Entergy

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November 10, 2004

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

SUBJECT: Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
Docket No. 50-293
License No. DPR-35

Response to NRC Request for Additional Information on Pilgrim Request for amendment to provide a one-time integrated leak rate test interval extension (TAC NO. MC2706)

REFERENCE: 1. Entergy Letter No. 2.04.027, Request for amendment to the Technical Specifications to provide a one-time integrated leak rate test interval extension, dated April 14, 2004.

LETTER NUMBER: 2.04.110

Dear Sir or Madam:

Attachment 1 to this letter provides Pilgrim response to the NRC Request for Additional Information in support of Pilgrim's request contained in Reference 1.

There are no commitments contained in this letter.

If you have any questions or require additional information, please contact Mr. Bryan Ford, Licensing Manager, at (508) 830-8403.

I declare under the penalty of perjury that the foregoing is true and correct. Executed on the 10th day of November 2004.

Sincerely,

Stephen J. Bethay for MAB

Michael A. Balduzzi

ES/dm

Attachment 1: Pilgrim Response to NRC Request for Additional Information (10 pages)
Attachment 2: Table 3, Pilgrim IWE Containment First Interval Inspections and Findings To Date (9 pages)

A047

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ATTACHMENT 1

Pilgrim Response to NRC Request for Additional Information

Request for Amendment to the Technical Specifications to Provide a One-time Integrated Leak Rate Test Interval Extension

NRC QUESTION NO. 1

In the last paragraph of page 7 of reference 1, Entergy stated that augmented examinations documented corrosion in the drywell-to-torus main vent low points, which were below minimum wall thickness but were found acceptable by evaluation.

a. Describe the basis for Entergy's determination that the below minimum wall thickness is acceptable. The following information is needed: location and size of the areas in question, their nominal design thickness and the actual measured thickness.

b. Discuss the potential impact of the proposed one-time ILRT interval extension upon Entergy's continued ability to timely identify and evaluate containment degradation to reasonably assure the leak-tightness and structural integrity of Pilgrim's containment.

PILGRIM RESPONSE

a. Prior to inspecting the containment structure, calculations were performed to determine minimum acceptable thickness for general area and localized areas. The statement in reference 1 was with respect to general area thickness. Inspection of the drywell to torus vent line low point bowl regions identified areas of localized pitting. The individual pits were sized and compared to both general area and local area minimum wall thickness requirements. The results of this comparison are shown on Table 1 where t_{vent} is the measured wall thickness in the general area of the pit, t_{local} is the local area wall thickness at the location of the pit, $t_{min\ area}$ is the minimum allowable thickness for the entire vent pipe system, and $t_{min\ local}$ is the calculated minimum allowable thickness at the pit and accounts for pit size and depth. In some cases t_{local} is slightly less than $t_{min\ area}$, but in all cases t_{local} is greater than $t_{min\ local}$. The nominal design wall thickness in the bowl region is 0.25 inches for the vent pipe and 0.44 inches for the end cap.

TABLE 1

Pitting Vent Pipes A, B, E, F and G [1]

Pit No.	Dia. (in)	Depth (in)	t_{vent} (in)	t_{local} (in)	$t_{min\ area}$ (in)	$t_{min\ local}$ (in)
Vent Pipe B @ 292.5^0 Azimuth						
1	.125 to .25	.049	.258	.209	.210	.189 OK
2	.125 to .25	.043	.258	.215	.210	.189 OK
9	.125 to .25	.055	.260	.205	.210	.189 OK
7	.25	.057	.261	.204	.210	.189 OK
Vent Pipe G @ 337.5^0 Azimuth						
1	.25	.052	.246	.194	.210	.189 OK
2	.25	.067	.249	.182	.210	.046 OK [2]
3	.125	.053	.249	.196	.210	.189 OK
6	Not Recorded	.066	.401	.335	.210	.210 OK
7	Not Recorded	.047	.365	.318	.210	.210 OK
Vent Pipe A @ 247.5^0 Azimuth						
A	.25	.035	.250	.215	.210	.189 OK
B	.25	.056	.265	.209	.210	.189 OK
C	.19	.060	.266	.206	.210	.189 OK
Vent Pipe E @ 67.5^0 Azimuth						
A	Not Recorded	.039	.265	.226	.210	.210 OK
Vent Pipe F @ 112.5^0 Azimuth						
A	.75	.047	.251	.204	.210	.189 OK
B	.25	.033	.251	.218	.210	.189 OK
C	.75	.033	.251	.218	.210	.189 OK

Table 1 Notes
1. Vent pipe required thickness determined using MK 1 Loads (NUREG 0661) by Calculation M899.
2. A more detailed local pitting evaluation was performed as outlined in Calculation M899.

b. Pilgrim Station is requesting a one-time extension of the ILRT containment pressurization test only. In order to allow for early uncovering of evidence of structural deterioration, Pilgrim Station is planning to perform the visual examination of accessible interior and exterior surfaces of the containment system during RFO 15 in 2005. The visual examination will also be performed again prior to the ILRT currently planned for the RFO in 2009. Current plans call for the vent system locations where coating repairs were made in 1999 to be re-inspected to VT-3 visual standards during the Detailed Visual Walkdown scheduled for RFO16 in 2007. Additionally, augmented ultrasonic examinations of containment wall thickness will continue to be performed at selected upper drywell locations in RFO17 (2009) and of the torus shell in RFO16 (2007).

Pilgrim Station will continue to perform the Type B and Type C Local Leak Rate Testing during the interval extension period. In addition, the primary containment nitrogen makeup usage will continue to be monitored for any trend that may be indicative of a potential degradation of containment leak-tightness.

NRC QUESTION NO. 2

Section 5.1.3 of attachment 5 to reference 1, Entergy's First Ten-Year Interval IWE Containment Inspection Program, also describes Code Category E-C augmented examinations for Pilgrim's containment. Please discuss the containment's key augmented examination results beyond those reported in Section 5.1.3 that would provide additional performance based justifications for the staff's acceptance of the proposed one-time ILRT interval extension.

PILGRIM RESPONSE:

In addition to the Section 5.1.3 inspections, augmented ultrasonic (UT) examinations were conducted in 1999 and 2001 at the 9, 72 and 83-foot elevations of the drywell shell and detected no wall loss or evidence of degradation after approximately 28 years of service. Augmented UT examinations at two locations on the 72-foot elevation adjacent to the spent fuel pool will continue to be performed once every 10 years in accordance with the Pilgrim IWE program.

