

## Davis-BesseNPEM Resource

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**From:** CuadradoDeJesus, Samuel  
**Sent:** Tuesday, June 28, 2011 1:16 PM  
**To:** 'dorts@firstenergycorp.com'  
**Cc:** 'custerc@firstenergycorp.com'  
**Subject:** Concerns to discuss in future Teleconference call

### TECHNICAL ISSUE

#### 1 TRP 21 OCCW

FYI, Davis-Besse's RAI response letter dated May 24, 2011, included a change to the One-Time Inspection Program by adding cracking of copper alloy in raw water. Initially DB had proposed using the Open Cycle Cooling Water Program and when we questioned what inspection method would be used, they responded by saying they were changing it to OTI and revised the LRA. This new OTI approach to a non-consistent environment such as raw water is not prudent.

Mintz is proposing a new RAI (see below) which probably should be coming from the OTI AMP, instead of the OCCW AMP. Since several RAIs have caused DB to modify the OTI program, it seems that the overall adequacy of the OTI needs to be reviewed to ensure consistency between the various programs (like fire water) that will now be using OTI.

#### 2 TRP 79 Elastomers

GALL AMP XI.M38 - For flexible materials to be considered acceptable, the inspection results should indicate that the flexible polymer material is in "as new" condition (e.g., the hardness, flexibility, physical dimensions, and color of the material are unchanged from when the material was new).

#### 3 TRP 78 Diesel exhaust piping

In response to RAIs 3.3.2.2.3.3-1 and 3.3.2.71-2, the applicant is committing to the plant-specific Inspection of Internal Surfaces in Miscellaneous Piping and Ducting due to SCC of stainless steel diesel engine exhaust piping, piping components, and piping elements exposed to diesel exhaust. The applicant's proposed AMP relies on opportunistic inspections. The key issue is inspection frequency. The equivalent AMP (XI.M38) in the GALL Rev. 2 report does not specify an inspection frequency, instead, recommends a plant-specific inspection frequency based upon operation. Let's discuss.

I'll try to schedule the conference call for tomorrow

### **Samuel Cuadrado de Jesús**

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