LimerickNPEm Resource

From: Kuntz, Robert
Sent: Tuesday, May 01, 2012 2:19 PM
To: Anthony Z. Roisman; gfettus@nrdc.org
Cc: Smith, Maxwell; Kanatas, Catherine
Subject: FW: DRAFT Request for Information
Attachments: DRAFT Buried piping and FP follow up RAI.docx

From: Kuntz, Robert
Sent: Tuesday, March 20, 2012 2:57 PM
To: 'Christopher.Wilson2@exeloncorp.com'
Subject: DRAFT Request for Information

Chris,

Attached is a DRAFT Request for Information related to the Limerick Generating Station License renewal request. If Exelon would like clarification on the attached let me know and I can set up a teleconference with the NRC staff.

Robert Kuntz
Sr. Project Manager
NRR/ADRO/DLR/RPB1
(301) 415-3733
robert.kuntz@nrc.gov

Hearing Identifier: Limerick_LR_NonPublic
Email Number: 227

Mail Envelope Properties (Robert.Kuntz@nrc.gov20120501141800)

Subject: FW: DRAFT Request for Information
Sent Date: 5/1/2012 2:18:37 PM
Received Date: 5/1/2012 2:18:00 PM
From: Kuntz, Robert

Created By: Robert.Kuntz@nrc.gov

Recipients:
"Smith, Maxwell" <Maxwell.Smith@nrc.gov>
Tracking Status: None
"Kanatas, Catherine" <Catherine.Kanatas@nrc.gov>
Tracking Status: None
"Anthony Z. Roisman" <aroisman@nationallegalscholars.com>
Tracking Status: None
"gfettus@nrdc.org" <gfettus@nrdc.org>
Tracking Status: None

Post Office:

Files	**Size**	**Date & Time**
MESSAGE	518	5/1/2012 2:18:00 PM
DRAFT Buried piping and FP follow up RAI.docx	23687	

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

DRAI B.2.1.17-3.1

Background

The “detection of aging effects” program element of GALL Report AMP XI.M26 states that visual inspections are performed by fire protection qualified personnel of fire barrier penetration seals, walls, ceilings, floors, doors, and other fire barrier materials. LRA Section B.2.1.17 states that the personnel performing inspections are qualified and trained to perform the inspection activities. However, the staff noted that the personnel responsible for performing fire barrier inspections are maintenance qualified personnel; not fire protection qualified personnel. By letter dated January 17, 2012, the staff issued RAI B.2.17-3 requesting that the training and qualifications of the personnel responsible for performing fire barrier inspections be described.

The response to RAI B.2.17-3, provided by letter dated February 15, 2012, stated that inspections are typically performed by personnel who are qualified by training and demonstration of installation and repair of fire barriers, the purpose of fire barriers, fire barrier types, and materials of construction, and that these typically qualified personnel inspect both new and repaired fire barriers.

Regulatory Guide 1.189, “Fire Protection for Nuclear Power Plants,” states that personnel responsible for maintaining and testing fire protection systems should be qualified by training and experience for such work. The LRA does not discuss whether the personnel responsible for performing the inspections have been trained to identify fire barrier deficiencies.

Issue

It is not clear to the staff how the program will ensure only personnel who are trained and qualified to identify fire barrier deficiencies are assigned to perform fire barrier inspections given that the personnel are only typically qualified and that the typical qualifications do not include training in the identification of fire barrier deficiencies.

Request

1. Explain the minimum qualifications required for the personnel performing fire barrier inspections, not the typical qualifications.

2. Explain how the program will ensure that only personnel trained and qualified to identify fire barrier deficiencies are assigned to perform fire barrier inspections.

DRAI B.2.1.29-2.1

Background

During its audit, the staff noted that the Buried and Underground Piping and Tanks program states that adverse conditions detected during inspections will be evaluated and the potential inspection expansion will be determined in accordance with the corrective action program.

The staff issued RAI B.2.1.29-2 requesting that the applicant state the basis for how the corrective action program inspection expansion size will be consistent with GALL Report AMP XI.M41, or state why the corrective action inspection expansion size will be sufficient to detect degradation prior to it causing an in-scope component to not be capable of meeting its current licensing basis function(s).

The response to RAI B.2.1.29-2 stated that:

> The LGS Buried and Underground Piping and Tanks aging management program enhancement is revised to include criteria such that if adverse indications are detected during inspection of inscope buried piping, inspection sample sizes within the affected piping categories are doubled. If adverse indications are found in the expanded sample, the inspection sample size is again doubled. This doubling of the inspection sample size continues as dictated by the corrective action program. This criterion is in accordance with GALL Report AMP XI.M41, "Buried and Underground Piping and Tanks."

Issue

The response states, in part that, "[t]his doubling of the inspection sample size continues as dictated by the corrective action program." It is not clear to the staff what is intended by the wording associated with the corrective action program. GALL Report AMP XI.M41, section 4.f.iv states that, "[i]f adverse indications are detected, inspection sample sizes within the affected piping categories are doubled. If adverse indications are found in the expanded sample, the inspection sample size is again doubled. This doubling of the inspection sample size continues as necessary." It is not clear if the corrective action program would require doubling of the inspection sample size until a subsequent set of inspections detected no adverse conditions.

Request

State whether the corrective action program would require doubling of the inspection sample size until a subsequent set of inspections detected no adverse conditions, and if not, state the basis for consistency with GALL Report AMP XI.M41, or state the basis for why the expanded scope of inspections have identified the extent of condition and extent of cause of the adverse condition.