

From: Ngoc Le
To: David Dellario
Date: 10/5/05 10:57AM
Subject: RE: Draft RAIs for NMP Amended LRA - Batch 3 [10-5-2005]

David:

Attached is the 3rd set of the staff RAIs for the NMP amended LRA review.

Please review and let me know when you would like to have a telecon to discuss the draft with the staff reviewer.

Then we will docket the RAIs. Normally you will have 30 days to respond; however, the sooner you provide the responses, the better for the staff.

tommy

CC: Pei-Ying Chen; Peter.Mazzaferro@Constellation.com; Rajender Auluck

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**Draft RAI FOR THE AGING MANAGEMENT OF AUXILIARY SYSTEMS FOR
NMP1 and NMP2 amended LICENSE RENEWAL APPLICATIONS**

EMEB

3.3 Aging Management of Auxiliary Systems

General RAI

1. a-RAI 3.3.2-1

One-Time Inspection (OTI) is appropriate where either an aging effect is not expected to occur but there is insufficient data to completely rule it out, or the aging effect is expected to occur very slowly so as not to affect the component intended function. In the Amended LRA (ALRA), the applicant proposed to use OTI program to manage aging effects for various materials exposed to various environments for majority of the components in the following two systems: (a) ALRA Table 3.3.2.A-14, NMP1 Radioactive Waste System, and (b) ALRA Table 3.3.2.B-14, NMP2 Floor and Equipment Drains System.

Please: **(1)** Explain from system characteristics standpoint, why the OTI program [rather than periodic inspections] is proposed to manage the aging effects for those material/environment combinations having OTI as the sole AMP in these two systems; and

(2) Justify the use of OTI program for the following cases:

- (A)** In ALRA Table 3.3.2.A-14, Aging Effect Requiring Management (AERM) of cracking for Wrought Austenitic Stainless Steel (WASS) Heat Exchangers exposed to air, moisture or wetting, temperature greater or equal to 140 degree F, and for WASS valves exposed to treated water, temperature greater or equal to 140 degree F but less than 212 degree F.
- (B)** In ALRA Table 3.3.2.A-14, AERM of loss of material (LOM) for carbon or low alloy steel (yield strength less than 100 ksi), or WASS valves, and piping and fittings exposed to Demineralized Untreated Water (DUW).
- (C)** In ALRA Table 3.3.2.A-14, AERM of LOM for carbon or low alloy steel (yield strength less than 100 ksi) valves exposed to either the DUW, low flow, or treated water, temperature greater or equal to 140 degree F but less than 212 degree F.
- (D)** In ALRA Table 3.3.2.B-14, AERM of cracking for WASS Drainers exposed to treated water, temperature greater or equal to 140 degree F but less than 212 degree F.
- (E)** In ALRA Table 3.3.2.B-14, AERM of LOM for aluminum pump, or carbon or low alloy steel (yield strength less than 100 ksi) strainers exposed to raw water.

ATTACHMENT

System Specific RAI

2. a-RAI 3.3.2.A-5-1

What does the Note "K" represent for Heat Exchangers, and valves and dampers in Table 3.3.2.A-5? Please explain why the LOM was not identified as an AERM for WASS Heat Exchangers exposed to DUW similar to the WASS Heat Exchangers in Table 3.3.2.A-14.