program is adequate or --

4 MR. MEYER: Yes. I believe that the system 5 walkdowns typically have been done in the last, say, ten years in response to the maintenance rule. And 6 7 they have developed to the point, and I think they are also planning to further develop to put more aging 8 9 management aspects into the program. But thus far we 10 felt that the systems engineers were knowledgeable and that they did a credible job when they have guidance, 11 12 and their application of that guidance has been satisfactory. And we believe that that leads to a 13 14 generally effective program of identifying problems in the field and addressing them. 15 16 MR. BARTON: Okay. 17 MEMBER BONACA: I had a question I would like your impressions. They have many problems with 18

19 exceptions. And typically, you know, those exceptions 20 have been acceptable to the NRC. For example, in the 21 fire protection program there are a lot of exceptions 22 regarding the frequency of inspections, the monitoring 23 or whatever activity.

24 Years ago we made some comments to the 25 Staff that in reviewing GALL, you know, we should

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

1

2

3

	155
1	probably eliminate some of the prescriptiveness of
2	GALL since a range of time, for example for
3	inspections, seems to be acceptable. Do you feel that
4	still GALL forces to a lot of prescriptive steps that
5	you have to evaluate individually to accept exceptions
6	or is there room for improvement still?
7	MR. MEYER: I think the question could be
8	better answered by Dr. Davis.
9	We look at the field implementation and
10	the exceptions and whether they are found to be
11	acceptable is pretty a foregone conclusion when we go
12	in.
13	MR. IQBAL: This is Naeem Iqbal from NRR.
14	The Pilgrim program is based on their
15	approved fire protection program that we reviewed in
16	1978 SER. The GALL recommendation are based on most
17	recent NFPA codes. When we review the license renewal
18	application we pull all the old SERs and review the
19	program.
20	So the GALL recommend like six month
21	versus the refueling cycle for the CO_2 system. So
22	there's a difference of like one year, but at that
23	time we approved it
24	MEMBER BONACA: The reason why I asked the
25	question is that we've always tried to improve the
	1

(202) 234-4433

	156
1	efficiency of the process. And if you have a lot of
2	exceptions that the licensee has to make because
3	you're prescribing six months and he has eight months,
4	then all you have to do is to say it and then the
5	exception is granted, then the best thing to do is
6	maybe provide them more latitude and so they'll have
7	less exceptions and yet you'll have an acceptable
8	MR. IQBAL: Yes. In some cases some of
9	the applicants they don't have those frequencies. So
10	we asked to enhance their program to follow the GALL.
11	DR. DAVIS: The frequency tend to follow
12	some type of a national standard.
13	CHAIRMAN MAYNARD: Could you state your
14	name for the record again?
15	MR. IQBAL: Naeem Iqbal.
16	MEMBER BONACA: I understand. You know,
17	but still GALL has a flexibility to include that.
18	And, you know, that would eliminate a need for the
19	licensee to make an exception.
20	DR. DAVIS: Right.
21	MR. CHANG: This is Ken Chang.
22	MEMBER BONACA: It would facilitate your
23	life because it's within the acceptable range and it's
24	easier to address.
25	MR. CHANG: I'd like to give that question
l	I

(202) 234-4433

	157
1	a little more general response.
2	In the 2005 GALL update SRP license
3	renewal update and generation of the basis document we
4	incorporate a lot of plan specific programs into GALL
5	programs. And also we eliminated some of the
6	exceptions being frequently used into the GALL. But
7	now since 2005, September or 2005 GALL already
8	issued, the next update of the GALL, we don't know
9	when. So in my License Renewal Branch we instituted
10	a collection of exceptions, plant-specific programs or
11	what we call thelet's say why frequently
12	encountered problems. We collect those. We asked the
13	team members to write up a smaller card, let's call a
14	cue card.
15	Jim Davis is a collection of all the cue
16	cards.
17	Until we update the GALL next time, all
18	the experience we learned, we collected in a central
19	location and people can use it.
20	Now my audit team members of this plant and
21	other plants can use it.
22	We plan to continue this process to take
23	care of those exceptions, enhancements so make it more
24	standard. At least we have a standard set of
25	questions and standards areas to look into it. That's
l	I contraction of the second

(202) 234-4433

	158
1	a goal. It may not be addressing your question that
2	fast, but we are in the direction.
3	MEMBER BONACA: I think this does. I think
4	it is the right thing to do.
5	DR. DAVIS: We'd identified a real strong
6	weakness in the GALL report in the last several
7	audits, and that is the code addition that you use.
8	Because when they go into a new interval within 12
9	months the applicant submits to the NRC which code
10	addition they're going to use. We put in the 2001 one
11	addition with the 2002 and 2003 addenda in GALL. And
12	nobody's using that yet.
13	MEMBER BONACA: Right.
14	DR. DAVIS: So everybody has to have an
15	exception. So we made a big mistake, and I was the
16	one that's did it. So I'm the one but in the future
17	we've got to address that so that we're not everybody
18	take an exception.
19	MEMBER BONACA: Yes. Right.
20	DR. DAVIS: And there's an easy way to
21	take care of it.
22	MS. LUND: This is Louise Lund.
23	I can't resist putting on management's
24	spin on it as well. We also look at we don't have
25	a schedule for updating the GALL at a regular interval
	1