The drywell wall thickness measurements are supported by the lack of any leakage detected from the annulus drain lines. Leakage from the refueling bellows when the refueling cavity is flooded or leakage due to spent fuel pool leaks would eventually be directed into the annulus drains. Leak checks of the annulus drain lines are performed during each refueling outage shortly after flooding up to the maximum elevation (116 ft) and prior to draining down at the end of each outage. No leakage has ever been found coming from an annulus drain.

Torus (suppression pool) wall thickness was measured ultrasonically in 1999 and 2003 in four locations near the water line and at an additional four submerged locations. Torus wall thickness was determined to be at nominal wall thickness values.

Entergy Engineering chose these augmented examination locations discussed above as the areas most likely to experience degradation due to external corrosion considering the containment design and fabrication methods used during construction at Pilgrim Station.

The fact that no degradation of the containment was discovered in the approximately 28 years since commencing commercial power operations in 1972 provides performance based justification for the premise that Pilgrim's containment structure has not degraded significantly over time and for NRC acceptance of the one-time ILRT interval extension.

NRC QUESTION NO. 3

In attachment 5 to reference 1, Table 5.3.2, "Pilgrim Nuclear Power Station IWE Components Scheduled for Examination During 1st IWE Interval" only addresses the first 10-year interval.

a. Please document Entergy's ISI methods and plans for the additional 5-year extended period that would provide assurance that in the absence of an ILRT for fifteen years, the containment structural and leak tight integrity will be maintained.

b. Additionally, many plant specific inspection activities listed in this table must have been completed to date. Provide a detailed summary of ISI and related containment testing activities listed in the table that have been completed to date including inspection/testing dates, findings, corrective actions, and maintenance/repair as well as containment modifications.

c. Based on the above plant specific ISI results, discuss Entergy's performance based justifications for staff's acceptance of the proposed one-time ILRT interval extension from ten to fifteen years.

d. Table 5.3.2 also lists projected examination schedules covering the first IWE interval for the listed plant components. Discuss how these component examination schedules would be impacted or revised during the proposed extended period after September 2008.

PILGRIM RESPONSE

a. The first ten-year IWE inspection interval ends in September 2008. The second IWE ten-year program examinations will be performed in accordance with code requirements as determined by the code accepted by reference in 10CFR50 twelve months prior to the start of the interval. Augmented examination areas will be selected in accordance with code requirements in effect at that time. The performance of code required examinations during the second ten year interval beginning September 2008 and Appendix J Type B and C tests performed during each refueling outage will provide sufficient assurance that containment structural and leak tight integrity will be maintained for the two-year period from September 2008 to 2010.

b. Please refer to Attachment 2, "Table 3, Pilgrim IWE Containment First Interval Inspections and Findings To Date" for the requested information.

c. Pilgrim Station is planning to perform the visual examination of accessible interior and exterior surfaces of the containment system during RFO 15 in 2005. The visual examination will also be performed again prior to the ILRT currently planned for the RFO in 2009. Current plans call for the vent system locations where coating repairs were made in 1999 to be re-inspected to VT-3 visual standards during the Detailed Visual Walkdown scheduled for RFO16 in 2007. Additionally, augmented ultrasonic examinations of containment wall thickness will continue to be performed at

selected upper drywell locations in RFO17 (2009) and of the torus shell in RFO16 (2007). The fact that no degradation of the containment was discovered in the approximately 28 years since commencing commercial power operations in 1972 provides performance based justification for the premise that Pilgrim's containment structure has not degraded significantly over time and for NRC acceptance of the one-time ILRT interval extension.

d. Inspections scheduled for the second ten year IWE inspection interval beginning September 2008 will be scheduled in accordance with requirements of the code accepted by reference in 10CFR50 twelve months prior to the start of the interval as required by ASME XI.

NRC QUESTION NO. 4

Inspections of some reinforced concrete and steel containment structures have found degradation on the non-inspectable (embedded) side of the drywell steel shell and steel liner of the primary containment. These degradations cannot be found by visual (i.e., VT-1 or VT-3) examinations unless the degradation is through the thickness of the shell or liner, or 100% of the non-inspectable surfaces are periodically examined by ultrasonic testing.

a. Document how potential leakage under high pressure during core damage accidents is factored into the risk assessment implemented for justifying the proposed one-time ILRT interval extension.

b. Discuss the potential impact of the proposed ILRT interval extension upon the Entergy's continued ability to reasonably assure the leak tightness and structural integrity of Pilgrim's containment.

PILGRIM RESPONSE

a. The Pilgrim containment liner corrosion analysis utilized the Calvert Cliffs Nuclear Power Plant assessment to estimate the risk impact from containment liner corrosion during an extension of the ILRT interval.

   The following are a list of key assumptions used in the Calvert Cliffs assessment applicable to the Pilgrim liner corrosion risk analysis:

   1. A half failure is assumed for basemat concealed liner corrosion due to the lack of identified failures.

   2. The exposure period of 5.5 years reflects the period (for Calvert Cliffs) since 10CFR 50.55a required visual inspections (September 1996).

   3. The steel shell flaw likelihood is assumed to double every five years.

4. The likelihood of the containment atmosphere reaching the outside atmosphere given a liner flaw exists was estimated as a function of the pressure inside Containment.

5. The likelihood of leakage escape (due to crack formation) in the basemat region is considered to be less likely than the containment cylinder and dome region.

6. A 5% visual inspection detection failure likelihood given the flaw is visible and a total detection failure likelihood of 10% is used.

7. A 100% visual inspection detection failure likelihood given the flaw is located in an inaccessible area of either the drywell or torus.

8. All non-detectable containment failures are assumed to result in early releases.

9. The probability of a concurrent containment breach given a flaw in the containment liner is depicted as an exponential function.

<u>These assumptions are justified and validated as follows:</u>

1. The assumption of a half failure is a typical statistical technique for cases wherein no failures have occurred.

2. The containment liner corrosion exposure period is bounding as no additional failures have been identified in the nuclear industry since March 2002 and no failures were identified prior to September 1996 (the date when 10CFR 50.55a was implemented). Therefore, the actual exposure time period is greater than 5.5 years. However, by using the lower exposure time of 5.5 years, the results are considered bounded.

