

IPRenewal NPEmails

From: Kuntz, Robert
Sent: Monday, June 06, 2011 2:16 PM
To: MSTROUD@entergy.com
Cc: IPRenewal NPEmails
Subject: Draft RAIs
Attachments: DRAI 3.docx

Mike,

Attached are draft RAIs. Please review and let me know if you need a telephone conference call to discuss them. The purpose of the call would be to obtain any clarification on the draft RAI.

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Hearing Identifier: IndianPointUnits2and3NonPublic_EX
Email Number: 2611

Mail Envelope Properties (94A2A4408AC65F42AC084527534CF4166C8FF575EB)

Subject: Draft RAIs
Sent Date: 6/6/2011 2:15:55 PM
Received Date: 6/6/2011 2:15:59 PM
From: Kuntz, Robert

Created By: Robert.Kuntz@nrc.gov

Recipients:
"IPRenewal NPEmails" <IPRenewal.NPEmails@nrc.gov>
Tracking Status: None
"MSTROUD@entergy.com" <MSTROUD@entergy.com>
Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	Size	Date & Time
MESSAGE	328	6/6/2011 2:15:59 PM
DRAI 3.docx	19957	

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

D-RAI 3.0.3.1.2-2

BACKGROUND

The response to RAI 3.0.3.1.2-1 dated March 28, 2011, proposed to manage the effects of aging for buried steel propane piping and tanks within the scope of license renewal by monitoring tank level. License renewal application (LRA) Section 2.3.3.15 states that the license renewal function of these components is to provide a pressure boundary. NUREG-1800, "Standard Review Plan for License Renewal" (SRP-LR), Rev. 1, Section A.1.2.3.4, item 2, states that a program based solely on detecting structure and component failure is not considered an effective aging management program for license renewal.

ISSUE

In order to detect the effects of aging via a change in tank level, the license renewal pressure boundary function would already have had to fail (i.e., leak). Consistent with the SRP-LR, this methodology should not be considered an effective aging management program.

REQUEST

Explain the basis for concluding that monitoring the propane tank level provides reasonable assurance that the license renewal pressure boundary function of the tank and piping is met.

D-RAI 3.0.3.1.2-3

BACKGROUND

The response to RAI 3.0.3.1.2-1 dated March 28, 2011, revised the number and frequency of buried pipe inspections and stated the number and frequency of soil testing to determine corrosivity of the soil in the vicinity of in-scope buried pipe.

Title 10 of the *Code of Federal Regulations* (10 CFR) 54.21(d) states, in part, that the FSAR supplement must contain a summary description of the programs and activities for managing the effects of aging. SRP-LR 3.3.2.4, Rev. 1, states in part that the summary description of the programs and activities for managing the effects of aging for the period of extended operation in the FSAR Supplement should be sufficiently comprehensive such that later changes can be controlled by 10 CFR 50.59, and the description should contain information associated with the bases for determining that aging effects will be managed during the period of extended operation.

ISSUE

The UFSAR supplement does not reflect the planned number and frequency of buried in-scope piping inspections and soil testing to be conducted during the thirty-year period starting ten years prior to the period of extended operation.

REQUEST

Revise the UFSAR supplement to reflect the number and frequency of buried in-scope piping inspections and soil testing to be conducted during the thirty-year period starting ten years prior to the period of extended operation.

D-RAI B.1.4-1

BACKGROUND

LRA Section B.1.4 states that the Boral Surveillance Program measures physical and chemical properties of sample coupons at specified intervals. Sufficiently detailed information as to the inspection and testing intervals, and how they account for plant-specific operating experience has not been provided

10 CFR 54.21(d) states, in part, that the FSAR supplement must contain a summary description of the program and the activities for managing the effects of aging. SRP-LR 3.3.2.4, Rev. 1, states that the summary description of the programs and activities for managing the effects of aging for the period of extended operation in the FSAR supplement should be sufficiently comprehensive such that later changes can be controlled by 10 CFR 50.59, and the description should contain information associated with the bases for determining that aging effects will be managed during the period of extended operation.

ISSUE

The license renewal application description of the Boral Surveillance Program does not discuss the frequency of inspection and testing activities to be performed during the period of extended operation and how they will be adequate to manage the aging effects of loss of material and loss of neutron-absorbing capability. Additionally, the UFSAR supplement does not reflect the planned number and frequency of inspections and testing.

REQUEST

1. State how often Boral inspection and testing activities will be conducted during the period of extended operation and, if the inspection and testing interval exceeds 10 years, explain why the frequency is adequate to manage the aging effects of loss of material and loss of neutron-absorbing capability.
2. Revise the UFSAR Supplement to reflect the number and frequency of inspections and testing to be conducted during the period of extended operation.