(202) 234-4433

1 inasmuch as we have to weigh, you know, the benefit 2 with the amount of resources. Because it a hugely 3 resource intensive effort when we do upgrade the GALL. 4 But as Ken Chang was just saying, you know, we do 5 recognize that there are improvements that can be made 6 and we do tend to track those. So when we get the 7 opportunity to and it looks like the balance between 8 putting the resources towards as versus the benefit, 9 it would be good that we are staged and ready to do 10 that. Right. Thank you. 11 MEMBER BONACA: 12 MR. CHANG: And I have to say that we are better off on BWRs than in PWRs. Because in the last 13 14 four audits it's all BWRs. So those consistent 15 experience that we're trying to collect is there. 16 Now we start to audit some PWRs, we do 17 likewise. So we have PWR experience, we have BWR Hopefully my life will be easier. 18 experience. 19 MR. BUCKBERG: I was going to introduce 20 Dr. Davis will discuss the safety audit. you. 21 DR. DAVIS: This next slide might a little 22 confusing. It was confusing to me. Because when we 23 were at the audit we had 13 programs consistent with 24 GALL and we added one more program consistent with 25 So we have 14 programs consistent with GALL. GALL.

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

(202) 234-4433

159

	160
1	Since then several of the programs we've asked to make
2	enhancement to. So the numbers keep changing a little
3	bit. But somewhere between 12 and 14 programs are
4	consistent with GALL.
5	During the audit we had six programs that
6	were plant specific and we added another electrical
7	program after the audit. So seven programs are plant
8	specific.
9	Of the 40 aging management programs that
10	we looked at, 30 programs are existing programs and 10
11	are new programs.
12	During the AMP audit we scared Ken Chang
13	a little bit. When he left we had about 50 open items
14	out of 165 questions. We managed to close all of them
15	by Friday when we left.
16	One was the E6 issue. And we closed it
17	but then we made it an RAI because it was going to
18	take more time than we had there to resolve it.
19	MR. BARTON: What's the difference between
20	165 questions during the AMP audit and 329 audit
21	questions?
22	DR. DAVIS: Those are total questions.
23	329 is the total. Because on the AMR review we had
24	164 questions. So we had 165 on the first audit, 164
25	on the second audit.

(202) 234-4433

	161
1	And then the AMR review we had one issue,
2	which they did a weld overlay. We asked the
3	Headquarter staff to do a flaw evaluation to see if
4	they'd done their flaw evaluation correctly, just to
5	check it. So we closed that one in an RAI.
6	MEMBER SHACK: Where was the weld overlay
7	since they have a whole new recirculation system,
8	right?
9	DR. DAVIS: I don't recall exactly.
10	MR. BUCKBERG: It's a nozzle. I think it's
11	a CRD nozzle or something.
12	DR. DAVIS: It was a nozzle repair.
13	MR. PACE: This is Ray Pace from Pilgrim.
14	We have one weld overlay that's recent on the N10
15	nozzle. It was a CRD return line that was cut and
16	capped and there was a problem with the weld of the
17	cap to the nozzle.
18	MR. BUCKBERG: Okay. Thank you.
19	DR. DAVIS: This is an interesting issue
20	because to do a weld overlay, and that's a code case.
21	The code cases aren't valid for the extended
22	operation. So that one got a little bit tricky.
23	Because 5055(a) does not allow you to extend code
24	cases past the current interval. So what we did was
25	we had to make a commitment to do a code repair. And

(202) 234-4433

	162
1	then when they get within 12 months of the next
2	interval, they can come in for relief from the code or
3	they can use an approved code case.
4	There were 36 commitments made during the
5	audit. And commitments basically are to implement a
6	new program or to enhance a procedure to conduct some
7	type of an inspection, like the tank bottom inspection
8	UT to perform a code repair or it goes into the
9	tracking system. So anytime they're making a change,
10	we request that they give us a commitment.
11	MR. BARTON: How come on these
12	commitments, I noted someplace that the commitments
13	no commitments were being implemented to June 8, 2012,
14	which is the start of their extended period. Why
15	wouldn't some of these be implemented as they
16	DR. DAVIS: They are.
17	MR. BARTON: Okay.
18	DR. DAVIS: They are.
19	MR. BARTON: Somewhere it wouldn't be
20	until June 8th and I wondered why. But you said they
21	will be implemented. Okay.
22	DR. DAVIS: Yes. This is one of my boss,
23	Ken Chang's pet peeves. Is if you have 44 commitments
24	and you have one day to do them all, you're not
25	probably going to finish them.
	I

(202) 234-4433

	163
1	MR. BARTON: Exactly.
2	DR. DAVIS: And so I've learned from
3	working with Ken that I ask the applicants, you know
4	you can't do them all on the last day. You've got to
5	schedule them. And of course they're going to
6	schedule them. We had them actually put them in the
7	plan of when they're going to start them. And some of
8	them are two years ahead of time, some are a year
9	ahead of time. But they can't all be on the last day.
10	If you're going to do an inspection of
11	four tanks, you don't want to be doing them one day.
12	Now we had a couple of open items that I'd
13	like to discuss. And they've already been discussed,
14	so I'll just touch on them again.
15	The fire protection program, they're not
16	adequately addressing the aging effects of
17	inaccessible seals. And this was one of the easier
18	ones we had to resolve, because they have no
19	inaccessible seals. So that item is closed.
20	MEMBER SHACK: How about the sampling in
21	the program, there was a discrepancy on that? The
22	difference between the GALL, 10 percent versus
23	DR. DAVIS: Naeem, can you answer that?
24	MR. IQBAL: I think the program they're
25	doing 25 percent, so they're doing more than the GALL