3. Similar to the Calvert Cliffs assumption, this is based solely on judgment and is included in this analysis to address the increase likelihood of corrosion as the steel shell ages. Sensitivity studies are included that addresses doubling this rate every 10 years and every two years.

4. The Pilgrim containment will exhibit a similar behavior as the Calvert Cliffs Containment liner. Namely, as Containment pressure increases, cracks will form. Subsequently, if a crack occurs in the same region as a liner flaw, then the Containment atmosphere can communicate with the outside atmosphere. At low pressures, this crack formation is extremely, unlikely. However, near the point of Containment failure, crack formation is virtually guaranteed. Therefore, the analysis uses anchored points of 0.1% at 20 psia and 100% at 113 psia (Pilgrim's plant specific ultimate Containment failure pressure). Sensitivity studies are included that decrease and increase the 20-psia anchor point by of factor of 10.

5. The leakage potential via the Drywell floor was assumed to be ten times less likely than via other sections of the Containment structure. The bottom of the liner lies between a layer of concrete comprising the Drywell floor and the

concrete basemat. This arrangement provides an additional barrier to leakage from undetected liner corrosion through the floor, since any liner corrosion would need to coincide with crack formation on both sides.

6. This assumption is applicable to Pilgrim because to date, all liner corrosion events have been detected through visual inspection. Sensitivity studies are included that evaluates total detection failure likelihood's of 5% and 15%.

7. This assumption is applicable because the Pilgrim containment structure does have some inaccessible areas.

8. Containment liner corrosion, as a phenomenon does not contribute to core damage frequency (CDF), but is part of the sequence of events leading to accident releases. Thus, CDF is unchanged for a Type A ILRT extension. CDF may be divided into the various PRA Accident Classes and further sub-divided into the release categories that comprise Large Early Release Frequency (LERF). The High/Early portions of EPRI Accident Classes 2, 3b, 6, 7 and 8 comprise the base LERF. The impact of a Type A ILRT extension is postulated to cause an increase in LERF, and is categorized as EPRI Accident Class 3b.

   Assuming a Type A ILRT extension, LERF is the base LERF plus the change in LERF due to the extension. The extension of the Type A ILRT is also postulated to allow previously undetected corrosion to progress such that accident sequences previously not contributing to LERF would contribute to LERF. Accident classes comprising LERF are unaffected by the Type A ILRT extension because these classes are already "Large" and "Early". Therefore, the non-LERF accident classes form the source for additional large early releases due to the Type A ILRT extension.

9. The probability of Containment breach is typically developed as an exponential function. Calvert Cliffs used the upper and lower Containment failure pressure points (from the PRA) to estimate Containment failure probability versus Containment pressure. The Pilgrim Containment failure probability profile is developed similarly.

b. Please refer to the response to question 1.b.

NRC QUESTION NO. 5

Per Information Notice 92-20, stainless steel bellows have been found to be susceptible to trans-granular stress corrosion cracking (SCC) and the leakage through them is not readily detectable by Type B testing. If applicable, document the inspection and testing of Pilgrim's bellows, and discuss how such potential SCC behavior has been factored into the risk assessment implemented for justifying the proposed one-time ILRT interval extension.

PILGRIM RESPONSE

IN 92-20 documented that Type B testing performed on two ply expansion bellows with one pressurization test connection did not detect a through wall defect that existed downstream of a crimp in the bellows. Due to the crimp in the bellows, the area with the defect did not communicate with the test connection area. Pilgrim Station expansion bellows configuration has two test connections, one on each end of the bellows. As a result of IN 92-20, Pilgrim Station performs a flow test across the bellows to verify that the test connections communicate across the bellows (i.e. the bellows is not crimped), followed by a flow makeup leakage test. Since Pilgrim Station's configuration has the two test connections, the potential for undetected potential SCC behavior did not need to be factored into the risk assessment.

NRC QUESTION NO. 6

For the examination of seals and gaskets, and examination and testing of bolted connections associated with the primary containment pressure boundary (Examination Categories E-D and E-G), reference 2 granted relief from the code's requirements. As an alternative, it was proposed to examine these items during the leak rate testing of the primary containment. However, Option B of Appendix J for Type B and Type C testing (as per Nuclear Energy Institute 94-01 and Regulatory Guide 1.163) and the ILRT interval extension requested in this amendment request for Type A testing, provides flexibility in the scheduling of these inspections. Please document your schedule for examination and testing of seals, gaskets, and bolts beyond the first ten-year period that would provide assurance regarding the integrity of the containment pressure boundary.

PILGRIM RESPONSE

The current ten-year ILRT interval ends in May 2005. Table 2 below lists the currently planned testing for the Type B testing of seals, gaskets, and O-Rings.

TABLE 2
Planned Testing for Type B testing of seals, gaskets, and O-Rings

Component ID	Component Description	Year
Gibbs Manway @ 0º	Gibbs Manway O-Rings	2005
Gibbs Manway @ 45º	Gibbs Manway O-Rings	2005
Gibbs Manway @ 90º	Gibbs Manway O-Rings	2005
Gibbs Manway @ 135º	Gibbs Manway O-Rings	2005
Gibbs Manway @ 180º	Gibbs Manway O-Rings	2005
Gibbs Manway @ 225º	Gibbs Manway O-Rings	2005
Gibbs Manway @ 270º	Gibbs Manway O-Rings	2005
Gibbs Manway @ 315º	Gibbs Manway O-Rings	2005
Drywell Head	Drywell Head O-Rings	Each RFO
Drywell Head Access Hatch	Hatch O-Rings	2013
Equipment Hatch	Hatch O-Rings	Each RFO

