DiabloCanyonNPEm Resource

From: Pick, Greg
Sent: Wednesday, January 12, 2011 3:28 PM
To: DiabloCanyonNPEm Resource
Subject: FW: GALL Comparison
Attachments: GALL Comparison.doc

From: Terence Grebel [mailto:grebelj@charter.net]
Sent: Tuesday, December 21, 2010 10:04 PM
To: Pick, Greg
Cc: tlg1@pge.com; bnsm@pge.com
Subject: FW: GALL Comparison

From: Sizemore, Brandy [mailto:BNSM@pge.com]
Sent: Tuesday, December 21, 2010 5:09 PM
To: grebelj@charter.net
Subject: GALL Comparison

Hi Terry,

Attached is the comparison of our records and the NRC Regional Inspection Report.

Thanks
Brandy Sizemore

<<GALL Comparison.doc>>

Hearing Identifier: DiabloCanyon_LicenseRenewal_NonPublic
Email Number: 2416

Mail Envelope Properties (CA7A6E1C5CB1204FA832458074C4571BFF3318DE05)

Subject: FW: GALL Comparison
Sent Date: 1/12/2011 3:27:58 PM
Received Date: 1/12/2011 3:28:01 PM
From: Pick, Greg

Created By: Greg.Pick@nrc.gov

Recipients:
"DiabloCanyonNPEm Resource" <DiabloCanyonNPEm.Resource@nrc.gov>
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MESSAGE	501	1/12/2011 3:28:01 PM
GALL Comparison.doc	53314	

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Priority: Standard
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Summary of Differences

	LRA			Regional Inspection		
AMP	Consistent	Exceptions	Enhancements	Consistent	Exceptions	Enhancements
B2.1.6 - Flow Accelerated Corrosion		1		X		
B2.1.10 Closed Cycle Cooling Water System		5	2		5	1
B2.1.13 Fire Water System		2	3		1	3
B2.1.23 Lubricating Oil Analysis		1	6		1	4
B2.1.32 Structures Monitoring Program	X		3	X		2
B2.1.35 Electrical Cable Connections Not Subject to 10 CFR 50.49 EQ		2			1	
B2.1.36 Metal Enclosed Bus		1	1	X		1

Details

B2.1.6 – Flow Accelerated Corrosion

* The LRA shows that the FAC program has one exception and the Regional Inspection Report states that the program is consistent with the GALL report.

The following exception is from Appendix B of the LRA

Exceptions to NUREG-1801

Program Elements Affected

Scope of Program - Element 1 and Detection of Aging Effects - Element 4

NUREG-1801, Section XI.M17, states that the FAC program should be based on the recommendations in NSAC-202L-R2. The guidelines provided in the governing procedure are based on the recommendations provided in the EPRI Guideline NSAC-202L-R3. The third revision of NSAC-202L contains recommendations updated with the experience of members of the CHECWORKS Users Group (CHUG), plus recent developments in detection, modeling,

and mitigation technology. These recommendations are intended to refine and enhance those of the earlier versions, without contradiction, so as to ensure the continuity of existing plant FAC programs. The guidance contained in the third revision of NSAC-202L supersedes that contained in all prior versions of NSAC-202L.

B2.1.10 Closed-Cycle Cooling Water System

The LRA shows that we have 2 enhancements to this AMP and the Regional Inspection Report only discusses one of them.

The following is from Appendix B of the LRA and is an enhancement not discussed in the Regional Inspection Report:

Enhancements

Monitoring and Trending - Element 5

DCPP will monitor the corrosion of closed cooling water components by inspecting the condition of corrosion coupons installed in the system and perform internal inspections of select components within the systems. These methods will verify that wetted material exposed to the chemistry of the closed cooling water systems are not experiencing corrosion. The corrosion coupons are strips of metal (i.e. copper, carbon steel, stainless steel, etc) that are installed in the closed cooling water systems in a manner such that they are exposed to the cooling water. Periodically these coupons are removed and their condition can be evaluated. This inspection will provide DCPP indication if significant corrosion is occurring in the system. The material of these corrosion coupons is representative of most of the materials that are used in the system. For those components that do not have material represented by the corrosion coupons, internal inspections will be performed on those components, or other component with similar material, in order to monitor for corrosion.

B2.1.13 Fire Water System

* The LRA shows that we have two exceptions to this AMP and the Regional Inspection Report only discusses one of them.

The following is from Appendix B of the LRA and is an enhancement for this program:

Exceptions to NUREG-1801

Program Elements Affected

Scope of Program - Element 1

NUREG-1801 provides a program for managing carbon steel and cast iron components in fire water systems. The Fire Water System program also manages components made from copper alloy and stainless steel exposed to water in the fire water system. The fire water system includes these materials. Visual inspections, volumetric examinations, flushes and flow tests are appropriate methods for managing the aging effects for these materials and ensure the continuity of intended function.

B2.1.23 Lubricating Oil Analysis

The LRA shows that this AMP has 6 enhancements and the Regional Inspection only discusses 4 enhancements.

The following are enhancements listed in Appendix B of the LRA:

Monitoring and Trending - Element 5

DCPP will include trending in a new procedure.

Corrective Actions - Element 7

A new procedure will state actions to address conditions where action limits are reached or exceeded.

B2.1.32 Structures Monitoring Program

*The LRA shows 3 enhancements and the Regional Inspection only discusses 2 enhancements.

The following is an enhancement listed in Appendix B of the LRA:

Scope of Program – Element 1

Plant procedures will be enhanced to revise the scope of the structures Monitoring Program to include the administration building, the elevated walkway connecting the turbine building to the administration building, and the structural members that support the walkway.

B2.1.35 Electrical Cable Connections Not Subject to 10 CFR 50.49 Environmental Qualification

*The LRA shows that we have 2 exceptions and the Regional Inspection only discusses 1.

The following exception is from Appendix B of the LRA:

Detection of Aging Effects - Element 4

NUREG-1801, Section XI.E6, Element 4 specifies electrical connections will be tested at least once every 10 years. The Electrical Cable Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements program requires a one-time inspection of a representative sample of external electrical connections within the scope of license renewal. This one-time inspection will be performed prior to the period of extended operation, which is consistent with the proposed LR-ISG-2007-02.

B2.1.36 Metal Enclosed Bus

*The LRA shows that we have one exception and the Regional Inspection Report does not discuss any exceptions

The following is an exception listed in Appendix B of the LRA:

Exceptions to NUREG-1801

The bus segments are not wrapped with insulation or have boots, as is the non-segregated bus. Therefore, inspection of insulation and boots is not applicable. Most of the Isophase bus sections are welded together. Resistance checks or infrared inspections area not required for welded connections. There are 3 locations of bolted connections within the Isophase bus. These connections are inspected as part of Metal Enclosed Bus program. PG&E manages bolted connections at the ends of the isolated phase bus under the maintenance programs of the motor operated disconnect, the main unit transformers, and the auxiliary transformers. The bolted connections that are part of active components are not within the scope of this aging management program.