(202) 234-4433

	164
1	requirement.
2	MEMBER SHACK: Yes, there was 25 percent
3	of all versus 10 percent of each type I thought was
4	the difference. They were doing more, but they were
5	only guaranteed to do one of each type although they
6	did more, at least as I understood the issue.
7	MEMBER BONACA: That's right.
8	MR. COX: Alan Cox with Entergy.
9	And I think the answer to that lies in the
10	number of seals that we're dealing with here. We're in
11	the hundreds, even up to the thousands of seals of
12	each type. So if you do 20 percent on a completely
13	random basis, which is the way the program is set up,
14	you're doing 20 percent of 3,000 seals and you're 99.9
15	percent sure that you're going to get at least 10
16	percent of
17	MEMBER SHACK: Okay. You just worked
18	through a statistically likelihood of meeting the
19	requirement.
20	MR. COX: Right. Very unlikely that
21	you're not going to have at least a very
22	representative sample of every type.
23	MEMBER SHACK: Your literally doing these
24	seals at random. Someone sits there with a random
25	number generator and plucks seals out of the air?
	I contract of the second se

(202) 234-4433

	165
1	MR. COX: Yes. My understanding is it's a
2	computer program that does exactly that.
3	MEMBER SHACK: A true sampling program. I
4	can't believe it.
5	DR. DAVIS: The next one was the
б	containment inservice inspection. And we paid a lot of
7	attention to this because we have the interim staff
8	guidance on the corrosion of the containment shell.
9	And we were very concerned about any evidence of
10	leakage because the interim staff guidance says that's
11	one of the things that you do is if you have no
12	evidence of leaking, then there's a pretty good chance
13	that you're not getting corrosion.
14	When we found out that there was water on
15	the torus room floor that caused a lot of internal
16	meetings to occur and a lot of RAIs, additional RAIs
17	to go. And then a number of conversations with the
18	applicant. And as they have shown you, they've done
19	quite a big of work to resolve this.
20	We had a few additional issues in the last
21	week, and we've resolved those. Things like
22	MEMBER WALLIS: This switch that was
23	inoperative, that was the six gallons per minute?
24	DR. DAVIS: Yes.
25	MEMBER WALLIS: That's a lot of flow to
	I contract of the second se

(202) 234-4433

	166
1	set the setpoint at.
2	MEMBER SHACK: Bellows failure.
3	MEMBER WALLIS: Yes, it's a real failure
4	they're looking for.
5	DR. DAVIS: But they haven't seen any
6	evidence of leaking.
7	MEMBER WALLIS: Is this something that
8	goes into a bucket?
9	DR. DAVIS: No. I think that goes into the
10	rad waste system.
11	MR. BETHAY: Right.
12	MEMBER WALLIS: Okay.
13	DR. DAVIS: This is a zone 3 seismic area
14	and we were a little bit concerned about what happens
15	if you have a seismic event.
16	MEMBER WALLIS: Yes, I was going to ask
17	about that. I mean, all this business about we
18	haven't about seismic. But this is a seismic area,
19	isn't it?
20	DR. DAVIS: Right. Zone 3.
21	MEMBER WALLIS: What sort of earthquakes
22	have they had there?
23	DR. DAVIS: I'm not really sure that
24	they've had any recently.
25	MEMBER WALLIS: The earth has shaken in
	1

	167
1	New England over the past few decades.
2	MR. FORD: This is Bryan Ford with
3	Entergy.
4	We have had a couple of earthquakes. We
5	had a very, very small one outside of Plymouth just a
6	year and a half ago that barely felt at the plant.
7	I want to say our seismic design is based
8	upon a earthquake that happened 1860 is the one that
9	defines it for the area.
10	MEMBER WALLIS: There's a ground shaking
11	event when some people came from England and landed in
12	Plymouth, too.
13	DR. DAVIS: We were concerned about that
14	and what would happen if the leakage would increase as
15	the result of earthquake, or the 100 flood. And in
16	our discussions they've got drains that would handle
17	that. And they would have a flood in the torus room.
18	MEMBER WALLIS: You worried about tsunami
19	in Cape Cod Bay
20	MR. BETHAY: If I could, Jim, I think Dr.
21	Ulm has some interesting thoughts on that if you could
22	indulge Dr. Ulm.
23	DR. ULM: So I think as far as earthquakes
24	are concerned, as we discussed this morning, the four
25	millimeter cylinder does not do anything in terms of
1	

(202) 234-4433

	168
1	damaging the structural performance of the slab,
2	foundation slab when an earthquake occurs.
3	The only question which one could raise is
4	the question what would be if the pressure in the
5	fluid face or in the water below the foundation rises
6	so to increase the pressure.
7	So if you look at typical values of this
8	pressure increase and you increase this by, let's say
9	a factor of five, which actually would lead to
10	liquefaction, typically the type of pressure increase
11	which you have because you're under undrained
12	conditions, you would basically expect over that
13	period of time of an earthquake to see five times that
14	much to increase of the hydraulic head five
15	times as much liquid coming through the hole.
16	Now if you take duration typically of an
17	earthquake, ten seconds, seven seconds, five seconds,
18	depending on that, so it would be pretty short.
19	However, if you look at the aftermath until the water
20	actually dissipates, the water pressure below the
21	foundation dissipates to become homogeneous again,
22	that may take some time. And if you look at the soil
23	which is below, so this granule material, it may take
24	up to three hours that you go back to normal pressure
25	level.
	I