Component ID	Component Description	Year
Personnel Airlock	Personnel Airlock Gaskets And Seals	Each RFO
CRD Removal Hatch	Hatch O-Rings	Each RFO
North Torus Hatch	Hatch O-Rings	Each RFO
East Torus Hatch	Hatch O-Rings	Each RFO
Torus Test Connection Flange	Flange O-Rings	2007
Inboard Flange of AO-5044A	Flange O-Rings	2005
Inboard Flange of AO-5044B	Flange O-Rings	2005
Outboard Flange of AO-5044B	Flange O-Rings	2005
Inboard Flange of AO-5035B	Flange O-Rings	2013
Inboard Flange of AO-5035A	Flange O-Rings	2013
Outboard Flange of AO-5035A	Flange O-Rings	2013
TIP Drive Flange X35A (Inner)	Flange O-Rings	2005
TIP Drive Flange X35A (Outer)	Flange O-Rings	2005
TIP Drive Flange X35B (Inner)	Flange O-Rings	2005
TIP Drive Flange X35B (Outer)	Flange O-Rings	2005
TIP Drive Flange X35C (Inner)	Flange O-Rings	2005
TIP Drive Flange X35C (Outer)	Flange O-Rings	2005
TIP Drive Flange X35D (Inner)	Flange O-Rings	2005
TIP Drive Flange X35D (Outer)	Flange O-Rings	2005
TIP Purge Flange X35E (Inner)	Flange O-Rings	2005
TIP Purge Flange X35E (Outer)	Flange O-Rings	2005
Drywell Test Connection Flange	Flange O-Rings	2013
ILRT Supplemental Conn. Flange	Flange O-Rings	2013
Inboard Flange of AO-5036B	Flange O-Rings	2009
Inboard Flange of AO-5036A	Flange O-Rings	2009
Outboard Flange of AO-5036A	Flange O-Rings	2009
HPCI Steam to Torus (Inbd Flange)	Flange O-Rings	2005
HPCI Steam to Torus (Outbd Flange)	Flange O-Rings	2005
Inboard Flange of 2301-74	Flange O-Rings	2013
Outboard Flange of 2301-74	Flange O-Rings	2013
Inboard Flange of 1301-64	Flange O-Rings	2005
Outboard Flange of 1301-64	Flange O-Rings	2005
RCIC Steam to Torus (Inbd Flange)	Flange O-Rings	2013
RCIC Steam to Torus (Outbd Flange)	Flange O-Rings	2013
Inboard Flange of AO-5040A	Flange O-Rings	2007
Outboard Flange of AO-5040A	Flange O-Rings	2007
Inboard Flange of AO-5040B	Flange O-Rings	2007
Outboard Flange of AO-5040B	Flange O-Rings	2007
Inboard Flange of AO-5042A	Flange O-Rings	2007
Inboard Flange of AO-5042B	Flange O-Rings	2007
Outboard Flange of AO-5042B	Flange O-Rings	2007
Inboard Flange of AO-5025	Flange O-Rings	2007
Flange of X-212A Seat	Flange Gasket	2007
Flange of X-212B Seat	Flange Gasket	2007

Component ID	Component Description	Year
Electrical Penetration X100A	Seal	2013
Electrical Penetration X100B	Seal	2013
Electrical Penetration X100C	Seal	2013
Electrical Penetration X100D	Seal	2013
Electrical Penetration X100E	Seal	2005
Electrical Penetration X101A	Seal	2013
Electrical Penetration X101B	Seal	2013
Electrical Penetration X101C	Seal	2005
Electrical Penetration X102A	Seal	2013
Electrical Penetration X102B	Seal	2005
Electrical Penetration X103A	Seal	2013
Electrical Penetration X103B	Seal	2005
Electrical Penetration X104A	Seal	2005
Electrical Penetration X104B	Seal	2005
Electrical Penetration X104C	Seal	2005
Electrical Penetration X104D	Seal	2013
Electrical Penetration X104E	Seal	2013
Electrical Penetration X104F	Seal	2013
Electrical Penetration X104G	Seal	2013
Electrical Penetration X104H	Seal	2013
Electrical Penetration X104J	Seal	2013
Electrical Penetration X105A	Seal	2005
Electrical Penetration X105B	Seal	2013
Electrical Penetration X106B	Seal	2013
Electrical Penetration X202A	Seal	2013
Electrical Penetration X202B	Seal	2013

Attachment 2: Table 3, Pilgrim IWE Containment First Interval Inspections and Findings to Date

Component	Description	Location	Completed Inspection Date	Findings	Disposition	Corrective Actions	Comments
H-50-1-270GIBS	DRYWELL STABILIZER	DRYWELL	1999	None	n/a	n/a	UPPER DRYWELL STABILIZER BEHIND GIBS MANWAY AT 270 AZ.
H-50-1-TORUSBAY13	TORUS SUPPORTS	TORUS ROOM	1999	Torus saddle support found with loose anchor bolt extensions and baseplate corrosion.	Bolting- rework; Baseplate corrosion-accept-as-is	Bolts re-torqued to correct specifications; baseplate corrosion determined to be minor and acceptable.	TORUS SUPPORTS (ONE SADDLE AND ONE EARTHQUAKE TIE) BAY 13 ON DRAWINGS C1A175SH1 & C1A-62-4
H-50-1-TORUSBAY5	TORUS SUPPORTS	TORUS ROOM	2003	None	n/a	n/a	TORUS SUPPORTS (ONE SADDLE AND ONE EARTHQUAKE TIE) BAY 5 ON DRAWINGS C1A175SH1 & C1A-62-4
H-50-1-TORUSBAY9	TORUS SUPPORTS	TORUS ROOM	2001	None	n/a	n/a	TORUS SUPPORTS (ONE SADDLE AND ONE EARTHQUAKE TIE) BAY 9 ON DRAWINGS C1A175SH1 & C1A-62-4
IWE-ANNDRN-080	ANNULUS DRAINS(2) AT 80 AZ.	TORUS ROOM	1999	None	n/a	n/a	AUGMENTED VT-2 OF ANNULUS DRAINS(2) AT 80 degree AZIMUTH. BAY 3
IWE-ANNDRN-080	ANNULUS DRAINS(2) AT 80 AZ.	TORUS ROOM	2001	None	n/a	n/a	AUGMENTED VT-2 OF ANNULUS DRAINS(2) AT 80 degree AZIMUTH. BAY 3
IWE-ANNDRN-080	ANNULUS DRAINS(2) AT 80 AZ.	TORUS ROOM	2003	None	n/a	n/a	AUGMENTED VT-2 OF ANNULUS DRAINS(2) AT 80 degree AZIMUTH. BAY 3
IWE-ANNDRN-170	ANNULUS DRAINS(2) AT 170 AZ.	TORUS ROOM	1999	None	n/a	n/a	AUGMENTED VT-2 OF ANNULUS DRAINS(2) AT 170 degree AZIMUTH. BAY 7
IWE-ANNDRN-170	ANNULUS DRAINS(2) AT 170 AZ.	TORUS ROOM	2001	None	n/a	n/a	AUGMENTED VT-2 OF ANNULUS DRAINS(2) AT 170 degree AZIMUTH. BAY 7
IWE-ANNDRN-170	ANNULUS DRAINS(2) AT 170 AZ.	TORUS ROOM	2003	None	n/a	n/a	AUGMENTED VT-2 OF ANNULUS DRAINS(2) AT 170 degree AZIMUTH. BAY 7
IWE-ANNDRN-260	ANNULUS DRAINS(2) AT 260 AZ.	TORUS ROOM	1999	None	n/a	n/a	AUGMENTED VT-2 OF ANNULUS DRAINS(2) AT 260 degree AZIMUTH. BAY 11
IWE-ANNDRN-260	ANNULUS DRAINS(2) AT 260 AZ.	TORUS ROOM	2001	None	n/a	n/a	AUGMENTED VT-2 OF ANNULUS DRAINS(2) AT 260 degree AZIMUTH. BAY 11
IWE-ANNDRN-260	ANNULUS DRAINS(2) AT 260 AZ.	TORUS ROOM	2003	None	n/a	n/a	AUGMENTED VT-2 OF ANNULUS DRAINS(2) AT 260 degree AZIMUTH. BAY 11
IWE-ANNDRN-350	ANNULUS DRAINS(2) AT 350 AZ.	TORUS ROOM	1999	None	n/a	n/a	AUGMENTED VT-2 OF ANNULUS DRAINS(2) AT 350 degree AZIMUTH. BAY 15
IWE-ANNDRN-350	ANNULUS DRAINS(2) AT 350 AZ.	TORUS ROOM	2001	None	n/a	n/a	AUGMENTED VT-2 OF ANNULUS DRAINS(2) AT 350 degree AZIMUTH. BAY 15
IWE-ANNDRN-350	ANNULUS DRAINS(2) AT 350 AZ.	TORUS ROOM	2003	None	n/a	n/a	AUGMENTED VT-2 OF ANNULUS DRAINS(2) AT 350 degree AZIMUTH. BAY 15

