

From: Lamb, John

Sent: Tuesday, April 18, 2017 6:15 AM

To: Mary Lampert

Cc: Dean, Bill; Evans, Michele; Dorman, Dan; Ross-Lee, MaryJane; Benner, Eric; Brock, Kathryn; Broaddus, Doug; Brown, Eva; Lubinski, John; Coyne, Kevin; Alley, David; Cumblidge, Stephen; Burritt, Arthur; Cline, Leonard; Carfang, Erin; Vazquez, Justin; Pinson, Brandon; Lew, David; Wall, Scott; Scott, Michael; Screnci, Diane; Sheehan, Neil; Tifft, Doug; Weil, Jenny; Dacus, Eugene; Burkhardt, Janet; Jackson, Donald; Watson, Bruce; Parrott, Jack; Carter, Ted; Kulp, Jeffrey

Subject: RE: RE: NRC Response to Pilgrim Watch's Email Dated April 5, 2017, Regarding Pilgrim Relief Request Nos. PNPS-ISI-004 and PNPS-ISI-005

Dear Ms. Lampert:

This is to acknowledge receipt of your email, dated April 12, 2017, to the U.S. Nuclear Regulatory Commission (NRC) regarding Pilgrim Nuclear Power Station (Pilgrim).

The NRC Office of Nuclear Reactor Regulation (NRR) is responsible for accomplishing key components of the NRC's nuclear reactor safety mission. As such, NRR conducts a broad range of regulatory activities in the four primary program areas of rulemaking, licensing, oversight, and incident response for Pilgrim to protect the public health, safety, and the environment. NRR works with the regions and other offices to accomplish its mission and contribute to the agency mission.

The Japan Lessons-Learned Division (JLD) supports NRR's mission by managing the NRC's actions related to the lessons learned from the Japanese nuclear accident at Fukushima Dai-ichi. JLD plans, develops, and implements the actions found necessary to enhance the safety of Pilgrim. JLD develops Commission policy papers, conducts public meetings, and follows international events related to the Fukushima Dai-ichi accident.

Region 1 Division of Reactor Projects (DRP) plans, directs and coordinates the Reactor Oversight Process (ROP), including inspection activities and related project management functions, at Pilgrim. Region 1 DRP recruits, supervises and trains staff, including resident inspectors. They perform Pilgrim assessments, which includes leading resident baseline, problem identification and resolution and supplemental inspections, as well as allegation follow-up and implementation of the Enforcement Policy. Region 1 DRP supports the Agency Action Review Meetings, and conducts public Annual Assessment Meetings at Pilgrim. Region 1 DRP provides initial response to Pilgrim events and emergencies. They develop generic correspondence and provide feedback on ROP implementation. Region 1 DRP coordinates inspection activities with the Division of Reactor Safety, NRR, and the Office of Nuclear Security and Incident Response. Region 1 DRP acts as liaison with the Division of Operating Reactor Licensing counterpart in NRR. Region 1 DRP coordinates Commission visits to Pilgrim and responds to Federal, State and Local government and public inquiries.

The Office of Nuclear Material Safety and Safeguards (NMSS) Division of Decommissioning, Uranium Recovery, and Waste Programs (DUWP) manages the NRC's program for the regulation of decommissioning, low-level waste (LLW) and uranium recovery in close coordination with other Federal agencies, States, and Native American Tribal Governments, licensees and the public. NMSS DUWP oversees decommissioning and cleanup of contaminated sites, safe management and disposal of LLW, and uranium recovery activities. Manages complex decommissioning activities and conducts safety reviews and inspections related to decommissioning. NMSS DUWP provides project management for power reactors, undergoing decommissioning and terminates licenses when decommissioning is complete. NMSS DUWP reviews reactor financial assurance plans for decommissioning and issues licenses and license amendments related to sites undergoing decommissioning.

Your email has been distributed within the NRC for appropriate consideration.

