

Conte, Richard

From: Gray, Harold
Sent: Tuesday, May 04, 2010 1:43 PM
To: Conte, Richard
Cc: OHara, Timothy
Subject: RE: Revised Debrief Notes

The words in the Code that requires an evaluation of flaws are in IWA 4000IWC-3000 and CC N-513-2..

From: Conte, Richard
Sent: Tuesday, May 04, 2010 12:24 PM
To: Gray, Harold
Subject: FW: Revised Debrief Notes

FYI

From: Conte, Richard *RI*
Sent: Tuesday, May 04, 2010 12:24 PM
To: Schroeder, Daniel; OHara, Timothy; Burritt, Arthur
Cc: Tsao, John
Subject: FW: Revised Debrief Notes

I am ok with Tim notes for now.

we are still looking for the words in the Code that requires an evaluation of structural integrity.

then again the information for Unit 2 is limited so more can they give us from what they already state in their Op Det. concl: structural integrity of unit 2 piping is sound.

we are interfacing with John Tsao in Headquarters before tomorrow.

John are you available to talk at 1245 before Tim does a debrief with PSEG at 115

From: OHara, Timothy *RI*
Sent: Tuesday, May 04, 2010 11:57 AM
To: Conte, Richard
Subject: Revised Debrief Notes

Rich,

The latest is attached.

Tim

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Vendor Account

NO3600

Salem Unit 1 ISI Debrief Notes:

Good Morning: I have completed the required samples in Inspection Procedure 7111108 and TI-172 for Salem Unit 1.

Inspection Result:

Preliminary SL-IV NOV – Failure to perform tests required by 10 CFR 50.55(a), and ASME IWA-5244 on both Salem Unit 1 and Salem Unit 2, when pressure tests were not conducted.

Remaining issues of concern. Yet to be screened: (See new 612 explanation – other enforcement actions may be appropriate)

(1) No record showing that Unit 1 or Unit 2 had the AFW pipes coated when installed. No record of how long the coatings were projected to last on Unit 1 or Unit 2. **(Required Records)**

- 10 CFR 50, App. B, Crit. III, Design Control
- 10 CFR 50, App. B, Crit. IV, Procurement
- 10 CFR 50, App. B, Crit. V, Instructions, Procedures, Drawings

(2) PSEG did not follow the plant's IWE procedure when the blisters were discovered in Unit 2 in October/November 2009. Therefore, they did not follow IWE. This was not entered into the corrective action process until April 2010. This is disappointing in view of the 2007 NOV for past ISI Program reporting problems.

(Failed to follow procedures.)
Reg. Guide 1.33 & IWE

(3) PSEG has not been able to explain the basis for the design pressure of 1950 psia for the AFW system. This is a design basis number which the licensee must be able to understand and explain. Despite this lack of knowledge, the past operability evaluation of Unit 1 derated the system design pressure to 1275 psia, in order to get a "use-as-is" answer. **(Lack of design basis)**

- 10 CFR 50, App. B, Crit. III, Design Control
- 10 CFR 50, App. B, Crit. V, Instructions, Procedures, Drawings

(4) PSEG was not able to define a coating life and a new inspection time for the replaced Unit 1 AFW buried piping. **(Engineering)**

- 10 CFR 50, App. B, Crit. III, Design Control
- 10 CFR 50, App. B, Crit. V, Instructions, Procedures, Drawings

(5) Unit 2 needs a structural integrity evaluation which conforms to ASME Code requirements for the potentially degraded AFW piping. **(Engineering)**

- (6) CA piping in the FTTA was found broken when examined and had experienced severe corrosion. The broken header was repaired and inspected. However, PSEG did not inspect or test the other CA header in the same area. **(Extent of condition)** (Probably minor item.)

PI&R Comments: The following examples highlight concerns about the use of the corrective action process:

- (1) U2 containment blisters were seen in 2009 but not entered into the corrective action process until 2010. ~~This doesn't seem to meet most expectations for timeliness.~~
- (2) Some now say that the Unit 1 AFW piping was not coated, however, this has not been entered into the corrective action process to my knowledge. This was known before the piping was replaced and may have had an effect on the engineering of the protective coating.
- (3) The new AFW piping coating design life is not known. This has not been entered into the corrective action process. No future inspection plans have been determined.
- (4) New coating recoat wait times not followed and not entered into the corrective action process.
- (5) New coating cure time of 3 – 5 days not followed and not documented in the corrective action process.
- (6) The design life of the original coating is not known and this information has not been entered into the corrective action process.
- (7) The outage buried piping sample plan was not representative because none of the piping in the FTTA was to be excavated and inspected.
- (8) Have not received verification that the cure time of the backfill was followed. This has not been entered into the corrective action process.
- (9) DCP and 50.59 for the AFW piping reroute in the FTTA discusses and assumes the presence of the missile shield. However, the shield is not presently installed and the condition has not been entered into the corrective action process.
- (10) The inability to explain the design basis for the AFW system design pressure of 1950 psia has not been entered into the corrective action process for explanation.

Open Issues:

- (1) Review of Unit 2 AFW structural integrity evaluation
- (2) Review of Unit 1 AFW Root Cause Evaluation
- (3) Review of answers to open Reg. Assurance questions

Administration:

This inspection will be a feeder to the resident report 50000272/2010003.

Thanks to everyone for their help in providing information and answering our questions.
Thanks for your assistance during the busy outage.

Any proprietary information during this inspection will be returned or destroyed before the feeder is published.

Are there any questions at this time?

Tim OHara