Attachment 2: Table 3, Pilgrim IWE Containment First Interval Inspections and Findings to Date

Component	Description	Location	Completed Inspection Date	Findings	Disposition	Corrective Actions	Comments
IWE-CB-DWHEAD	CONTAINMENT BOLTING (DRYWELL HEAD)	RB 117'	1999	Drywell head bolting found with deformed (galled) threads and loss of protective coating.	Bolting- rework; Protective coating- accept-as-is	Chased threads of some bolting as required during reassembly. Protective coating not required by specification.	DRYWELL HEAD FLANGE BOLTING. CODE REQUIRED ONLY ONCE PER INTERVAL.
IWE-CB-DWHEAD	CONTAINMENT BOLTING (DRYWELL HEAD)	RB 117'	2001	None	n/a	n/a	DRYWELL HEAD FLANGE BOLTING. CODE REQUIRED ONLY ONCE PER INTERVAL.
IWE-CB-GIBS135	CONTAINMENT BOLTING	DRYWELL	1999	Access cover plate bolting found with damaged threads due to use of channel-lock pliers on threads during construction.	Accept-as-is	None taken.	CONTAINMENT BOLTING AT GIBS MANWAY AT135 AZ.
IWE-CB-GIBS135	CONTAINMENT BOLTING	DRYWELL	2003	None	n/a	n/a	CONTAINMENT BOLTING AT GIBS MANWAY AT135 AZ.
IWE-CB-GIBS180	CONTAINMENT BOLTING	DRYWELL	1999	Access cover plate bolting found with damaged threads due to use of channel-lock pliers on threads during construction.	Accept-as-is	None taken.	CONTAINMENT BOLTING AT GIBS MANWAY AT 180 AZ.
IWE-CB-GIBS180	CONTAINMENT BOLTING	DRYWELL	2003	None	n/a	None taken.	CONTAINMENT BOLTING AT GIBS MANWAY AT 180 AZ.
IWE-CB-GIBS225	CONTAINMENT BOLTING	DRYWELL	1999	Access cover plate bolting found with damaged threads due to use of channel-lock pliers on threads during construction.	Accept-as-is	None taken.	CONTAINMENT BOLTING AT GIBS MANWAY AT 225 AZ.
IWE-CB-GIBS270	CONTAINMENT BOLTING	DRYWELL	1999	Access cover plate bolting found with damaged threads due to use of channel-lock pliers on threads during construction.	Replace	Damaged studs were replaced as cover plate assembly was already disassembled for inspection.	CONTAINMENT BOLTING AT GIBS MANWAY AT 270 AZ.
IWE-CB-GIBS315	CONTAINMENT BOLTING	DRYWELL	1999	Access cover plate bolting found with damaged threads due to use of channel-lock pliers on threads during construction.	Accept-as-is	None taken.	CONTAINMENT BOLTING AT GIBS MANWAY AT 315 AZ.
IWE-CB-GIBS360	CONTAINMENT BOLTING	DRYWELL	1999	Access cover plate bolting found with damaged threads due to use of channel-lock pliers on threads during construction.	Accept-as-is	None taken.	CONTAINMENT BOLTING AT GIBS MANWAY AT 360 AZ.
IWE-CB-GIBS45	CONTAINMENT BOLTING	DRYWELL	1999	Access cover plate bolting found with damaged threads due to use of channel-lock pliers on threads during construction.	Accept-as-is	None taken.	CONTAINMENT BOLTING AT GIBS MANWAY AT 45 AZ.