Sincerely,

John G. Lamb, Senior Project Manager
Special Projects and Process Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

From: Mary Lampert [<mailto:mary.lampert@comcast.net>]

Sent: Wednesday, April 12, 2017 9:53 AM

To: Lamb, John <John.Lamb@nrc.gov>

Cc: Dean, Bill <Bill.Dean@nrc.gov>; Evans, Michele <Michele.Evans@nrc.gov>; Dorman, Dan <Dan.Dorman@nrc.gov>; Ross-Lee, MaryJane <MaryJane.Ross-Lee@nrc.gov>; Benner, Eric <Eric.Benner@nrc.gov>; Brock, Kathryn <Kathryn.Brock@nrc.gov>; Broaddus, Doug <Doug.Broaddus@nrc.gov>; Brown, Eva <Eva.Brown@nrc.gov>; Lubinski, John <John.Lubinski@nrc.gov>; Coyne, Kevin <Kevin.Coyne@nrc.gov>; Alley, David <David.Alley@nrc.gov>; Cumblidge, Stephen <Stephen.Cumblidge@nrc.gov>; Burritt, Arthur <Arthur.Burritt@nrc.gov>; Cline, Leonard <Leonard.Cline@nrc.gov>; Carfang, Erin <Erin.Carfang@nrc.gov>; Vazquez, Justin <Justin.Vazquez@nrc.gov>; Pinson, Brandon <Brandon.Pinson@nrc.gov>; Lew, David <David.Lew@nrc.gov>; Wall, Scott <Scott.Wall@nrc.gov>; Scott, Michael <Michael.Scott@nrc.gov>; Screnci, Diane <Diane.Screnci@nrc.gov>; Sheehan, Neil <Neil.Sheehan@nrc.gov>; Tifft, Doug <Doug.Tifft@nrc.gov>; Weil, Jenny <Jenny.Weil@nrc.gov>; Dacus, Eugene <Eugene.Dacus@nrc.gov>; Burkhardt, Janet <Janet.Burkhardt@nrc.gov>; Jackson, Donald <Donald.Jackson@nrc.gov>; Watson, Bruce <Bruce.Watson@nrc.gov>; Parrott, Jack <Jack.Parrott@nrc.gov>; Carter, Ted <Ted.Carter@nrc.gov>; Kulp, Jeffrey <Jeffrey.Kulp@nrc.gov>

Subject: [External_Sender] RE: NRC Response to Pilgrim Watch's Email Dated April 5, 2017, Regarding Pilgrim Relief Request Nos. PNPS-ISI-004 and PNPS-ISI-005

Hello:

Thank you for your prompt reply.

I understand that the ASME protocol was enhanced to "provide higher quality data than previously required" - that would provide increased safety.

However, despite the fact that Pilgrim is old, Entergy was not required to meet those standards.

Although you end by saying that "the health and safety of the public is of paramount importance to the NRC." To us, if that were true, the ASME protocol that provides higher quality data would be required.

Out of curiosity, does NRC have a definition of safety and if so please provide.

Thank you and happy holiday.

Mary

the 2005-2015 inspection (a) did not inspect all of the welds (how many were not?), and (b) the most recent inspection that was done (on how many welds is not clear) used the old ASME procedures.

From: Lamb, John [<mailto:John.Lamb@nrc.gov>]

