

May 3, 2010

Mr. Christopher Costanzo
Vice President, Nuclear Plant Support
NextEra Energy Duane Arnold, LLC
P.O. Box 14000
Juno Beach, FL 33408-0420

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
DUANE ARNOLD ENERGY CENTER LICENSE RENEWAL APPLICATION –
BURIED PIPING (TAC NO. MD9769)

Dear Mr. Costanzo:

By letter dated September 30, 2008, as supplemented by letter dated January 23, 2009, FPL Energy Duane Arnold, LLC, submitted an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54 (10 CFR Part 54) for renewal of Operating License No. DPR-49 for the Duane Arnold Energy Center. The staff of the U.S. Nuclear Regulatory Commission (the staff) is reviewing this application in accordance with the guidance in NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants." During its review from August 10, 2009, through August 14, 2009, the staff has identified areas where additional information is needed to complete the review. The staff's requests for additional information are included in the Enclosure. Further requests for additional information may be issued in the future.

Items in the enclosure were discussed with Ken Putnam, of your staff, and a mutually agreeable date for the response is within 30 days from the date of this letter. If you have any questions, please contact me by telephone at 301-415-2277 or by e-mail at Brian.Harris2@nrc.gov.

Sincerely,

/RA/

Brian K. Harris, Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-331

Enclosure:
As stated

cc w/encl: See next page

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OFFICE:	PM:RPB1:DLR	LA:RPOB:DLR	BC:RPB1:DLR	PM:RPB1:DLR
NAME:	BHarris	IKing	BPham (BBrady for)	BHarris
DATE:	04/19/10	04/29/10	04/29/10	05/03/10

OFFICIAL AGENCY RECORD

Letter to Christopher Costanzo from Brian K. Harris dated May 03, 2010

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
DUANE ARNOLD ENERGY CENTER LICENSE RENEWAL APPLICATION –
BURIED PIPING (TAC NO. MD9769)

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B. Harris
C. Eccelston
K. Feintuch
M. Spencer, OGC

Duane Arnold Energy Center

cc:

Mr. M. S. Ross
Vice President and Associate
General Counsel
Florida Power & Light Company
P.O. Box 14000
Juno Beach, FL 33408-0420

Ms. Marjan Mashhadi
Senior Attorney
Florida Power & Light Company
801 Pennsylvania Avenue, NW
Suite 220
Washington, DC 20004

Mr. Steven R. Catron
Manager, Regulatory Affairs
Duane Arnold Energy Center
3277 DAEC Road
Palo, IA 52324

U.S. Nuclear Regulatory Commission
Resident Inspector's Office
Rural Route #1
Palo, IA 52324

Mr. Mano Nazar
Executive Vice President Nuclear and Chief
Nuclear Officer
Florida Power & Light Company
P.O. Box 14000
Juno Beach, FL 33408

Mr. D. A. Curtland
Plant Manager
Duane Arnold Energy Center
3277 DAEC Road
Palo, IA 52324-9785

Abdy Khanpour
Vice President, Engineering Support
Florida Power & Light Company
P.O. Box 14000
Juno Beach, FL 33408

Ms. Melanie Rasmussen
Radiation Control Program Director
Bureau of Radiological Health
Iowa Department of Public Health
Lucas State Office Building, 5th Floor
321 East 12th Street
Des Moines, IA 50319-0075

Chairman, Linn County
Board of Supervisors
930 1st Street SW
Cedar Rapids, IA 52404

Mr. Gene St. Pierre
Vice President, Fleet Support
Florida Power & Light Company
P.O. Box 14000
Juno Beach, FL 33408-0420

Mr. Larry Nicholson
Director of Licensing
Florida Power and Light Company
P.O. Box 14000
Juno Beach, FL 33408-0420

**DUANE ARNOLD ENERGY CENTER
LICENSE RENEWAL APPLICATION
REQUEST FOR ADDITIONAL INFORMATION**

RAI B 3.7.1-X

Background

The license renewal application (LRA) states that aging management program (AMP) B.3.7, Buried Piping and Tanks Inspection Program, is a new program with one exception to the program elements in Generic Aging Lessons Learned (GALL) AMP XI.M34. This AMP addresses buried piping, i.e. piping in direct contact with soil. The description of the operating experience (OE) attribute for this AMP does not discuss specific OE at Duane Arnold Energy Center (DAEC) or from the industry. Instead, it states that “plant operating experience for this program will be gained as it is implemented during the period of extended operations, and will be factored into the program via the confirmation and corrective action elements of the DAEC 10 CFR 50 Appendix B quality assurance program.”

The LRA also states that AMP B.3.21, External Surfaces Monitoring Program, is an existing program with enhancement. This AMP is also credited for managing the aging of the external surfaces of piping exposed to air.

Issue

There have been a number of recent industry events involving leakage from buried and underground piping, where the causes have included coating damage during backfill of piping, failure of fiberglass piping, failure of buried piping in and around piping penetrations, and failure of piping in trenches. In light of this recent industry OE, the staff is concerned about the susceptibility of buried and/or underground piping that are within the scope of 10 CFR 54.4 and subject to aging management for license renewal. In reviewing the AMP's cited above, along with the applicable aging management review items associated with them, the staff is not clear whether the components addressed by these AMPs would include both buried and underground piping (piping which is below grade and contained in a vault or other structure where it is exposed to air and where access is limited), and also if such programs would be sufficient and effective in managing the aging effects of buried and underground piping.

Request

Please provide information regarding how DAEC will incorporate the recent industry OE into its aging management reviews and programs in order to adequately and effectively manage the effects of aging, specifically for systems and components that are in scope for license renewal and include buried and underground piping.

ENCLOSURE