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Component	Description	Location	Completed Inspection Date	Findings	Disposition	Corrective Actions	Comments
IWE-CB-GIBS90	CONTAINMENT BOLTING	DRYWELL	1999	Access cover plate bolting found with damaged threads due to use of channel-lock pliers on threads during construction.	Accept-as-is	None taken.	CONTAINMENT BOLTING AT GIBS MANWAY AT 90 AZ.
IWE-CB-X200B	CONTAINMENT BOLTING	TORUS ROOM	1999	Torus hatch cover bolting found with damaged threads.	Accept-as-is	None taken. Galling was in the center section of each stud where thread engagement is not required.	TORUS HATCH X200B BOLTING
IWE-CB-X203A	CONTAINMENT BOLTING	TORUS INTERIOR	1999	None	n/a	n/a	BOLTING FOR TORUS-DRYWELL VACUUM BREAKER PENETRATION X-203A.
IWE-CB-X203B	CONTAINMENT BOLTING	TORUS INTERIOR	1999	None	n/a	n/a	BOLTING FOR TORUS-DRYWELL VACUUM BREAKER PENETRATION X-203B.
IWE-CB-X203C	CONTAINMENT BOLTING	TORUS INTERIOR	1999	None	n/a	n/a	BOLTING FOR TORUS-DRYWELL VACUUM BREAKER PENETRATION X-203C.
IWE-CB-X203D	CONTAINMENT BOLTING	TORUS INTERIOR	2003	None	n/a	n/a	BOLTING FOR TORUS-DRYWELL VACUUM BREAKER PENETRATION X-203D.
IWE-CB-X203E	CONTAINMENT BOLTING	TORUS INTERIOR	2003	None	n/a	n/a	BOLTING FOR TORUS-DRYWELL VACUUM BREAKER PENETRATION X-203E.
IWE-CB-X203F	CONTAINMENT BOLTING	TORUS INTERIOR	2003	None	n/a	n/a	BOLTING FOR TORUS-DRYWELL VACUUM BREAKER PENETRATION X-203F.
IWE-CB-X213A	CONTAINMENT BOLTING	TORUS ROOM	2001	None	n/a	n/a	TORUS DRAIN X213A BOLTING
IWE-CB-X35A	CONTAINMENT BOLTING	TIP ROOM	2001	None	n/a	n/a	TIP PENETRATION X35A BOLTING
IWE-CB-X4	CONTAINMENT BOLTING	RB 117'	2001	None	n/a	n/a	DRYWELL HEAD MANWAY BOLTING AT PENETRATION X-4.
IWE-CB-X6	CONTAINMENT BOLTING	RB 23'	2001	None	n/a	n/a	CRD HATCH X6 BOLTING
IWE-GVWD-01	GENERAL VISUAL WALKDOWN	VARIOUS	1999	None	n/a	n/a	GENERAL VISUAL WALKDOWN TO BE DONE ONCE PER PERIOD IN CONJUNCTION WITH APPENDIX J SCHEDULE HISTORY. RFO16 WALKDOWN WILL BE THE DETAILED VISUAL (VT-3). USE ENN ENGINEERING STANDARD ENN-EP-S-001, Rev.0 FOR GVWD.
IWE-GVWD-01	GENERAL VISUAL WALKDOWN	VARIOUS	2003	None	n/a	n/a	GENERAL VISUAL WALKDOWN TO BE DONE ONCE PER PERIOD IN CONJUNCTION WITH APPENDIX J SCHEDULE HISTORY. RFO16 WALKDOWN WILL BE THE DETAILED VISUAL (VT-3). USE ENN ENGINEERING STANDARD ENN-EP-S-001, Rev.0 FOR GVWD.

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Component	Description	Location	Completed Inspection Date	Findings	Disposition	Corrective Actions	Comments
IWE-LINERDRAINS	LINER DRAINS	RB 74'	1999	None	n/a	n/a	AUGMENTED VT-2 OF 5 SPENT FUEL/EQUIP. POOL RB 74' LINER DRAINS. PERFORMED ONCE PER PERIOD WHILE FLOODED UP (for Equipment Pool leakage). Related to potential corrosion of drywell exterior from leakage into the annulus air gap.
IWE-LINERDRAINS	LINER DRAINS	RB 74'	2003	None	n/a	n/a	AUGMENTED VT-2 OF 5 SPENT FUEL/EQUIP. POOL RB 74' LINER DRAINS. PERFORMED ONCE PER PERIOD WHILE FLOODED UP (for Equipment Pool leakage). Related to potential corrosion of drywell exterior from leakage into the annulus air gap.
IWE-MB-DW-09	MOISTURE BARRIER AT DRYWELL 9 FT	DRYWELL	1999	Drywell floor seal between concrete floor and containment shell appears to be missing; corrosion of drywell shell and spalled concrete.	Accept-as-is	None taken. Moisture barrier at this location not required by construction specification. Corrosion of containment shell interior surface and concrete damage determined to be typical service and age related minor surface corrosion and chipping.	MOISTURE BARRIER AT DRYWELL 9 FT INTERIOR AT CONCRETE-SHELL INTERFACE. RFO12 EXAM FOUND NO INSTALLED MOISTURE BARRIER AT DRYWELL 9 ft elev. THEREFORE, NO FURTHER EXAMS REQUIRED POST-RFO12.
IWE-SNDCUSH-035	AUGMENTED DRYWELL UT AT 9 FT 035 AZ.	DRYWELL	1999	None	n/a	n/a	DELETED FROM PROGRAM 8/2002 PER IR 02-0400. AUGMENTED UT OF SAND CUSHION AREA AT 9 FT 035 AZ.
IWE-SNDCUSH-125	AUGMENTED DRYWELL UT AT 9 FT 125 AZ.	DRYWELL	1999	None	n/a	n/a	DELETED FROM PROGRAM 8/2002 PER IR 02-0400. AUGMENTED UT OF SAND CUSHION AREA AT 9 FT 125 AZ.
IWE-SNDCUSH-215	AUGMENTED DRYWELL UT AT 9 FT 215 AZ.	DRYWELL	1999	None	n/a	n/a	DELETED FROM PROGRAM 8/2002 PER IR 02-0400. AUGMENTED UT OF SAND CUSHION AREA AT 9 FT 215 AZ.
IWE-SNDCUSH-305	AUGMENTED DRYWELL UT AT 9 FT 305 AZ.	DRYWELL	2001	None	n/a	n/a	DELETED FROM PROGRAM 8/2002 PER IR 02-0400. AUGMENTED UT OF SAND CUSHION AREA AT 9 FT 305 AZ.
IWE-TORUS-LOWER-B1	AUGMENTED TORUS UT elev.-11ft 6in BAY 1	TORUS ROOM	1999	Wall thickness of torus shell found to be less than nominal value.	Accept-as-is	None taken. Ultrasonic thickness readings were marginally less than those specified on the inspection drawing but greater than design min. wall thickness. Consideration of fabrication tolerances (0.010") and UT instrument error (1%) allowed condition to be acceptable as is.	AUGMENTED TORUS UT elev.-11ft 6in BAY 1