(202) 234-4433

169 1 In other words, what would you expect 2 altogether is maybe something like one-third more of 3 the water which you see under normal operating 4 conditions if you call them normal operating 5 conditions of the water coming in there, which is something like six liters per day. 6 7 DR. DAVIS: So we've hopefully we've all. So we spent a lot of effort and a lot of concern. 8 9 It's also interesting to note that P.T. Kuo who is a seismic engineer, and he had the original 10 11 design code in his office. So he looked -- he 12 generated some questions about the design of the base 13 mat. 14 And I think that finishes the audit 15 section. CHAIRMAN MAYNARD: Okay. Before we go on, 16 let's take a short break. Let's take a ten minute 17 break and then we'll come back and finish up with your 18 19 presentation. And then we'll have time for discussion 20 among the members here. 21 So we'll come back at 15 'til. 22 (Whereupon, at 2:32 p.m. a recess until 23 2:43 p.m.) 24 CHAIRMAN MAYNARD: I'll go ahead and call 25 the meeting back into session. And Perry --

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

	170
1	MEMBER SHACK: Mr. Chairman, can I
2	interrupt for just one thing that came up when we were
3	on the seismic issue. You mentioned you had the Cape
4	Anne earthquake, and it sort of dawned me that your
5	design basis was probably wrong before in LANL and
6	EPRI curves and that sort of thing. When you compute
7	your seismic CDF of 2.3 times ten to the minus five
8	you must use a recurrence frequency. Do you have any
9	idea what that recurrence frequency is for your
10	earthquake?
11	DR. DAVIS: No.
12	MEMBER SHACK: That number just comes up.
13	DR. DAVIS: Yes. Just doesn't leak to the
14	front of
15	MR. BETHAY: If you'd like, we can get
16	somebody to step out and make a call and find out what
17	the recurrence frequency is.
18	MEMBER SHACK: I'm just curious.
19	MR. BETHAY: Okay. We'll find that out
20	for you.
21	CHAIRMAN MAYNARD: Okay. Perry, TLAA.
22	MR. BUCKBERG: Okay. For the record, I'm
23	Perry Buckberg. I'll be presenting Section 4 Staff
24	review.
25	The applicant included the TLAAs shown in
	1

(202) 234-4433

	171
1	the license renewal application. The six TLAAs could
2	not be accepted as originally evaluated due to the
3	unacceptable performance calculation, as all discussed
4	earlier in detail.
5	All six TLAAs are related to open item 4.2
6	CHAIRMAN MAYNARD: How do you from
7	regulatory space expect that to be handled? They're
8	probably not going to have an answer by next August or
9	September, or do you expect it to be resolved or are
10	you carrying this as purgatory item or
11	MR. BUCKBERG: It's going to be a
12	condition, license condition. I believe there's a plan
13	right now in place. We haven't worked it through yet
14	completely. That's what we expect.
15	MR. MITCHELL: Yes. This is Matthew
16	Mitchell, Chief of the Vessels and Internals Integrity
17	Branch, NRR.
18	That is what we understand that the
19	applicant's proposal is going to be is to establish
20	concrete fixed fluence limits in relation to these
21	various TLAAs that will then be monitored with a
22	license condition wherein the applicant will have to
23	come in with an influence evaluation acceptable to the
24	staff to demonstrate that those previously established
25	fluence criteria limits are met when they do their
1	I Contraction of the second

(202) 234-4433

	172
1	updated Regulatory Guide 1.190 compliant analysis.
2	CHAIRMAN MAYNARD: Okay.
3	MR. MITCHELL: We understand that's the
4	proposed path. We will evaluate that when we see the
5	details of the applicant's proposals in response to
6	the open item.
7	CHAIRMAN MAYNARD: Okay.
8	MR. BUCKBERG: Some background in neutron
9	fluence. The Staff finds the RAMA, which stands for
10	radiation analysis modeling application, methodology
11	for calculating fluence acceptable provided adequate
12	benchmark and can be performed. The applicants
13	calculations were deemed not acceptable by the Staff
14	because the only available dosimetry sample was not
15	acceptable as a benchmark.
16	The applicant will establish and submit
17	for industry review specific neutron fluence criteria
18	which must be met to verify the acceptability of the
19	bounding TLAA analysis. The applicant will, in
20	accordance with their proposed license condition,
21	complete an updated neutron fluence evaluation and
22	submit it for Staff review and approval prior to
23	entering the PEO, period of extendEd operation. The
24	Staff will confirm that all neutron fluence criteria
25	associated with the identified TLAAs have been met
l	

(202) 234-4433

	173
1	based on this updated applicant neutron fluence
2	evaluation. That's the plan as we understand it right
3	now.
4	Section 4.3, metal fatigue, to change the
5	subject that is. Components are designed to either
6	ASME B31.1 code for piping or for vessel components
7	ASME Section 3. Through the audit commitments 31 and
8	35 were added to address effects of fatigue.
9	Section 4.4, EQ of electrical equipment.
10	The Staff reviewed the applicants TLAA on the
11	environmental qualification of electrical equipment
12	and concluded that the evaluation was acceptable.
13	Conclusions. On the basis of its review of
14	the LRA, with the exception of open item 4.2 and
15	pending resolution of open items 2.3.3.6, 3.0.3.2.10
16	and 3.0.3.3.2 the staff determines that the
17	requirements of 10 CFR 52.29(a) have been met.
18	Questions?
19	CHAIRMAN MAYNARD: Does anyone have any
20	questions for the Staff?
21	What I plan to do is if there's anymore
22	questions for the Staff, any other burning questions
23	that we need to raise, and then we'll go around the
24	room and just kind of talk about, input as much as
25	anything, for the full Committee meeting which doesn't

