Oconee SLRA: Breakout Questions

SLRA Section B2.1.27, "Internal Coatings/Linings for In-Scope Piping, Piping Components, Heat Exchangers, and Tanks"

TRP: 15

Question Number	SLRA Section	SLRA Page	Background / Issue (As applicable/needed)	Discussion Question / Request
1	N/A	N/A	The staff reviewed SLR-ONS-AMPR-XI.M41, "Buried and Underground Piping and Tanks AMP Evaluation Report," Revision 1, and noted the program addresses gray cast iron piping. The staff also notes that there are no aging management review items for gray cast iron exposed to a soil environment.	Note: Discussion regarding if there is in-scope buried gray cast iron piping at ONS will be part of the Buried and Underground Piping and Tanks breakout (specifically Question No. 2). Since this piping is often mortar-lined, the staff added this topic here for completeness.
2	A2.16	A-18	GALL-SLR AMP XI.M42 states the following: "[t]he aging effects associated with fire water tank internal coatings/linings are managed by Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report aging management program (AMP) XI.M27, "Fire Water System," instead of this AMP. However, where the fire water storage tank internals are coated, the Fire Water System Program and Final Safety Analysis Report (FSAR) Summary Description of the Program *should be enhanced to include the recommendations associated with training and qualification of personnel* [emphasis added by the staff] and the "corrective actions" program element. The Fire Water System Program should also be enhanced to include the	The UFSAR Supplement for the Fire Water System program does not include the recommendations associated with training and qualification of personnel involved in coating/lining inspections.

			recommendations from the “acceptance criteria” program element.” SLRA 3.3.2-24, “High Pressure Service Water System,” states the internally coated/lined elevated water storage tank will be managed for loss of coating/lining integrity using the Fire Water System program. SLRA Section A2.16, “Fire Water System,” Enhancement No. 10 states (in part): “[a]cceptance criteria and corrective actions for internal inspections of the elevated water storage tank will be in accordance with the Internal Coatings/Linings for In-Scope Piping, Piping Components, Heat Exchangers and Tanks program.”	
3	B2.1.27	B-191	Topic: Generic Note E items citing loss of coating/lining integrity (other than the Fire Water System program). AMP XI.M42 states AMP XI.M38 (or other appropriate internal surfaces inspection program) can be used to manage loss of coating or lining integrity when the following six conditions are met: (1) loss of coating or lining integrity cannot result in downstream effects; (2) the component’s only CLB intended function is leakage boundary (spatial) or structural integrity (attached); (3) internal environment does not contain chemical compounds that could cause accelerated corrosion; (4) internal environment would not promote	SLR-ONS-AMPR-XI.M42, “Internal Coatings/Linings for In-scope Piping, Piping Components, Heat Exchangers, and Tanks AMP Evaluation Report,” Revision 1, on the ePortal addresses some of the six conditions cited in AMP XI.M42 to use an alternative AMP to manage loss of coating or lining integrity. However, it does not address all aspects (e.g., potential for galvanic couples, why an internal environment of raw water would not promote microbiologically influenced

			microbiologically influenced corrosion of the base metal; (5) the coated/lined components are not located in the vicinity of uncoated components that could cause a galvanic couple to exist; and (6) the design for the component did not credit the coating/lining (e.g., the corrosion allowance was not zero). At Oconee, the Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components program will manage the following internally-coated components: (1) drain pans cited in SLRA Table 3.3.2-29; (2) package steam fired water heater tank in SLRA Table 3.3.2-36; (3) feedwater pump turbine oil and main turbine oil tanks in SLRA Table 3.3.2-30. At Oconee, the Water Chemistry and One-Time Inspection programs will manage the internally-coated powdex and slurry tanks cited in SLRA Table 3.4.2-1. At Oconee, the Open-Cycle Cooling Water program will manage the following internally-coated components: (1) main condenser waterbox and tubesheet in SLRA Table 3.4.2-1; and (2) main turbine oil tank oil cooler heat exchanger head in SLRA 3.3.2-30.	corrosion). The basis for utilizing an alternative AMP should be docketed so that the staff can evaluate these generic note E items. In addition, the staff seeks clarification regarding the use of the One-Time Inspection program (in lieu of a periodic internal surface inspection program) for the internally-coated powdex and slurry tanks.