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Component	Description	Location	Completed Inspection Date	Findings	Disposition	Corrective Actions	Comments
IWE-TORUS-LOWER-B1	AUGMENTED TORUS UT elev.-11ft 6in BAY 1	TORUS ROOM	2003	Wall thickness of torus shell found to be less than nominal value.	Accept-as-is	None taken. Ultrasonic thickness readings were marginally less than those specified on the inspection drawing but greater than design min. wall thickness. Consideration of fabrication tolerances (0.010") and UT instrument error (1%) allowed condition to be acceptable as is.	AUGMENTED TORUS UT elev.-11ft 6in BAY 1
IWE-TORUS-LOWER-B13	AUGMENTED TORUS UT elev.-11ft 6in BAY 13	TORUS ROOM	1999	Wall thickness of torus shell found to be less than nominal value.	Accept-as-is	None taken. Ultrasonic thickness readings were marginally less than those specified on the inspection drawing but greater than design min. wall thickness. Consideration of fabrication tolerances (0.010") and UT instrument error (1%) allowed condition to be acceptable as is.	AUGMENTED TORUS UT elev.-11ft 6in BAY 13
IWE-TORUS-LOWER-B13	AUGMENTED TORUS UT elev.-11ft 6in BAY 13	TORUS ROOM	2003	Wall thickness of torus shell found to be less than nominal value.	Accept-as-is	None taken. Ultrasonic thickness readings were marginally less than those specified on the inspection drawing but greater than design min. wall thickness. Consideration of fabrication tolerances (0.010") and UT instrument error (1%) allowed condition to be acceptable as is.	AUGMENTED TORUS UT elev.-11ft 6in BAY 13
IWE-TORUS-LOWER-B5	AUGMENTED TORUS UT elev.-11ft 6in BAY 5	TORUS ROOM	1999	Wall thickness of torus shell found to be less than nominal value.	Accept-as-is	None taken. Ultrasonic thickness readings were marginally less than those specified on the inspection drawing but greater than design min. wall thickness. Consideration of fabrication tolerances (0.010") and UT instrument error (1%) allowed condition to be acceptable as is.	AUGMENTED TORUS UT elev.-11ft 6in BAY 5

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Component	Description	Location	Completed Inspection Date	Findings	Disposition	Corrective Actions	Comments
IWE-TORUS-LOWER-B5	AUGMENTED TORUS UT elev.-11ft 6in BAY 5	TORUS ROOM	2003	Wall thickness of torus shell found to be less than nominal value.	Accept-as-is	None taken. Ultrasonic thickness readings were marginally less than those specified on the inspection drawing but greater than design min. wall thickness. Consideration of fabrication tolerances (0.010") and UT instrument error (1%) allowed condition to be acceptable as is.	AUGMENTED TORUS UT elev.-11ft 6in BAY 5
IWE-TORUS-LOWER-B9	AUGMENTED TORUS UT elev.-11ft 6in BAY 9	TORUS ROOM	1999	Wall thickness of torus shell found to be less than nominal value.	Accept-as-is	None taken. Ultrasonic thickness readings were marginally less than those specified on the inspection drawing but greater than design min. wall thickness. Consideration of fabrication tolerances (0.010") and UT instrument error (1%) allowed condition to be acceptable as is.	AUGMENTED TORUS UT elev.-11ft 6in BAY 9
IWE-TORUS-LOWER-B9	AUGMENTED TORUS UT elev.-11ft 6in BAY 9	TORUS ROOM	2003	Wall thickness of torus shell found to be less than nominal value.	Accept-as-is	None taken. Ultrasonic thickness readings were marginally less than those specified on the inspection drawing but greater than design min. wall thickness. Consideration of fabrication tolerances (0.010") and UT instrument error (1%) allowed condition to be acceptable as is.	AUGMENTED TORUS UT elev.-11ft 6in BAY 9
IWE-TORUS-MWL-B1	AUGMENTED TORUS UT AT MWL BAY 1	TORUS ROOM	1999	Wall thickness of torus shell found to be less than nominal value.	Accept-as-is	None taken. Ultrasonic thickness readings were marginally less than those specified on the inspection drawing but greater than design min. wall thickness. Consideration of fabrication tolerances (0.010") and UT instrument error (1%) allowed condition to be acceptable as is.	AUGMENTED TORUS UT AT MWL BAY 1

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Component	Description	Location	Completed Inspection Date	Findings	Disposition	Corrective Actions	Comments
IWE-TORUS-MWL-B1	AUGMENTED TORUS UT AT MWL BAY 1	TORUS ROOM	2003	Wall thickness of torus shell found to be less than nominal value.	Accept-as-is	None taken. Ultrasonic thickness readings were marginally less than those specified on the inspection drawing but greater than design min. wall thickness. Consideration of fabrication tolerances (0.010") and UT instrument error (1%) allowed condition to be acceptable as is.	AUGMENTED TORUS UT AT MWL BAY 1
IWE-TORUS-MWL-B13	AUGMENTED TORUS UT AT MWL BAY 13	TORUS ROOM	1999	Wall thickness of torus shell found to be less than nominal value.	Accept-as-is	None taken. Ultrasonic thickness readings were marginally less than those specified on the inspection drawing but greater than design min. wall thickness. Consideration of fabrication tolerances (0.010") and UT instrument error (1%) allowed condition to be acceptable as is.	AUGMENTED TORUS UT AT MWL BAY 13
IWE-TORUS-MWL-B13	AUGMENTED TORUS UT AT MWL BAY 13	TORUS ROOM	2003	Wall thickness of torus shell found to be less than nominal value.	Accept-as-is	None taken. Ultrasonic thickness readings were marginally less than those specified on the inspection drawing but greater than design min. wall thickness. Consideration of fabrication tolerances (0.010") and UT instrument error (1%) allowed condition to be acceptable as is.	AUGMENTED TORUS UT AT MWL BAY 13
IWE-TORUS-MWL-B5	AUGMENTED TORUS UT AT MWL BAY 5	TORUS ROOM	1999	Wall thickness of torus shell found to be less than nominal value.	Accept-as-is	None taken. Ultrasonic thickness readings were marginally less than those specified on the inspection drawing but greater than design min. wall thickness. Consideration of fabrication tolerances (0.010") and UT instrument error (1%) allowed condition to be acceptable as is.	AUGMENTED TORUS UT AT MWL BAY 5