(202) 234-4433

	174
1	occur until like August/September time frame. So a
2	little bit of time there.
3	So, with that, any questions for the
4	Staff?
5	MEMBER ARMIJO: I had one more
6	clarification. Now, the licensee presented
7	information, you know something on the order of a
8	dozen UT measurements had been made, but they didn't
9	provide any numbers. Did you actually see the
10	numerical values of the containment shell and were
11	these close to the nominal
12	DR. DAVIS: They all were nominal.
13	MEMBER ARMIJO: They were nominal? Okay.
14	DR. DAVIS: In the shell.
15	MEMBER ARMIJO: Yes.
16	CHAIRMAN MAYNARD: Okay. Any other
17	questions? Any other for the applicant?
18	I'll tell you what I'd like to do is to
19	take a few minutes, go around any general comments.
20	And I think one of the things we need to accomplish
21	out of this is to identify for when this comes to the
22	full Committee any specific items that you believe we
23	need to focus on. I believe, obviously, the fluence
24	issue is going to need to be discussed. I believe
25	that the moisture is going to need to be discussed in
1	

(202) 234-4433

1 detail. And if there's any of the other issues that 2 you'd like to see, I'd like to get that identified now 3 to give both the Staff and the applicant something to 4 be prepared for us.

I just a follow up 5 MEMBER ABDEL-KHALIK: question to the gentleman from MIT who provided some 6 7 information. He indicated that the calculated seepage 8 rate, the estimated seepage rate is between 3.2 and 9 6.4 kilograms per meter square per day. And based on a wetted area in each bay of about, the worst case, of 10 about 20 square meters, that corresponds to about 20 11 12 to 30 gallons per day. And presumably if the water doesn't cool very much in these bays, that you're 13 14 evaporating this water as it seeps out, can you 15 actually evaporate 30 gallons per day in that area?

MR. BETHAY: Yes. I think the calculation that Franz did was an extremely conservative one. You know, just by observation you go down and look, I would say it's a few gallons of water on the floor. It's clearly an equilibrium. So it is evaporating whatever is coming in in bay 10, as I showed you, which is the worst one.

When you go down there it's always about that amount of water on the floor. So whether the calculation is very conservative and the actual end

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

	176
1	leakage at that point is significantly, it has reached
2	a state of equilibrium that the puddle doesn't seem to
3	get any bigger, it doesn't get a whole lot smaller.
4	MEMBER WALLIS: So it's not leaking very
5	much and it's not evaporating very much? You just see
6	a puddle which is essentially static.
7	MR. BETHAY: And I would agree with you,
8	sir.
9	MEMBER WALLIS: It's nothing like 30
10	gallons a day. It couldn't be.
11	MR. BETHAY: Agree. I think that's a very
12	conservative assumption.
13	MR. BARTON: What's the temperature in the
14	torus room?
15	MR. BETHAY: It varies. Of course during
16	the year I would say the other day, Monday when I was
17	down there, it was 75 degrees. It was comfortable in
18	scrubs.
19	MEMBER BONACA: The condensation dripping
20	all over the place.
21	CHAIRMAN MAYNARD: Well, Said, maybe
22	that's something for the full Committee to come back
23	and have some more discussion.
24	MEMBER ABDEL-KHALIK: Right. I mean,
25	calculations can be so conservative that they become

(202) 234-4433

	177
1	meaningless. And the question is what's a realistic
2	number.
3	MR. BETHAY: Okay. Bryan, let's take that
4	action to refine
5	MEMBER WALLIS: I don't see how you can
6	calculate it. Because you don't know anything about
7	the cracks. You just know how much water is there.
8	MEMBER SHACK: I mean you back calculate
9	the crack size.
10	MEMBER WALLIS: You calculate the crack
11	size.
12	MEMBER ABDEL-KHALIK: As I indicated
13	before you can do a calculation where you use all the
14	amount of material, that white stuff that has
15	accumulated, to come up with an integral amount for
16	the total amount that has right.
17	DR. ULM: Since I was the one who made
18	these conservative estimates, so let me say how I did
19	come to them.
20	So my calculation was based on the
21	following. It was felt that a previously dried area,
22	there was observed reoccurrence of water in roughly a
23	time frame of one to two days. And looking on the
24	pictures which we have, when you look at the maximum
25	amount of area which was touched, I said let's say the
1	

(202) 234-4433

	178
1	maximum amount what you can have maybe half of it.
2	Half of it. So I speak about the orders of magnitude
3	here.
4	So the orders of magnitude to which I came
5	up then here is a comparison with an amount of water
б	which normally seeps through concrete. And this is
7	roughly 300 times more per unit surface than what you
8	observe there. And so I came to the conclusion that
9	it's a very localized phenomenon.
10	And then I said, okay now let me calculate
11	what would be the worst, the biggest size of cylinder
12	which I can get if the whole area so the 20 square
13	meter, would be flooded with a half quarter to half an
14	inch of water in there and let me calculate on that
15	basis the amount of the cylinder size, which that was
16	the 4 millimeter.
17	In the report which is with Entergy, I
18	said let's say this is an absolute upper bound and I
19	would expect actually that the size of the real one is
20	in the sub-millimeter scale, so it's below the
21	millimeter size. But I want to give here the worst
22	case scenario to say, let's say, in order to come to
23	a conclusion about whether or not a four millimeter
24	cylinder will effect the seismic stability of it and
25	structural performance of the base mat.
1	

