United States Nuclear Regulatory Commission Official Hearing Exhibit

In the Matter of:

Entergy Nuclear Operations, Inc.

(Indian Point Nuclear Generating Units 2 and 3)

**ASLBP #:** 07-858-03-LR-BD01 Docket #: 05000247 | 05000286 Exhibit #: ENT000439-00-BD01

Admitted: 10/15/2012

Rejected: Other: Identified: 10/15/2012

Withdrawn: Stricken:

ENT000439

Submitted: March 30, 2012

ENTERGY	ENGINEERING STANDARD	EN-EP-S-002-MULTI	REV. 0
2.112.101	Buried Piping and Tanks General Visual Inspection	PAGE 12 OF 12	

ATT	ACHMENT 7.	1			INSPECTION CHECKLIST			
She	et 1 of 3							
Piping / Tank		IP2 Service Water 24-inch Line 408 (WO # 279576-02)		INSF	PECTION E:	11/22/2011		
ELE	VATION:	pipe c-line @ EL. 8'-6"; grade @ El. 15' (approx.)	LOCATION DWG:	9321-2700 (Zone B-3)	INSPECTOR:		M. Terpening	
							NOTE	
1.	ANY BLISTE	RING (COATING)?		YES YES	№ □	at elbow intra	ados	
2.	ANY PEELIN	IG (COATING)?		$\boxtimes$	№ □	at elbow intra	ados	
3.	ANY FLAKIN	IG (COATING)?		YES YES	ио □	at elbow intra	ados	
4. ANY DELAMINATION (COATING)?			G)?	$\boxtimes$	NO 🗌	at elbow intra	ados	
5.	ANY EMBRI	TTLEMENT (COATI	NG)?	YES YES	№ □	at elbow intra	ados	
6. ANY EMBEDDED ROCKS (COATING A			TING AND/OR METAL)?		ио ⊠			
7.	7. ANY CRACKING (COATING AND/OR METAL)?		D/OR METAL)?	YES YES	NO 🗌	at elbow intra	ados	
8. ANY RUST (METAL)?				NO 🗌	n/a			
9.	ANY CORRO	OSION (METAL)?		YES YES	№ 🗌	n/a		
10.	0. ANY FLAKING OR SCALING (METAL)?				NO 🗌	n/a		
11.	. ANY MECHANICAL DAMAGE (METAL)?		YES YES	№ □	n/a			
12.	2. ANY NICKS, GOUGES OR ARC STRIKES (METAL)?			№ □	n/a			
13.	ANY TUBER	CLES (METAL – IF	INTERNAL INSPECTION)	? \( \sum_	№ □	n/a		

#### GENERAL APPEARANCE (Inspector):

Approx. 12 linear feet of piping was inspected, including horizontal and vertical sections and including 90 degree elbow. In general, the coating on the straight horizontal & vertical sections of piping was uniformly applied and was in good condition. The coating at the access point branch connect also looked acceptable. The coating at the elbows, however, looked to have been applied non-uniformly, and in some spots, excessively. Perhaps resulting in poor cure, air gaps, etc. Recommend that coatings engineer (currently not available) inspect the coating.

The full circumference of the horizontal sections of the 24-inch piping was generally in good condition. The edges of the overlapping layers of outer wrap were sealed with coating material.

There were no obvious sign of missing or degraded coating, except for the following: (see attached photo documentation)

- Line 408 (river side) had one area (approx. 4 sq. in) on the underside of the straight section of pipe that separated from the pipe and came off with the application of moderate finger pressure.
- Line 408 90 deg elbow, at the intrados, had an area of coating that had separated from the pipe and came apart upon application of finger pressure. When probed the area of coating that had come off was estimated to be approx. a one ft. square.
- The coating at the access point branch connections appeared to be carefully and methodically applied, although there was incomplete tape adhesion at the tape edges, and tape was not adhered to the pipe at the elbow to horizontal pipe transition.