Sent: Tuesday, April 11, 2017 10:43 AM

To: mary.lampert@comcast.net

Cc: Dean, Bill <Bill.Dean@nrc.gov>; Evans, Michele <Michele.Evans@nrc.gov>; Dorman, Dan <Dan.Dorman@nrc.gov>; Ross-Lee, MaryJane <MaryJane.Ross-Lee@nrc.gov>; Benner, Eric <Eric.Benner@nrc.gov>; Brock, Kathryn <Kathryn.Brock@nrc.gov>; Broaddus, Doug <Doug.Broaddus@nrc.gov>; Brown, Eva <Eva.Brown@nrc.gov>; Lubinski, John <John.Lubinski@nrc.gov>; Coyne, Kevin <Kevin.Coyne@nrc.gov>; Alley, David <David.Alley@nrc.gov>; Cumblidge, Stephen <Stephen.Cumblidge@nrc.gov>; Burritt, Arthur <Arthur.Burritt@nrc.gov>; Cline, Leonard <Leonard.Cline@nrc.gov>; Carfang, Erin <Erin.Carfang@nrc.gov>; Vazquez, Justin <Justin.Vazquez@nrc.gov>; Pinson, Brandon <Brandon.Pinson@nrc.gov>; Lew, David <David.Lew@nrc.gov>; Wall, Scott <Scott.Wall@nrc.gov>; Scott, Michael <Michael.Scott@nrc.gov>; Screnci, Diane <Diane.Screnci@nrc.gov>; Sheehan, Neil <Neil.Sheehan@nrc.gov>; Tifft, Doug <Doug.Tifft@nrc.gov>; Weil, Jenny <Jenny.Weil@nrc.gov>; Dacus, Eugene <Eugene.Dacus@nrc.gov>; Burkhardt, Janet <Janet.Burkhardt@nrc.gov>; Jackson, Donald <Donald.Jackson@nrc.gov>; Watson, Bruce <Bruce.Watson@nrc.gov>; Parrott, Jack <Jack.Parrott@nrc.gov>; Carter, Ted <Ted.Carter@nrc.gov>; Kulp, Jeffrey <Jeffrey.Kulp@nrc.gov>

Subject: NRC Response to Pilgrim Watch's Email Dated April 5, 2017, Regarding Pilgrim Relief Request Nos. PNPS-ISI-004 and PNPS-ISI-005

Dear Ms. Lampert:

I am responding to your e-mail dated April 5, 2017 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML17101A282), to the U.S. Nuclear Regulatory Commission (NRC), regarding the Pilgrim Nuclear Power Station (Pilgrim). Specifically, your e-mail communicated questions regarding Pilgrim's Relief Request Nos. PNPS-ISI-004 and PNPS-ISI-005 for relief from the American Society of Mechanical Engineers (ASME) Code, Section XI, volumetric inspections (ADAMS Accession No. ML17081A563). Your email had the following questions:

- (1) Were the welds tested in the past?
- (2) When in the past?
- (3) How were they tested?
- (4) If they have been tested in the past, what has changed to make testing difficult?

BACKGROUND

In the document cited, Entergy requested relief from the "essentially 100 percent" volumetric coverage requirements for certain welds on the basis that the Code requirement is impractical due to the geometric configuration of the components.

The NRC regulations require that inservice examination of components and system pressure tests conducted during the first 10-year interval and subsequent intervals comply with the requirements in the latest edition and addenda of Section XI of the ASME Code, which was incorporated by reference in Title 10 of the *Code of Federal Regulations*, Part 50, Section 55a(b), 12 months prior to the start of the 10-year interval, subject to the limitations and modifications listed therein.

RESPONSES TO PILGRIM WATCH QUESTIONS

Question 1

Were the welds tested in the past?

Response 1

Yes, the welds have been previously tested.

Question 2

When in the past?

Response 2

These welds are inspected once during each 10-year inservice inspection interval, i.e., between 1975-1985; 1985-1995; 1995-2005; and 2005-2015. Specifically, during the most recent interval, the inspections were conducted during May 2009, and April 2011.

Question 3

How were they tested?

Response 3

These welds were examined using ultrasonic testing (UT).

Question 4

If they have been tested in the past, what has changed to make testing difficult?

Response 4

Nothing has physically changed to make the test (inspection) more difficult. What has changed is that the last exams were conducted (qualified) in accordance with a **more rigorous process that is now required by the ASME Code**. The current ASME Code requires **higher quality data than that previously required**. Given the new data requirements, some portions of welds that previously could be considered inspected now must be classified as **missed coverage**. However, Entergy performed additional "**best effort**" inspection, which brought the volumetric coverage of the welds to close to 100-percent. Although the **additional "best effort" inspections did not meet current qualification requirements, they were performed in a manner consistent with the ASME qualification process for the first three examinations**. Therefore, the relief request which is the basis for your question is not the result of a decrease in the inspection of these welds, but rather an increase in the data quality acceptance criterion associated with the inspection.

As always, the health and safety of the public is of paramount importance to the NRC, and we appreciate your interest in our mission.

Sincerely,

John G. Lamb, Senior Project Manager
Special Projects and Process Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation