

NRC staff's understanding of information to be supplied by Entergy Operations, Inc./GGNS (EOI) related to the Predecisional Enforcement Conference (PEC) of July 16, 2013

For purposes of the follow-up PEC and any information EOI wishes to present to the staff related to the proposed enforcement, this could be by public meeting, public teleconference meeting, or letter, at EOI's choice. The staff understands that EOI desires a public teleconference meeting. However, the staff also notes that in order to complete the SER on the GGNS LRA, complete and accurate responses to the RAIs indicated below will be needed in writing and on the docket. Those RAI responses can be delivered to the staff at a later date than EOI's presentation for the follow-up PEC.

1. Provide final answers to the three example situations cited in the NOV:
 - a. RAI B.1.41-3c (GN-MS-46) as part of this response: Does (procedure) GN-MS-46 include all potential pipe wall thinning mechanisms? If not, then what other process is used to monitor and trend these mechanisms?
 - b. RAIs B.1.22 -1a and -1b. Entergy to supply response resolving the inconsistencies among the responses regarding EOI management of stainless steel components and wall thinning mechanisms. At the PEC conference, Entergy stated that its FAC Program (which is embodied in GGNS procedure EN-DC-315 and the associated implementing procedures) is used to monitor for FAC as well as for several non-FAC wall-thinning mechanisms. It was also discussed that one particular carbon steel component that was in the FAC Program was replaced by a stainless steel component; and that subsequent to that replacement, the stainless steel component was dropped from being monitored by the FAC Program. The staff is concerned that components in this program which are susceptible to/being monitored for non-FAC issues could be dropped from the program altogether yet still be susceptible to non-FAC mechanisms; therefore, EOI's FAC program would not adequately manage aging effects for those components. Similarly, if a FAC-susceptible component is replaced by one not susceptible to FAC but is still susceptible to non-FAC mechanisms, it could again be dropped from EOI's program and thus not be adequately managed.
 - c. B.1.22-2, wall thinning. Resolve apparent inconsistencies in the responses, in particular actions on significance/ extent of condition. This equates to #3. Verify what was actually done regarding your extent of condition determination in the case of the wall-thinning example, such as how the expansion of sample size was determined, safety significance, and a description of your aging management programs regarding pipe wall thinning. Describe what would have been the result if the NRC had not identified and challenged this issue.
2. Provide a more complete summary of the completed root cause determination mentioned in your PEC slides of July 16, 2013 (e.g., causes, extent of condition, extent of cause(s)) along with the EOI tracking number/document ID number and completion date of that evaluation. The staff believes an appropriate summary would be sufficient since this determination could be a large document.
3. Provide EOI's perspective on the safety significance of the cited apparent violation and why.

In addition to the above, the staff understands the following information will be provided as promised by EOI during the PEC. EOI should also provide dates when this information will be provided:

1. EOI's assessment of the extent of condition in regards to other responses that were not complete or accurate (related to license renewal). (Related to the Planned Corrective Actions slide of July 16, 2013)
2. These items to be provided under the RAI process as part of response to a new RAI from the staff, if not already adequately addressed by EOI in the information supplied above:
 - a. Does the FAC Program (EN-DC-315) contain a provision for non-FAC wall thinning issues to be included in this program? If not, then how do you capture and include these types of issues?
 - b. Describe the stainless steel replacement example. Why was stainless steel selected? Why is it acceptable not to continue monitoring this situation under the FAC Program?
3. With regard to the FAC Program (EN-DC-315), provide a description of the procedure change relative to corrections made to address the situation that resulted in CRs not being written for repair/replacement of component(s) identified as having "significant wall-thinning."