(202) 234-4433

	179
1	So that was the idea to that equation.
2	MEMBER SHACK: Yes, but a four millimeter
3	cylinder is a little phony. I mean what you're sort
4	of saying is you can't have cracked this thing up all
5	that much in order to come up with an equivalent level
6	size that would fill a four millimeter cylinder. I
7	mean it's not just broken up very much, is my
8	conclusion which I gained from it, so
9	DR. ULM: And it's very concentrated.
10	MEMBER SHACK: It's a pretty integral
11	thing.
12	MEMBER BONACA: It seems to me that if a
13	room was dried up, to raise the inflow of the water it
14	seems to be low enough that you could see, first of
15	all, the where it's coming from location wise and
16	second, you could also judgment on the rate at which
17	it's coming in. And, has anybody intended to do that?
18	MR. BETHAY: Yes. If you noticed in the
19	very first photograph that I showed Steve Bethay.
20	The very first photograph I showed of bay
21	10 the photograph on the right showed a tinted
22	enclosure. That's exactly why that was tented.
23	There's a small berm that was built around one of the
24	bolts. It was dried out completely excavated of
25	water, dried out completely. Tented over, you know,
	1

(202) 234-4433
	180
1	condensation or nothing added to. And then what Franz
2	calculated was based on how long it took water to
3	reappear in that area. That's correct.
4	MEMBER ARMIJO: And it did happen, right?
5	MR. BETHAY: It did happen.
6	MEMBER ARMIJO: The water did reappear?
7	MR. BETHAY: Yes, sir. Yes, sir.
8	And Franz' calculation, correct me, but he
9	based it on the theoretical permeability of concrete
10	would have such a rate coming through. The rate that
11	we saw we obviously much greater than the theoretical
12	permeability of concrete. So we know there's some flow
13	path.
14	MEMBER WALLIS: Well, it's probably not
15	seeping in everywhere. It's probably seeping in from
16	a few places. And I think if you actually carefully
17	examined it or put in some traceable dye or something,
18	you could probably figure out where it's coming from,
19	if you wanted to. It's not seeping in from everywhere.
20	It's seeping in from a few places where it's probably
21	where the concrete was joined in the manufacturing of
22	the bed and in the base mat.
23	MR. BETHAY: And that's exactly the goal
24	of the commitment that we have to lift the base
25	plates, look under them, see what we see and follow
	1

(202) 234-4433

	181
1	the trail from there.
2	MEMBER WALLIS: Right.
3	CHAIRMAN MAYNARD: Mario, I'll start with
4	you. Comments, thoughts
5	MEMBER BONACA: Regarding whatever today
6	or
7	CHAIRMAN MAYNARD: Yes, what you heard
8	today and then also to focus on anything in addition
9	to what I brought up earlier that what needed to be
10	discussed at the full Committee.
11	MEMBER BONACA: Well, I think I was
12	positively impressed by the presentation. I think the
13	issues have been dealt and with the communication is
14	good.
15	I think that the open items can be closed.
16	I mean, they're on their way to being dealt with, most
17	of them.
18	And regarding the main Committee meeting,
19	I think that the emphasis should be again on what we
20	have today on the torus room, that's important. I
21	think that's on the part of the licensee.
22	Again, we will have much of a summary of
23	licensee committees or whatever. It is good. Because
24	we don't need to have a lot of information. Mostly
25	just look at the issue of water coming in and the
	1

(202) 234-4433

	182
1	issue of the containment shell. Both of them will be
2	of interest to the Committee.
3	Insofar as the Staff, I certainly
4	appreciate their presentation from the inspection,
5	from the inspector. And I think that's important.
6	That's going to be of interest to the whole Committee.
7	And pretty much the format of today,
8	again, we didn't have a lot of slides from the Staff
9	with, you know, items such-and-such, numbers that were
10	included. It not very important for the Committee
11	itself. But for example those insights from the
12	walkdowns and the inspections, those are very
13	important.
14	I think that's pretty where I am.
15	CHAIRMAN MAYNARD: Said?
16	MEMBER ABDEL-KHALIK: I think the only
17	question that remains in my own mind is the issue
18	benchmarking. And it is not clear to me how the
19	benchmarking process itself will be done and what the
20	outcome of the process will be. And therefore in the
21	full Committee presentation I think it might be a good
22	idea to outline how this benchmarking process will be
23	done and what sort of an acceptable outcome of that
24	process from the Staff's perspective would be.
25	I mean in a big picture they'll come back
	I

