

DiabloCanyonNPEm Resource

From: Ferrer, Nathaniel
Sent: Wednesday, October 27, 2010 11:42 AM
To: Grebel, Terence
Cc: DiabloCanyonNPEm Resource
Subject: Draft RAI Set 31 AMR follow-up
Attachments: Draft RAI Set 31 AMR follow-ups.doc

Terry,

Attached is Draft RAI Set 31 containing draft RAIs, specifically on portions of aging management review. Please review the attached draft RAIs and let me know if and when you would like to have a teleconference call. The purpose of the call will be to obtain clarification on the staff's request.

Please let me know if you have any questions.

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Recipients:

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Diablo Canyon Nuclear Power Plant, Units 1 and 2 (DCPP)
License Renewal Application (LRA)
Draft Request for Additional Information Set 31
Aging Management Review

D-RAI 3.3.2.3.5-1 (follow-up)

In LRA Tables 3.3.2-5 and 3.4.2-1, the applicant stated that carbon steel indicators, sight glasses, piping, pumps, tanks, and valves internally exposed to sodium hydroxide (NaOH) are being managed for loss of material by the Water Chemistry and One-Time Inspection Programs. The AMR line items cite generic note G and a plant specific note, which states “The use of carbon steel up to 200°F (93°C) and 50 wt percent NaOH is common in industrial applications with no special consideration for aging. The NaOH concentration is controlled by the Water Chemistry Program.”

By letter dated August 30, 2010, the staff issued RAI 3.3.2.3.5-1, and noted that EPRI primary and secondary water chemistry guidelines, which are the basis for GALL AMP XI.M2 “Water Chemistry,” do not include control parameters for managing NaOH used in auxiliary systems. The staff requested that the applicant describe the parameters being monitored and acceptance criteria for the sodium hydroxide solution being monitored by the Water Chemistry Program. In its response dated September 29, 2010, the applicant stated that the components exposed to NaOH are no longer in-service but have not been formally abandoned-in-place and therefore were assumed to contain liquid. The applicant did not include the parameters and acceptance criteria being monitored by the Water Chemistry Program.

Request

1. State the parameters being monitored, frequency of monitoring, and acceptance criteria for the NaOH solution.
2. Confirm that these parameters are being monitored by the Water Chemistry Program.
3. Justify the use of the One-Time Inspection Program to manage loss of material for these components given that GALL AMP XI.M32, “One-Time Inspection” is only to be used to verify the effectiveness of an aging management program, confirm the absence of an aging effect, or confirm that the aging effect is occurring slowly enough such that it will not affect the intended function of the component during the period of extended operation.