

LimerickNPEM Resource

From: Kuntz, Robert
Sent: Friday, June 08, 2012 9:49 AM
To: Christopher.Wilson2@exeloncorp.com
Cc: Anthony Z. Roisman; gfttus@nrdc.org; Smith, Maxwell; Kanatas, Catherine
Subject: DRAFT Request for Information RE: Limerick Generating Station license renewal application
Attachments: LGS LRA DRAFT followup RAI on RWCU pump and OpE.docx

Chris,

Attached is a DRAFT Request for Information that the NRC staff is preparing to issue related to the Limerick Generating Station license renewal application. If Exelon would like clarification on the attached let me know and I will arrange a teleconference with the staff.

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Hearing Identifier: Limerick_LR_NonPublic
Email Number: 250

Mail Envelope Properties (Robert.Kuntz@nrc.gov20120608094900)

Subject: DRAFT Request for Information RE: Limerick Generating Station license renewal application
Sent Date: 6/8/2012 9:49:05 AM
Received Date: 6/8/2012 9:49:00 AM
From: Kuntz, Robert
Created By: Robert.Kuntz@nrc.gov

Recipients:

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Post Office:

Files	Size	Date & Time
MESSAGE	401	6/8/2012 9:49:00 AM
LGS LRA DRAFT followup RAI on RWCU pump and OpE.docx		30758

Options

Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
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- 2 -
LIMERICK GENERATING STATION
LICENSE RENEWAL APPLICATION
DRAFT REQUESTS FOR ADDITIONAL INFORMATION

DRAI 3.3.2.1.10-1

Background

SRP-LR Table 3.3.1, item 3.3.1-69, recommends that copper alloy components exposed to fuel oil be managed for loss of material by GALL Report AMPs XI.M30, "Fuel Oil Chemistry," and AMP XI.M32, "One-Time Inspection." However, item 3.3.1-69, states, "[t]he Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components (B.2.1.26) program has been substituted and will be used to manage the loss of material in the copper alloy valve bodies associated with dirty fuel oil drain piping in the Emergency Diesel Generator System."

LRA Table 3.3.1, item 3.3.1-70 states that the Fuel Oil Chemistry program and One-Time Inspection program will be used to manage the loss of material in carbon steel piping, piping components, and piping elements, and tanks exposed to fuel oil in the emergency diesel generator system. However, Item 3.3.1-70 states that "[t]he Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components (B.2.1.26) program has been substituted and will be used to manage the loss of material in the carbon steel Dirty Fuel Oil Drain Tank and dirty fuel oil drain piping in the Emergency Diesel Generator System."

GALL Report AMP XI.M32 recommends that inspections should focus on locations that are isolated from the flow stream, that are stagnant, or have low flow for extended periods and are susceptible to the gradual accumulation or concentration of agents that promote certain aging effects. It also recommends that inspections will include a representative sample size of 20 percent of the population (defined as components having the same material, environment, and aging effect combination), or a maximum of 25 components. These inspections can commence prior to the period of extended operation or be conducted early in the period of extended operation.

GALL Report AMP XI.M38 recommends that inspections be performed during the periodic system and component surveillances or during the performance of maintenance activities when the surfaces are made accessible for visual inspection.

Issue

Given that the Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components program has been substituted for the One-Time Inspection program, it is unclear to the staff that the minimum number of inspections recommended by the GALL Report will be performed. In addition, the inspections conducted by the One-Time Inspection program would have commenced prior to the period of extended operation or been conducted early in the period of extended operation, while those conducted by the Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components program will be conducted during the period of extended operation. It is unclear to the staff how the timing of inspections of the latter program is sufficient.

Requests

State the basis for why it is acceptable to substitute the Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components program in place of the One-Time Inspection, given that the number and timing of inspections conducted by the Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components program may not be sufficient to ensure that the intended function(s) of the components within the scope of license renewal will be met in the period of extended operation.

DRAI B.1.4-2

Background

Request for additional information (RAI) B.1.4-1, issued on February 16, 2012, requested a description of the programmatic activities that will be used to continually identify aging issues, evaluate them, and as necessary, enhance the aging management programs (AMPs) or develop new AMPs for license renewal. The response dated March 13, 2012, provided additional information regarding the Limerick Generating Station (LGS) Operating Experience program.

On March 16, 2012, the NRC issued LR-ISG-2011-05, "Ongoing Review of Operating Experience" to clarify the staff's position that license renewal AMPs should be informed, and enhanced when necessary, based on the ongoing review of both plant-specific and industry operating experience.

Issue

The response to B.1.4-1 described LGS's plant-specific programmatic framework for considering operating experience. However, in reviewing aspects of the LGS program against the guidance set forth in LR-ISG-2011-05, the staff needs further clarification on the implementation timeframe of the proposed enhancements.

Request

Where the March 13, 2012, response states that enhancements to the Operating Experience program "will be implemented prior to the period of extended operation," provide further clarification regarding the approximate timeframe this would take place with respect to the period of extended operation. Include any relevant practical consideration that would impact the implementation timeframe.