(202) 234-4433

	183
1	and say either the code is wrong or the data was
2	wrong. And I'm not sure if either one of these would
3	be acceptable to you. So, just what the process will
4	be and what the projected outcome will be that would
5	satisfy your condition.
б	MR. LOIS: This is Lambrose Louis and
7	we're at the Systems Branch. And I'm involved with
8	the fluence issue.
9	Benchmarking in this case is to be able to
10	demonstrate that a specific dosimetry from inside the
11	vessel, or some other location, can be accurately
12	calculated using the RAMA code. That's benchmarking,
13	published with benchmarking.
14	In Regulatory Guide 1.190 there are
15	specific objectives for the benchmarking as well as
16	uncertainty limits within which it is acceptable such
17	a benchmarking.
18	The code has been based on adequate
19	benchmarking for BWR4s. Mainly we had enough data to
20	decide that this was sufficiently accurate code. The
21	code does a very good job. Actually it's one of a
22	kind based on different principles than the
23	conventional codes that have been in use for the last
24	50 years, 40 years, whatever it is, on discrete
25	ordinance. And so it produces higher accuracy than
	1

(202) 234-4433

	184
1	the conventional codes.
2	So we don't really have much of a problem
3	as to the performance of the code. The question is
4	whether we can get an accurate measurement or well-
5	known location and be able to reproduce that. It's
6	not as simple as it sounds. It's a very complicated
7	calculation. But, of course, it is being done
8	everyday in plants and is part of the requirements.
9	I don't have a problem that the licensee
10	will be able to provide such a proof, so to speak.
11	MEMBER ABDEL-KHALIK: You know, I hope
12	you're right. I just would like to see the process of
13	how they will go about doing that.
14	MR. LOIS: Well, of course, the specific
15	means of approving that is up to the licensee.
16	There's quite a variety of ways they can do it.
17	MEMBER ABDEL-KHALIK: That's it. Thank
18	you.
19	CHAIRMAN MAYNARD: Sam?
20	MEMBER ARMIJO: Oh, I agree with what
21	Mario and Said said. I think the water issue on the
22	floor, it has been handled very well. I think it's
23	pretty convincing that that they know where the source
24	is and at the rates of which the water comes up. So
25	I'm pretty comfortable that.
1	

(202) 234-4433

	185
1	I think the full Committee should hear
2	that story.
3	In the case of the fluence, something is
4	wrong, with all due respect to the Staff. If the
5	code's good and the symmetry's good, then the inputs
6	are bad. Something is bad going on there. You
7	shouldn't be off that much. And I just worry that it
8	might open up other issues, this discrepancy might
9	lead to other issues related to the plant that we're
10	not aware of.
11	MR. LOIS: Again, this is Lambrose Louis.
12	What conventionally through experience we
13	know to be wrong is the location of the capsule,
14	traditionally. We have had this problem in the past.
15	And we have disqualified a number of capsules from
16	other plants because of very wide discrepancies
17	between calculated the measured value, which
18	eventually we're able to identify them, but they were
19	not in like, direct location.
20	As you know
21	MEMBER ARMIJO: That kind of information
22	would be very helpful.
23	MEMBER SHACK: You might just point what
24	the accuracy required for that location is?
25	MR. LOIS: Well, what we require in the
	1

(202) 234-4433

186 Commission paper, it's plus or minus 20 percent one 1 2 However, recently -- recently in the last sigma. 3 several years, five or ten years, the actual 4 performance of most calculations is in the 5 neighborhood of ten percent. MEMBER SHACK: Yes. But I mean what is the 6 7 physical location of the specimen you need? 8 MR. LOIS: In the inside of the pressure 9 vessel. 10 MEMBER SHACK: No. 11 MR. LOIS: I'm sorry. 12 MEMBER SHACK: How accurately do you have to know the location of your dosimetry. 13 MR. LOIS: Oh, very accurately. We're in 14 a location, obviously, where the --this extremely 15 16 steep gradient of the fluence. And that makes it 17 extremely important that one knows precisely where the location is. 18 19 A quarter of an inch, for example, will 20 throw you off a 100 percent, or nearly. 21 MEMBER ABDEL-KHALIK: That qualitative 22 description in some way if it could be worked into the 23 Staff's presentation or the licensee's for the whole 24 Committee would be helpful. Because it seems like a 25 big discrepancy and there's no --

> NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

(202) 234-4433

	187
1	MR. LOIS: Yes. The number is large.
2	However, the cause of it could be relatively small in
3	terms of inches, let's say, if the location of the
4	capsule was not accurately known.
5	MEMBER ABDEL-KHALIK: That's it.
6	CHAIRMAN MAYNARD: Graham?
7	MEMBER WALLIS: Yes. This looks like a
8	pretty straightforward license renewal. The thing
9	that was interesting was, of course, the water on the
10	floor which took up 60 percent of the slides. And the
11	thing that surprised me was it seems to have been
12	initiated by the inspection. I would think if it was
13	a characteristic that's somehow different in this
14	plant, something notably different about this plant,
15	that it would have been part of the application. It
16	would have been cleared up at that stage and wouldn't
17	have required the inspectors to raise the question,
18	which seems to be what happened. Maybe I got the story
19	wrong. But it looks as if it was the inspectors who
20	raised the question about what about all this water
21	that's been on the floor over all and then it
22	turned out it had been over many years. I would have
23	expected that to have been cleared in the application.
24	Not to have to have been cleared up afterwards.
25	Otherwise, it seems very straightforward license

