

Ziev, Tracey

From: OHara, Timothy
Sent: Tuesday, April 27, 2010 9:10 PM
To: Modes, Michael; Gray, Harold
Cc: Conte, Richard; Burritt, Arthur; Cline, Leonard; Schroeder, Daniel
Subject: Comments On 70108698 0110 Unit 1 AFW Past Operability Evaluation - Engineering

Here are my comments on the subject Evaluation. Please note that this document is not final, however, I was asked to review and comment on it. (Sorry, but I wasn't given an electronic copy of this document. Maybe Dan can get one tomorrow from PSEG.)

- (1) In general, the most glaring omission in the complete lack of discussion of the condition of the un-excavated piping in the fuel handling bldg. area (~80').
- (2) No discussion or facts are provided about the environment which caused the observed corrosion. In fact, the background section says that the Unit 1 piping fill (in the trench area) was not a harsh environment. But something caused the degradation of the piping. Also, the environment of the soil/sand in the fuel handling building area is not described or discussed.
- (3) The FEA follows the guidance of the ASME Code and is ok but again, it only covers the trench area. Very little is known about the buried piping in the fuel handling building area and I don't see evidence that a convincing argument is given that proves structural integrity in the fuel handling building area - especially the deep pipe runs.
- (4) This Evaluation gives a summary of the worst case UT measurements, however, only about half of the buried piping was actually UT'd. Most of the piping in the fuel handling building area has not been excavated or examined.
- (5) It should be noted that the 1" ID Control Air (CA) piping in the fuel handling building area was actually found to be leaking due to severe corrosion. This piping is safety related and has been repaired. No additional piping was excavated in this area which appears to be a harsh environment based upon the condition of the removed, damaged pipe. Additionally, there are 2 1" air headers and only one has been excavated to examine the condition in the fuel handling building area. The easily accessible CA piping in the trench area was examined extensively, UT'd and re-wrapped before being buried.
- (6) The FEA is well supported with real, qualified UT data. However, the FEA only covers the trench area - it does not include the buried piping in the fuel handling building area. So there is no convincing structural integrity analysis for the complete system including the fuel handling building area.

Tim OHara