# **ENTERGY**

## **ENGINEERING STANDARD**

EN-EP-S-002-MULTI

REV. 0

Buried Piping and Tanks General Visual Inspection

**PAGE 12 OF 12** 

ATTACHMENT 7.1		INSPECTION CHECKLIST			
Sheet 2 of 3					
	DEGRADATION FOU	ND?	YES 🛛	№ □	CR-IP2-2011-06248
	FURTHER EVALUATION	ON REQUIRED?	YES 🗌	NO 🗌	
<ol> <li>The initial inspection for additional inspect and be noted that the page 14-inch blind flang</li> </ol>	on was performed on 11/23, ion comments by the Under piping was excavated for me ged access point, and install	11, with a subsequent inspection of Piping & Tank properties of EC 25313 (2R20 mod) is larger 20-inch blind flanger	pection by the congram engineer a which installs a ged access point	patings engineer and the Coatings concrete vault at in SW Line 409	SW Line 408, excavated under mod EC performed on 12/1/11. See attached essengineer.  By performed on 12/1/11. See attached essengineer.  By A similar mod will modify SW Line ect to future soil/pipe corrosion
INSPECTOR(S) F	PRINT/SIGN/DATE:	M. Terpening			haf A June
EVALUATION:	ACCEPTABLE	ACCEPTABLE W	ITH DEFICIEN	CIES 🛚	UNACCEPTABLE
RECOMMENDED	ACTION (Program Owr	er):			
re-coate trending soil), bu	ed / wrapped. The result g and evaluation. As this	s of this inspection will b piping, following installa	e captured in t	the Underground 25313 will no	elbow is to be stripped of its coating nd Piping & Tank Program database o longer be buried (i.e., in contact wi d in conjunction with direct UT and
piping s		ne excavated area will n			cover. The horizontal and vertical ne installation of the concrete vault.
FUTURE MONITO	ORING:				
None re	equired for this specific lo	cation, as it will not long	er be subject t	o soil/pipe con	rosion effects. Additional piping
Inspect	ion(s) of the Service Wat	er system will be perfor	ned, as require	ed to meet UP	T program requirements.
	AINTENANCE:	o be address under mod	1161		Dravationa

B	ENTERGY	ENGINEERING STANDARD	EN-EP-S-002-MULTI	REV. 0	
		Buried Piping and Tanks General Visual Inspection	PAGE 12 OF 12		

ATTACHMENT 7.1	INSPECTION CHECKLIST			
Sheet 3 of 3				
CORRECTIVE ACTIONS:				
None				
	(* C			
PHOTOGRAPHIC OR VIDEO RECORDS ATTACHED?	YES NO			
	Robert C Ven 12/15/201			
PROGRAM OWNER PRINT/SIGN/DATE: Robert C. Lee				

# INSPECTION NOTES BY PROGRAM OWNER

Lee, Robert C

From: Lee, Robert C

Sent: Wednesday, November 23, 2011 3:33 PM

To: Azevedo, Nelson F; Guarnaccia, Stephen; Tesoriero, Michael V

Cc: Beasley, Thomas J; DeChristopher, Mike; Tesoriero, Michael V; Peterson, Joseph F;

Vasely, Michael J; Terpening, Michael; Kempski, Michael

Subject: SW Line 408 & 409 Visual Inspection - As-Found Coating Condition - In a nutshell

**Attachments:** IMG\_0623.jpg; IMG\_0585.jpg; IMG\_0621.jpg; IMG\_0628.jpg; IMG\_0609.jpg;

IMG\_0606.jpg; IMG\_0604.jpg; IMG\_0613.jpg; IMG\_0614.jpg; IMG\_0624.jpg;

IMG\_0625.jpg; IMG\_0626.jpg

Mike Terpening conducted the visual as-found inspection of the coating of SW Lines 408 & 409 at the access point mod excavation on Wed afternoon.

I'd like Steve Guarnaccia to examine the areas of the piping that exhibited degraded coating condition, as detailed below, next week. A CR should be will be written after the follow-up coating inspection.

In general, it looked like the coating on the straight section was uniformly applied and is holding up. The Coating at the access point branch connect also looked OK. The coating at the elbows, however, looked to have been applied non-uniformly, and in some spots, excessively. Perhaps resulting in poor cure, air gaps, etc. Need Steve G. to inspect and weigh in.

Mike Kempski - see bottom for 26 CWP discharge pipng photos.

The following is a summary of the inspection, additional photos are available:

The horizontal sections (tops and bottoms) of the two 24-inch headers were generally in good condition. The layers of overwrap could be seen with a layer of coating to seal the edges of the edges of the overwrap.

IMG\_0623.jpg (680 KR)



IMG\_0585.jpg (733 KB)



IMG\_0621.jpg (405 KB)

There were no obvious sign of missing or degraded coating, except for:

 On Line 408 (river side) have one area (approx. 4 sq. in) on the underside of the straight section of pipe that separated from the pipe and came off with the application of moderate finger pressure.



IMG\_0628.jpg (639

 Line 408 90 deg elbow, at the inner radius, had an area of coating that had separated from the pipe and came apart upon application of finger pressure. When probed the area of coating that had come off was estimated to be approx. a one ft. square.



IMG\_0609.jpg (527 KB)

The coating at the access point branch connections appeared to be carefully and methodically applied, although there was incomplete tape adhesion at the edges on Line 408.



The quality of the Line 409 coating and wrap at the access point branch connection was slightly, but noticeably better.



The bolting hardware at the access point blind flanges for Line 408 was corroded. Picture of 409 acces pt also provided.



Also exposed was the adjacent 26 Circ Water Discharge pipe (84-in. dia.) Although formal inspection was not conducted (I want to have it performed next week, while the excavation remains open) the exposed coating looked good



Bob

# Lee, Robert C

# COATINGS ENGINEER

From: Guarnaccia, Stephen

Sent: Thursday, December 01, 2011 11:11 AM

To: Culeton, Thomas

Cc: Beasley, Thomas J; Lee, Robert C; Pineda, Juan J; Drake, Richard S; Skonieczny, John F;

Arcate, John

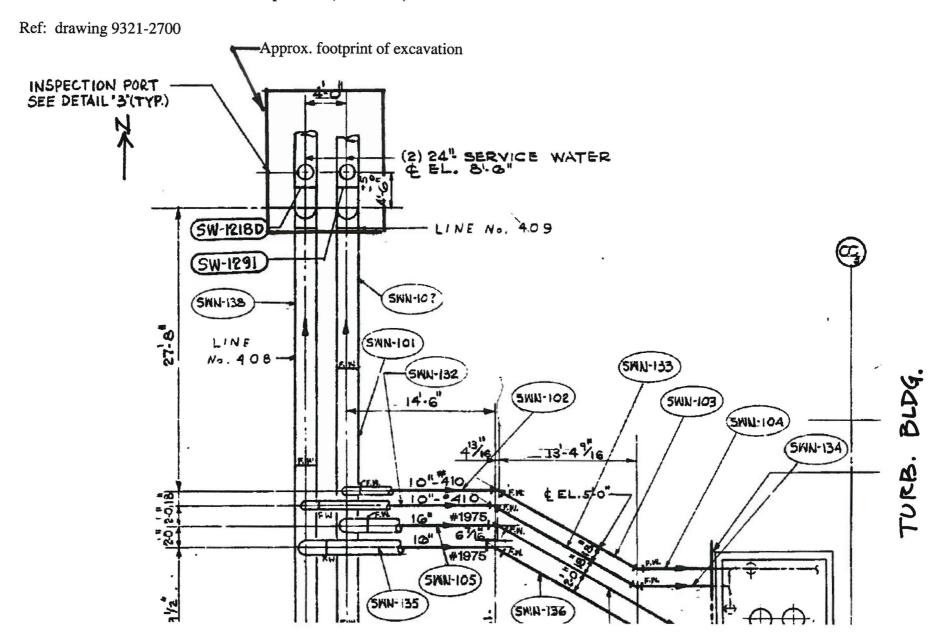
Subject: Service Water Piping Coating

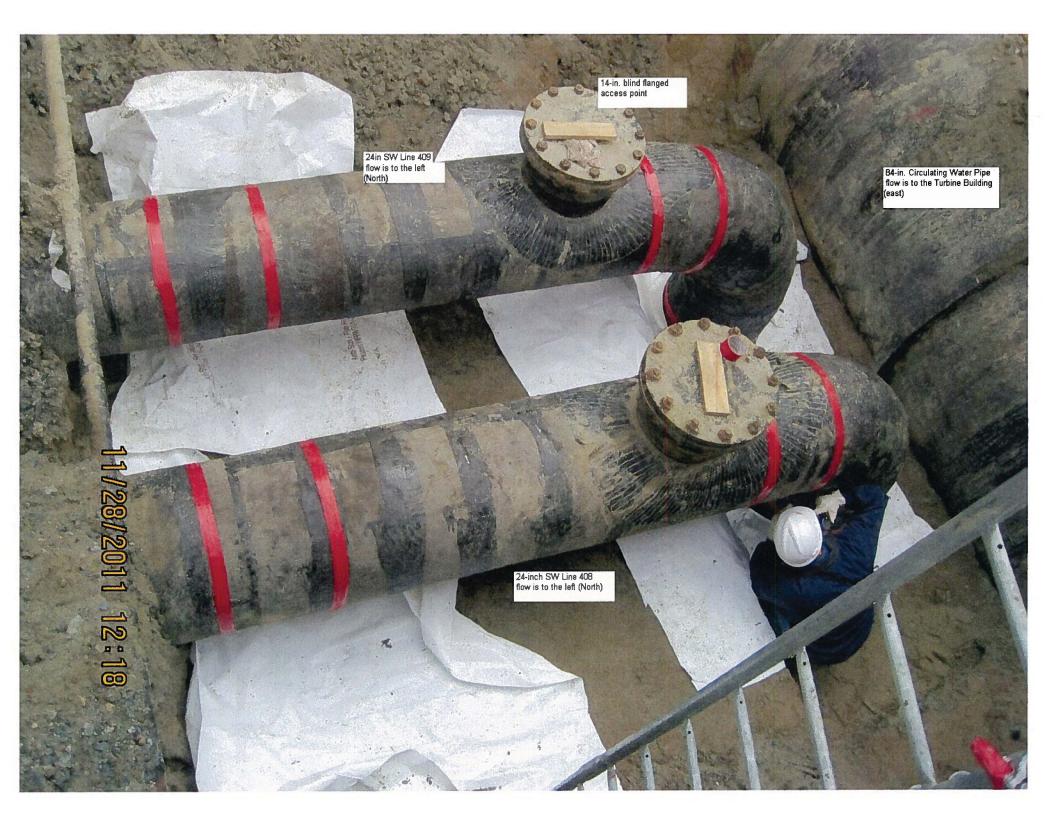
### Tom,

I inspected the coatings on service water lines 408 & 409 in the excavation on the riverfront. For the most part the coatings are in fairly good shape. My main concern is for the condition of the elbow on Line 408, riverside pipe, for the proper application of a coating repair. Thus this elbow needs to be stripped of the existing coating and wrap down to the pipe. The condition of the surface shall be roughened for the application of the new coating repair system. The inspection sites and the adjacent several inches of coatings shall also be roughened for the acceptance of the new coating.

Since the temperatures are trending down below 50 deg. F the standard system of coating can not be used. I'm referring to the Carboline 300M product which will not cure at these lower temperatures. Carboline has suggested the use of Carbomastic 615 which has not been previously used here on site. The VOC content is acceptable but the coating will need to be approved for use by Chemistry. I will generate the paperwork to add the 615 to the ACL today.

Thanks for your support, Steve x6609



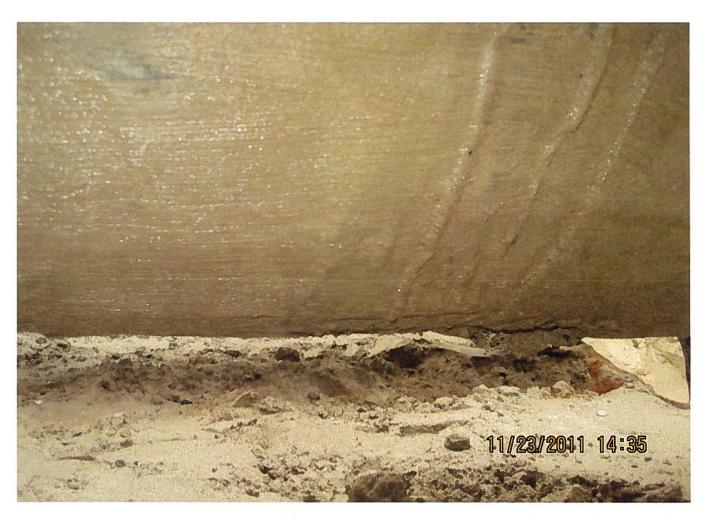




NORTH END, LOOKING EAST I DOWN I SECTION IMMEDIATELY DISACCES PT. LICE EAST 120 MM PAIN 785-172

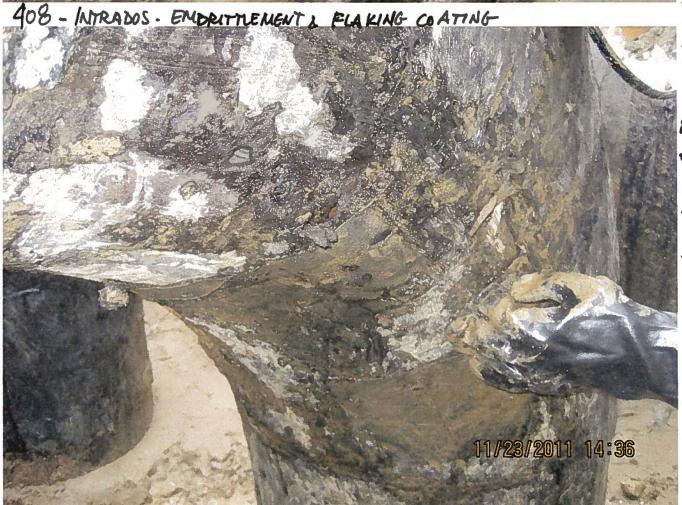




















LINE 408 INTRADOS





12/5 OF LINEADS ELBON









