From: Chawla, Mahesh
Sent: Wednesday, February 03, 2010 4:19 PM
To: KUEMIN, JAMES L
Cc: Pascarelli, Robert; Karipineni, Nageswara; Hoang, Dan; Thomas, George; Giessner, John; Ellegood, John; Taylor, Thomas; Lerch, Robert
Subject: Palisades - One Time Extension to the ILRT RAIs - ME2122

The NRC staff has reviewed the above License Amendment Request (LAR) dated August 25, 2009 (ML082900532), submitted by Entergy Nuclear Operations, Inc. for the Palisades Nuclear Power Plant (PNP). The LAR requests a one-time extension to the ten-year frequency for the next PNP containment Type A integrated leak rate test (ILRT) that is required by Technical specification (TS) 5.5.14. The proposed change would permit the existing ILRT frequency to be extended from 10 years to approximately 11.25 years. The NRC staff has reviewed the proposed amendment and identified additional information needed to complete its safety evaluation input. Please arrange a teleconference to discuss the following information:

1) Section 4.1 of Attachment 1 to the LAR stated that the second, third, and fourth post-operational ILRT tests, resulted in the combined calculated leakage plus the adjusted measured penetration leakage exceeding the acceptance criteria. Please provide a brief description of the reasons for exceeding the acceptance criteria, fixes made to bring the leakage to within compliance, and the performance of the items to which fixes were made during subsequent leakage tests.

2) Section 4.1 of Attachment 1 to the LAR stated that the current total penetration leakage for Type B and Type C tests on a maximum path basis is less than 11% of the leakage allowed for containment integrity. Provide the as found minimum pathway combined Type B & C total leakage values for the last refueling outage when a Type A test was performed and all the subsequent combined as found Type B & C test values since then. Provide this data in terms of percentage of leakage allowed ($0.6L_a$) and indicate if the L_a value has changed during this period.

3) The Type A Containment Integrated Leak Rate Test (ILRT), the Type B and Type C Local Leak Rate Tests (LLRTs), and Containment In-Service Inspection (CISI) program collectively ensure leak-tight integrity and structural integrity of the containment. Please provide the following for the PNP:

a. The as-found and as-left Type A test results and their comparison with the allowable leakage rate specified in the plant Technical Specifications.

4) The staff noted that the PNP will be entering into the period of extended operation (PEO) on March 24, 2011. By Technical Specification (TS) 5.5.14, PNP is required to perform its ILRT test by May 3, 2011, which is approximately six months after 1R21. Based on the licensee's relief request, PNP has requested to extend its ILRT test interval to August 3, 2012. However, in NUREG-1871, "SER Related to the License Renewal of Palisades Nuclear Plant," January 2007, on page 3-22, the staff states that the plant-specific operating experience revealed some instances where the Containment Inservice Inspection Program had been instrumental in discovering material degradation. Containment degradation included liner plate corrosion, unacceptable tendon liftoff values, tendon gallery corrosion, tendon grease leakage, the moisture barrier not in place, and tendon sheath water intrusion.

Based on the information above, the staff requests that the licensee:

a. Justify its basis for not conducting the ILRT during 1R21, which is scheduled for October 2010.

b. Examination results of IWE and IWL programs, and any corrective /preventive actions, acceptance criteria, and monitoring and trending were taken.