

Conte, Richard

From: David Pelton
Sent: Friday, May 01, 2009 2:32 PM
To: Richard Conte; John White; John Richmond; Karl Farrar; Peter Wilson; Lisa Regner; Louise Lund; Michael Modes; Neil Sheehan
Subject: RE: APP questions re: Oyster Creek

Rich,

After some digging in the OC SER and talking with Sam Lee, the Buried Piping Inspection Program is not designed to be a 100% inspection. Rather, within 10 years of entering PEO, the licensee will 1) perform inspections of portions of system piping with high likelihood of corrosion problems or system piping with a history of corrosion and/or 2) will take advantage of on-going maintenance opportunities and inspect portions of system piping if/when excavation is performed adjacent to the piping.

dave p.

From: Richard Conte
Sent: Friday, May 01, 2009 1:02 PM
To: David Pelton; John White; John Richmond; Karl Farrar; Peter Wilson; Lisa Regner; Louise Lund; Michael Modes; Neil Sheehan
Subject: RE: APP questions re: Oyster Creek

I need to clarify that OC does have at least one buried tank(maybe more), they are included in other programs not the one to which the CST piping is committed.

also need to clarify that, per SER, the buired pipe program does require inspection of each material - environment combination before PEO (opportunistic or focused) and a focused inspection will be performed within the first 10 years of the PEO. The draft report documents inspections before the PEO.

Question: Does the last paragraph above mean that 100% of buried piping will be inspected within 10 years of the PEO? not prepared to address right now.

From: David Pelton
Sent: Friday, May 01, 2009 10:59 AM
To: Richard Conte; John White; John Richmond; Karl Farrar; Peter Wilson; Lisa Regner; Louise Lund; Michael Modes
Subject: RE: APP questions re: Oyster Creek

Rich,

Your proposed responses look good to me...

dave p.

From: Richard Conte
Sent: Friday, May 01, 2009 10:26 AM
To: John White; John Richmond; Karl Farrar; Peter Wilson; Lisa Regner; David Pelton; Louise Lund; Michael Modes
Subject: RE: APP questions re: Oyster Creek

After consultation with Peter Wilson and the desire to give some information, here goes an attempt. Karl please review in light of our conversation with Mr. Webster he obviously is talking with APP:

Who is in from NRR?

Q1. Were the pipes found to have the holes in them inspected before the NRC granted a license renewal for Oyster Creek?

A1. At least one of them was inspected by Exelon but it looks like in a different spot. The key principles for the buried pipe (or tanks, OC has not buried tanks) program is to rely on preventive measures to mitigate corrosion such as by protective coatings or wrappings and to periodically inspect a representative samples of piping material within the local soil environment informed by operating history. This is not a 100% inspection of every section of buried piping. More details can be found in the NUREG 1801, April 2001, available on the NRC webpage related to license renewal.

Q2. What is the schedule for inspecting the pipes?

A2. Per the NRC SER, the accepted schedule was that, during the period of extended operation, the buried piping will be inspected within 10 years unless an opportunistic inspection occurs within any 10 year period. NRC does not have more specific information related to specific piping and scheduling information. We do know some piping was inspected before the PEO for varying opportunistic reasons.

Q3. Were the pipes supposed to be covered under the plant's aging management plan?

The CST and most of the associated piping are covered by at least two aging management programs, Above Ground Outdoor Tank Program and Buried Piping Program.

Q4. And if so, why did they have holes in them?

A4. Exelon's cause of the current leakage has not been determined yet.

Q5. Was the condensate storage tank supposed to be inspected prior to the granting of a license renewal?

A5. We are currently reviewing that and it will be addressed in the inspection report 2009-006 which is schedule to be issued around mid May 2009 (the reason for acceptability of the deferral to June 2009, complex and deliberative).

Q6. And if not, when was it supposed to be inspected?

A6. see A5.