(202) 234-4433

	188
1	renewal. No issues.
2	CHAIRMAN MAYNARD: Bill?
3	MEMBER SHACK: No. It was a good
4	presentation today. I think it did clarify some of
5	the things and sort of made me confident that the
6	problem is as described and it's not part of the
7	drywell shell problem that effects our judgment.
8	I think that the Staff has a well defined
9	process for how to resolve the fluence question. And
10	they will provide the evidence, and if they don't,
11	they won't get an approvement for the method. So I'm
12	not too concerned.
13	CHAIRMAN MAYNARD: Tom?
14	MEMBER KRESS: I agree with most of what
15	I hear. I would like to add a comment on the fluence
16	issue. I don't see that big of a difference from
17	BWR4s and 3s. I don't see why the validation data for
18	RAMA from BWR4s couldn't be applied to say it's valid
19	for BWR3s.
20	I'd like to see more discussion on why
21	that data isn't happening.
22	MR. LOIS: I can respond to that, Dr.
23	Kress.
24	This is Lambrose Lois again.
25	You'll be surprised at the kind the
	1

(202) 234-4433

	189
1	type of reactor makes some difference. We've seen
2	that I've seen that because I have reviewed other
3	methodologies and product lines.
4	For example, between BWR I mean PWR,
5	you think well the Westinghouse and Combustion were
6	the same, yet as each one population of the data were
7	different.
8	The same thing from, obviously, with the
9	only vendor we've seen for PWRs between PWR4s and the
10	remaining of the data that were available.
11	Now in this particular case with the BWRs,
12	unfortunately, we didn't have the number of data we
13	had for PWRs.
14	MEMBER KRESS: One data point, that's all.
15	CHAIRMAN MAYNARD: Yes, one data point.
16	Anything else, Tom?
17	MEMBER KRESS: No, that's good.
18	CHAIRMAN MAYNARD: Okay. John?
19	MR. BARTON: I think you hit the important
20	issues that you want to bring before the full
21	Committee and there really only two issues.
22	As far as the presentations, I think the
23	applicant made a terrific presentation. It's probably
24	one of the best I've seen as far as presenting your
25	application and what your issues are and the ability
1	

(202) 234-4433

	190
1	to answer the questions. I thought that was very good.
2	As far as the application itself goes, I
3	thought it was well prepared. It was one of the
4	easiest ones I think to read and go through. Not a
5	lot of flip flopping back and forth to find out. It
б	was well organized.
7	That's about it. I thought it was a
8	pretty good application. It's one of the better ones
9	I've reviewed.
10	CHAIRMAN MAYNARD: Well, I agree with the
11	comments that have been made. I think both the Staff
12	and the applicant presentations hit the important
13	issues, key issues and answered the questions that had
14	answers to them at this time. So I believe that was
15	good.
16	I think that maybe for the full Committee
17	meeting there will be more members. I think it's
18	possible it could get a few more questions relative to
19	the chemistry around the site. And I think maybe some
20	more concrete questions could potentially come out.
21	So I think both the Staff and the applicant could be
22	prepared for that.
23	MEMBER KRESS: I'm glad they measured the
24	sulphur content.
25	CHAIRMAN MAYNARD: And I'm wondering on
I	I. Construction of the second s

(202) 234-4433

	191
1	the water in the torus room, of whether this is really
2	unique or whether we're starting to get more
3	sensitive. It's not uncommon to have water on the
4	floor in some of these areas. And I don't know, it
5	may actually be something that's positive that both
6	the Staff that the Staff is getting more sensitive
7	to these things. I don't know without having gone
8	into a number of these. I think it is good that it got
9	brought up and it deserves a good thorough
10	presentation. I think it may that we're getting more
11	sensitive on some of these things, too.
12	DR. DAVIS: It's in the interim staff
13	guidance for the shell, and that's one of the reasons
14	we really took a careful look at it. Because that's
15	a strong indication that you may be having a problem.
16	And also if you have no water on the torus floor, then
17	that's a good strong indication that you don't have a
18	problem with the shell.
19	MR. BARTON: I mean, this is not the only
20	plant that's got water on the floor. So I think
21	everybody got interest really aroused here because of
22	the drywell issue in other plants. And you wonder
23	about okay, how is this related to that. And I think
24	that's what really raised the interest in this issue.
25	DR. DAVIS: That's right.

(202) 234-4433

	192
1	CHAIRMAN MAYNARD: Okay. If there is no
2	other questions or comments
3	MS. LUND: Dr. Maynard, I just want to
4	make a quick comment. This is Louise Lund.
5	And then also, I think this also points
6	out the value of a license renewal inspections that
7	are performed, you know. And it gives us an
8	opportunity to identify these and they get to pull on
9	the thread of where the water's actually coming from.
10	So, that's you know, they did an
11	outstanding job in doing that.
12	MEMBER SHACK: I just wonder how many
13	variations we'll find on this drain design that GE put
14	into these things. Yes, we've see Nine Mile, we've
15	seen Oyster Creek and this one doesn't look like
16	either one of those.
17	MR. BARTON: And some of the MODs
18	resulting in blocks the drains.
19	MEMBER WALLIS: I'd like to know what a
20	nuclear grade bucket looks like.
21	MEMBER SHACK: They're only white plastic.
22	CHAIRMAN MAYNARD: Just as we get all this
23	figured out, then we switch to a different model
24	DR. DAVIS: And it costs \$1,000.
25	CHAIRMAN MAYNARD: If there's nothing

(202) 234-4433

	193
1	else, we're adjourned. Thank you very much.
2	(Whereupon, at 3:12 p.m. the Subcommittee
3	meeting was adjourned.)
4	
5	
б	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
1	