

Farrar, Karl

From: Richard Webster [rwebster@easternenvironmental.org]
Sent: Wednesday, June 03, 2009 5:29 PM
To: Sam Collins
Cc: Richard Barkley; Brian Harris; Karl Farrar
Subject: Re: REPLY re: R. Webster- Follow ups to the Annual assessment meeting

Thanks. I look forward to your response.

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On Jun 3, 2009, at 5:26 PM, Sam Collins wrote:

- > Mr. Webster: I have received your E-Mail and it is under consideration
- > for an appropriate response. Best Regards, Sam Collins
- >
- > -----Original Message-----
- > From: Richard Webster [mailto:rwebster@easternenvironmental.org]
- > Sent: Monday, June 01, 2009 1:03 PM
- > To: Sam Collins
- > Cc: Joseph McMillan; Jill Lipoti; Richard Conte; Janet Tauro;
- > paul@beyondnuclear.org ; Hannah Faddis
- > Subject: Follow ups to the Annual assessment meeting
- >
- > Mr. Collins,
- >
- > In order to follow up on our discussions at the annual assessment
- > meeting, please find attached a letter I wrote today to OIG forwarding
- > the e-mail that we discussed. As I stated to you, the opacity and
- > vagueness of the CLB to all parties remains a key problem that we
- > believe needs attention.
- >
- > More specifically, I would like to confirm my understanding of our
- > discussions on May 28 that the CLB for the underground pipes at Oyster
- > Creek requires intended function be maintained, where intended
- > function does not include containment of radioactive water. If this
- > is incorrect, please let me know as soon as possible.
- >
- > I also seek clarification of Mr. Conte's statements about the purpose
- > of the aging management programs. I note that the applicant must

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- > "demonstrate that the effects of aging will be adequately managed so
- > that the intended function(s) will be maintained
- > consistent with the CLB for the period of extended operation." [1]
- > Can you confirm that the goal of the aging management programs is to
- > prevent any violations of the CLB due to aging during the period of
- > extended operation?
- >
- > Finally, a question was raised at the meeting as to whether these
- > pipes were inspected prior to relicensing and if so, how. The NRC
- > Staff responded that this question was under review. What is the
- > status of this review? Did the safety review conducted prior to
- > relicensing also review the dates, spatial extent, and findings of
- > prior pipe inspections? If so, why couldn't NRC Staff provide any
- > information on these issues at the meeting?
- >
- > Additionally, you stated at the meeting that inspection requirements
- > for these pipes may be based upon on the guidance of American Society
- > of Mechanical Engineers (ASME) standards and the Generic Aging Lessons
- > Learned (GALL) report. [2] To the extent that inspections have relied
- > on the guidance, what requirements as to inspection frequency and
- > spatial coverage are contained in this guidance?
- >
- > Finally, at the meeting Exelon stated that the underground pipe
- > systems carrying radioactive water will be moved above ground pr place
- > in vaults. Please confirm what is planned, whether this is a binding
- > a commitment for Exelon, and what is the schedule for completion of
- > that project.
- >
- > I appreciate your attention to these issues and I look forward to
- > hearing further from you.
- >
- > [1] 10 C.F.R. § 54.21(a)(3) (2009).
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- > [2] Nuclear Regulatory Commission. NUREG-1801, Rev. 1. (2005).
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