Entergy

Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
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April 22, 2011

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
Docket No. 50-293
License No. DPR-35

Pilgrim Nuclear Power Station (PNPS) License Renewal Application (LRA) Supplemental Information

REFERENCES:

1. Entergy Letter No. 2.06.003, to USNRC, "Entergy Nuclear Operations Inc., License No. DPR-35, License Renewal Application," dated January 25, 2006.

2. Summary of Telephone Conference Call Held on March 23, 2011, Between the USNRC and Entergy Nuclear Operations, Inc., Concerning the Pilgrim Nuclear Power Station License Renewal Application, dated April 11, 2011.

LETTER NUMBER: 2.11.031

Dear Sir or Madam:

On January 25, 2006, Entergy Nuclear Operations, Inc. (Entergy) submitted the License Renewal Application (LRA) for the Pilgrim Nuclear Power Station (PNPS) as indicated by Reference 1.

Attachment 1 to this letter provides supplemental information to the LRA to address questions discussed with the NRC staff on a teleconference held on March 23, 2011.

This letter contains no new regulatory commitments.

Should you have any questions or require additional information concerning this submittal, please contact Mr. Joseph R. Lynch at 508-830-8403.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 22nd, 2011.

Sincerely,

Joseph R. Lynch for

Stephen J. Bethay
Director Nuclear Safety Assurance

JRL/jl

A119
NRR

Attachments: 1. License Renewal Application Supplemental Information (3 Pages)

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Attachment 1 to Letter No. 2.11.031

Pilgrim Nuclear Power Station
License No. DPR-35 (Docket No. 50-293)

License Renewal Application

Supplemental Information
(3 Pages)

Pilgrim Nuclear Power Station
License Renewal Application - Supplemental Information

Entergy provides the following additional supplemental information to address questions discussed with the NRC staff on a teleconference held on March 23, 2011 regarding the following areas at Pilgrim Nuclear Power Station (PNPS).

- Inspection of Buried Pipe and Tanks
- Aging Management of Low Voltage Cables

DRAFT RAI Appendix A

Background

In a letter dated March 16, 2011, the applicant revised LRA sections associated with inspection of containment coatings, inspection of buried pipe and tanks, and aging management of low voltage cables.

Issue

The Updated Final Safety Analysis Report supplements for the LRA sections inspection of containment coatings, inspection of buried pipe and tanks, and aging management of low voltage cables do not reflect the changes; therefore the staff cannot confirm that the changes will become part of the current licensing basis for PNPS.

Request

Revise the UFSAR supplement to reflect the modifications to the programs associated with inspection of containment coatings, inspection of buried pipe and tanks, and aging management of low voltage cables as reflected in Entergy letters dated January 7 and 31, and March 16, 2011.

Response

The LRA UFSAR Section A.2.1.42 for Protective Containment Coatings was provided in Entergy Letter, 2.11.027, dated April 21, 2011.

The revised LRA UFSAR Section A.2.1.2 for Buried Piping and Tanks Inspection Program is provided as follows:

A.2.1.2 Buried Piping and Tanks Inspection Program

The Buried Piping and Tanks Inspection Program include; (a) preventive measures to mitigate corrosion and (b) inspections to manage the effects of corrosion on the pressure-retaining capability of buried carbon steel, stainless steel, and titanium components. Preventive measures are in accordance with standard industry practice for maintaining external coatings and wrappings. Buried components are inspected when excavated during maintenance.

Prior to the Period of Extended Operation (PEO) PNPS will excavate and inspect the entire circumference of the following buried carbon steel pipe systems:

- 30 feet of Station Blackout (SBO) Diesel fuel oil piping and 20 feet of SBO coolant piping.
- 30 feet of the Emergency Diesel Generator (EDG) fuel oil pipe.
- 20 feet of the Standby Gas Treatment System (SBGTS) pipe.

These inspections will be conducted at least once every ten years during the PEO. If measured soil resistivity is <20,000 ohms or scores higher than 10 points using the American Water Works Association C105, or if backfill is found to have damaged the coating, the length of SBGTS pipe inspected will be doubled during subsequent ten (10) year inspections.

The two buried carbon steel EDG fuel oil tanks will be inspected prior to the PEO, and on a ten (10) year interval following the PEO.

If trending within the corrective action program identifies susceptible locations, the areas with a history of corrosion problems are evaluated for the need for additional inspection, alternate coating, or replacement.

The revised LRA UFSAR Section A.2.1.21 Non-EQ Inaccessible Medium-Voltage Cable Program is provided as follows:

A.2.1.21 Non-EQ Inaccessible Medium-Voltage Cable Program

The Non-EQ Inaccessible Medium Voltage Cable Program is based on, and consistent with NUREG-1801, Rev 2, section XI.E3. In scope, inaccessible medium-voltage and low-voltage (400V to 35KV) cables exposed to significant moisture are tested at least once every six years to provide an indication of the condition of the insulation. Significant moisture is defined as periodic exposures that last more than a few days. The specific test performed is a proven test for detecting deterioration of the insulation, such as power factor, partial discharge, polarization index, or other testing that is state-of-the-art at the time the test is performed. Evaluation of the test results are used to determine the need for increased test frequencies.

Inspections for water collection in cable manholes and conduit containing in scope medium and low voltage cables with a license renewal intended function (400V to 35KV) occur at least once every year. Additional condition-based inspections of these manholes are performed based on natural events for a coastal site. The results of the inspections are reviewed to determine if the inspection frequency, and/or testing frequency should be modified.