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Component	Description	Location	Completed Inspection Date	Findings	Disposition	Corrective Actions	Comments
IWE-TORUS-MWL-B5	AUGMENTED TORUS UT AT MWL BAY 5	TORUS ROOM	2003	Wall thickness of torus shell found to be less than nominal value.	Accept-as-is	None taken. Ultrasonic thickness readings were marginally less than those specified on the inspection drawing but greater than design min. wall thickness. Consideration of fabrication tolerances (0.010") and UT instrument error (1%) allowed condition to be acceptable as is.	AUGMENTED TORUS UT AT MWL BAY 5
IWE-TORUS-MWL-B9	AUGMENTED TORUS UT AT MWL BAY 9	TORUS ROOM	1999	Wall thickness of torus shell found to be less than nominal value.	Accept-as-is	None taken. Ultrasonic thickness readings were marginally less than those specified on the inspection drawing but greater than design min. wall thickness. Consideration of fabrication tolerances (0.010") and UT instrument error (1%) allowed condition to be acceptable as is.	AUGMENTED TORUS UT AT MWL BAY 9
IWE-TORUS-MWL-B9	AUGMENTED TORUS UT AT MWL BAY 9	TORUS ROOM	2003	Wall thickness of torus shell found to be less than nominal value.	Accept-as-is	None taken. Ultrasonic thickness readings were marginally less than those specified on the inspection drawing but greater than design min. wall thickness. Consideration of fabrication tolerances (0.010") and UT instrument error (1%) allowed condition to be acceptable as is.	AUGMENTED TORUS UT AT MWL BAY 9
IWE-UPDW-72-252	AUGMENTED DRYWELL UT AT 72 FT 252 AZ.	DRYWELL	1999	None	n/a	n/a	REDUCED FREQUENCY IN 8/2002 TO ONCE EVERY 10 YRS PER IR 02-0400. AUGMENTED UT OF UPPER DRYWELL AT 72 FT 252 AZ. ADJACENT TO 'C' MS LINE
IWE-UPDW-72-288	AUGMENTED DRYWELL UT AT 72 FT 288 AZ.	DRYWELL	2001	None	n/a	n/a	REDUCED FREQUENCY IN 8/2002 TO ONCE EVERY 10 YRS PER IR 02-0400. AUGMENTED UT OF UPPER DRYWELL AT 72 FT 288 AZ. ADJACENT TO 'D' MS LINE
IWE-UPDW-83-072	AUGMENTED DRYWELL UT AT 83 FT 72 AZ.	DRYWELL	2001	None	n/a	n/a	DELETED FROM PROGRAM 8/2002 PER IR 02-0400. AUGMENTED UT OF UPPER DRYWELL AT 83 FT 72 AZ. ADJACENT TO 'A' MS LINE

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Component	Description	Location	Completed Inspection Date	Findings	Disposition	Corrective Actions	Comments
IWE-UPDW-83-108	AUGMENTED DRYWELL UT AT 83 FT 108 AZ.	DRYWELL	2001	None	n/a	n/a	DELETED FROM PROGRAM 8/2002 PER IR 02-0400. AUGMENTED UT OF UPPER DRYWELL AT 83 FT 108 AZ. ADJACENT TO 'B' MS LINE
IWE-UPDW-83-252	AUGMENTED DRYWELL UT AT 83 FT 252 AZ.	DRYWELL	1999	None	n/a	n/a	DELETED FROM PROGRAM 8/2002 PER IR 02-0400. AUGMENTED UT OF UPPER DRYWELL AT 83 FT 252 AZ. ADJACENT TO 'C' MS LINE
IWE-UPDW-83-288	AUGMENTED DRYWELL UT AT 83 FT 288 AZ.	DRYWELL	1999	None	n/a	n/a	DELETED FROM PROGRAM 8/2002 PER IR 02-0400. AUGMENTED UT OF UPPER DRYWELL AT 83 FT 288 AZ. ADJACENT TO 'D' MS LINE
IWE-VENT-022	AUGMENTED VENT PIPE AT 22 AZ.	TORUS INTERIOR	1999	None	n/a	n/a	AUGMENTED VT-1 OF VENT PIPE AT 22 degree AZIMUTH.
IWE-VENT-067	AUGMENTED VENT PIPE AT 67 AZ	TORUS INTERIOR	1999	None	n/a	n/a	AUGMENTED VT-1 OF VENT PIPE AT 67 degree AZIMUTH.
IWE-VENT-112	AUGMENTED VENT PIPE AT 112 AZ	TORUS INTERIOR	1999	Drywell-to-torus vent piping thickness found to be less than general area min. wall and degraded coating.	Thickness- accept; Coating- rework	Surfaces were cleaned and re-coated to prevent additional corrosion. Wall thickness was accepted due to localized pitting-type corrosion.	AUGMENTED VT-1 OF VENT PIPE AT 112 degree AZIMUTH.
IWE-VENT-157	AUGMENTED VENT PIPE AT 157 AZ	TORUS INTERIOR	1999	None	n/a	n/a	AUGMENTED VT-1 OF VENT PIPE AT 157 degree AZIMUTH.
IWE-VENT-202	AUGMENTED VENT PIPE AT 202 AZ	TORUS INTERIOR	1999	None	n/a	n/a	AUGMENTED VT-1 OF VENT PIPE AT 202 degree AZIMUTH.
IWE-VENT-247	AUGMENTED VENT PIPE AT 247 AZ	TORUS INTERIOR	1999	Drywell-to-torus vent piping thickness found to be less than general area min. wall and degraded coating.	Thickness- accept; Coating- rework	Surfaces were cleaned and re-coated to prevent additional corrosion. Wall thickness was accepted due to localized pitting-type corrosion.	AUGMENTED VT-1 OF VENT PIPE AT 247 degree AZIMUTH.
IWE-VENT-292	AUGMENTED VENT PIPE AT 292 AZ	TORUS INTERIOR	1999	Drywell-to-torus vent piping thickness found to be less than general area min. wall and degraded coating.	Thickness- accept; Coating- rework	Surfaces were cleaned and re-coated to prevent additional corrosion. Wall thickness was accepted due to localized pitting-type corrosion.	AUGMENTED VT-1 OF VENT PIPE AT 292 degree AZIMUTH.
IWE-VENT-337	AUGMENTED VENT PIPE AT 337 AZ	TORUS INTERIOR	1999	Drywell-to-torus vent piping thickness found to be less than general min. wall and degraded coating.	Thickness- accept; Coating- rework	Surfaces were cleaned and re-coated to prevent additional corrosion. Wall thickness was accepted due to localized pitting-type corrosion.	AUGMENTED VT-1 OF VENT PIPE AT 337 degree AZIMUTH.