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**Yoo, Mark**

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**From:** Pelton, David , NRR  
**Sent:** Monday, September 27, 2010 10:09 AM  
**To:** Sakai, Stacie; Yoo, Mark  
**Subject:** DLR (Pelton) E-Mail for Inclusion in Salem AFW FOIA 2010-0334

Stacie,

Here is an e-mail chain (below) that has some relevance to the Salem AFW buried piping issue.

dave p.

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**From:** Conte, Richard , RY  
**Sent:** Wednesday, August 11, 2010 1:07 PM  
**To:** Modes, Michael; Pelton, David  
**Cc:** Holston, William  
**Subject:** RE: Buried Piping Program Salem / Hope Creek

From OGC you lost that battle they you are making an independent conclusion – I better see the words support a conclusion of reasonable assurance and only in the cover letter of the report – not for each program, the artificiality of the application.

You can discuss all you want with licensee but if NRR doesn't accept it, we have no basis to say implementation supports a reasonable assurance determination.

A unified approach to the ACRS subcommittee is needed but I think you are pushing too hard, perhaps we should conference – my frank opinion.

When is the brief with Darryl next week; maybe then we invite Dave and Bill and conference.

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**From:** Modes, Michael , RY  
**Sent:** Wednesday, August 11, 2010 8:53 AM  
**To:** Conte, Richard; Pelton, David  
**Cc:** Holston, William  
**Subject:** RE: Buried Piping Program Salem / Hope Creek

The reviewer is not "in training" ...Bill is the former Director of Engineering at NMP and Calvert. He has more first hand knowledge in these areas than anyone, including me.

After you left, the applicant presented their proposal in response to the RAI. We talked at length about how this was going to be implemented. Their program now conforms, with some exceptions, to the GALL Rev 2 AMP. At Hope Creek they are actually going to inspect a lot more than we now would require because they have cathodic protection with records to support it going back at least 10 years. In many regards their proposal exceeds the commitments we just accepted from Cooper.

It is clear I have reasonable assurance the affects of aging are going to be managed. Tim O'hara agrees in principal.

Our inspection is an independent activity that arrives at an independent conclusion. The license review process continues no matter what we conclude. I don't consult DLR about the other dozen

AMPS we look at and DLR certainly does not consult me about my inspection results. Heck the PM puts the SER together without ever reading our inspection report!

If I delay I have to keep a section of the report open, explain this to the ACRS, and come up with a way of revisiting this subject after the ACRS meeting. I don't see any benefit in doing this. It certainly makes my job harder than it has to be at this point.

This is Exelon, they very clearly understand the process and the independence of the inspection and license review. Under no circumstances do they "believe they're being told that all is well."

**However if someone can give me a real basis for delaying the IP71002 process I would be willing to delay a discussion with the applicant about buried piping until the formal exit with the PSEG Sr. management on Thursday the 26th at 10 am.**

Connte, Richard *RC*  
**Sent:** Wednesday, August 11, 2010 6:50 AM  
**To:** Modes, Michael; Pelton, David  
**Cc:** Holston, William  
**Subject:** RE: Buried Piping Program Salem / Hope Creek

I tend to agree with Dave, what is the rush, the reviewer is in training, why are we bothering him.

Yesterday morning we were at an indeterminant status because of the uncertainty between applicant and NRR. What is the approach with the ACRS subcommittee in light of all this uncertainty.

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**From:** Modes, Michael *RC*  
**Sent:** Tuesday, August 10, 2010 8:06 PM  
**To:** Pelton, David  
**Cc:** Holston, William; Conte, Richard  
**Subject:** RE: Buried Piping Program Salem / Hope Creek

When can we talk?

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**From:** Pelton, David *MPR*  
**Sent:** Tuesday, August 10, 2010 6:49 PM  
**To:** Modes, Michael; Holston, William  
**Subject:** RE: Buried Piping Program Salem / Hope Creek

Mike and Bill,

I hate to be a party crasher, but I'm not prepared to support any final conclusions regarding the suitability of the Salem buried piping program...not yet, at least. While the inspection may indicate a number of positives related to actions completed to date, I don't want the applicant to believe they're being told that all is well and the proposed buried piping program is acceptable...thoughts?

dave p.

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**From:** Modes, Michael *RC*  
**Sent:** Tuesday, August 10, 2010 6:31 PM  
**To:** Holston, William  
**Cc:** Pelton, David  
**Subject:** RE: Buried Piping Program Salem / Hope Creek

Bill that was enormously helpful ... thanks.

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**From:** Holston, William *mw*  
**Sent:** Tuesday, August 10, 2010 6:26 PM  
**To:** Modes, Michael  
**Cc:** Pelton, David  
**Subject:** RE: Buried Piping Program Salem / Hope Creek

I have taken over the BP LRA SER input from Dave Alley. I won't be available until the evenings. I am at a cathodic protection course in Michigan. Here are my impressions of S/HC from reading their LRA and conducting a call with them last week. They have not yet replied to the BP RAI.

In comparison to GALL AMP 34, they stand out well. They are committing to inspect each material group that has in scope buried piping. I don't have my notes with me but I recall that is 22 inspections over the 30 - 40 and 40 - 50 time frame. They found their uncoated AFW piping because they were out looking and from their BPIG presentation and discussion in the call conducted an effective extent of condition which is continuing with the other unit in the next outage.

In regard to GALL AMP 41, due to their AFW issue, they actually stand in a reasonably good position there also.

Coatings - the AFW issue was a construction issue. I have not received their response yet but with the exception of the concrete pipe I believe everything is coated. Check mark there

Backfill Quality - they have done a lot of digging and have not discovered any back fill issues. Check mark there.

Hope Creek Cathodic Protection - as I recall no gaps at HC. They are conducting annual NACE surveys and the system is functional. For the RAI response we'll want to see them commit to 90% availability and continue the testing. If they make those commitments, check mark there.

Salem Cathodic Protection - they do not have any CP at Salem. I reviewed their LRA this evening to refresh my memory. On the plus side they have no HAZMAT buried pipe. I was surprised by that on fuel oil so I double checked and according to the LRA there is none. Even without HAZMAT piping, the AMP would drive to more inspections than they have committed to based on their given the lack of CP, but because of AFW they have exceeded the recommendations. Their SRW and AFW are code class/safety related. Their materials for the SRW system are concrete reinforced for which their current plan is adequate, one inspection and as I recall, there is only a small portion of CS piping. Their AFW system is carbon steel and the new GALL AMP requires four inspections of steel if no CP is provided. On an ironic note for them, based on their recent outage inspections for AFW and the planned inspections for the other unit, they will actually exceed the requirement for the non CP enhanced inspections in the ten year period prior to extended operation. So, based on the AMP commitments they don't meet AMP XI.M41, but based on the actual inspections they do meet the recommendations.

So in brief, I agree with you. If it is appropriate to mention or if they question you on the RAI during your debrief, please state that the staff is evaluating the fact that Salem has no CP and at HC we would like a commitment to maintain the CP system 90% available and conduct annual NACE testing. They pushed back on our last gap which is repeating the same number of tests in the 50 - 60 year time period. They want to credit the NEI Initiative to take them where they should be in the 50 - 60 year time period. The staff had not agreed to their position. I am not trying to push you to reinforce the headquarter message. You need to stay true to a 91002 exit brief script, but if it fits in and it is the right thing to do from your perspective, there it is.

Bill

The hotel number is 989-772-5500, I am in Room 205, but I don't think I will be back in the room until after 1830 on Wednesday. I hope the notes helped.

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**From:** Modes, Michael  
**Sent:** Tuesday, August 10, 2010 3:31 PM

**To:** Holston, William  
**Cc:** Pelton, David  
**Subject:** Buried Piping Program Salem / Hope Creek

I am at Salem Hope Creek on the last week of IP71002 inspection ending this Thursday afternoon.

I am guessing you took over the LR review from Dave Ali.

We are prepared to conclude reasonable assurance based on our review, experience with the buried AFW, and their proposal in response to the most recent RAI. If you look at all the details of the program they are going to implement, which was based on the EPRI guidance, it comes very close to AMP 41 as now written.

Before I debrief with the applicant on Thursday I would like to consult with you.

When would be a good time to discuss this?