

**From:** James Davis  
**To:** Mark Orr  
**Date:** 07/05/2006 5:03:04 PM  
**Subject:** Comments on the AMP writeup.

Mark,

Attached are my comments on the AMP audit writeup.

Jim

**Mail Envelope Properties** (44AC2908.1BB : 22 : 35346)

**Subject:** Comments on the AMP writeup.  
**Creation Date** 07/05/2006 5:03:04 PM  
**From:** James Davis

**Created By:** JAD@nrc.gov

<b>Recipients</b>	<b>Action</b>	<b>Date &amp; Time</b>
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MESSAGE	419	07/05/2006 5:03:04 PM
Pilgrim AMP report comment form.wpd	27638	07/05/2006 5:00:10
PM		

**Options**

**Auto Delete:** No  
**Expiration Date:** None  
**Notify Recipients:** Yes  
**Priority:** Standard  
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**Return Notification:** None

**Concealed Subject:** No  
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**Status Tracking:** Delivered & Opened

**Document Review Comment Form**

**Document Title:**      **Audit and Review Report for Plant Aging Management Reviews and Programs  
for Pilgrim Nuclear Power Station**

**Area of Review:**      **Aging Management Audit Report Section 1. "Introduction and General Information" to Section  
3.0.3.3.6.3 "Conclusion."**

**Reviewer Guidelines:**

1. Review for specific area of responsibility and/or expertise.
2. Direct comments to the actions within the scope of the document.
3. Record comment on this form. List page number and line number from document to identify location of proposed change. If comment is extensive or you have marked-up the document, make a notation on this form (e.g., "See comments on markup copy of document.") and return both this form and the marked-up document to the comment coordinator.
4. If information is technically correct, do not change because of personal style preference. You may, however, indicate clearer or more concise wording.
5. If you consider the comment critical and require that you review the revised document before it is approved, put a "Y" in the "Critical Comment" box.

Comment No.	Page No.	Line No.	Comment	Critical Comment?	Comment Resolution
1	64	19-26	The entire paragraph needs to be removed. It is discussing the ISI program.	Yes	

2	65	18-19	<p>Remove these lines and replace them with the following: In the past 5 years there has been limited experience with the inspection of buried piping at PNPS. This experience has occurred mainly on the fire water underground distribution system. This system is approximately 35 years old and consists of cement lined malleable iron pipe with mechanical joints. There has been no history of significant leaks other than during two instances, one in 2001 and one in 2005. In the first event the 8" underground line down stream of 8-L-22 failed. The probable cause of failure was most likely induced by minor fabrication anomalies compounded by marginal installation techniques. When this piping was examined it was found to be overall in very good condition externally except for a small area of surface corrosion, attributed to marginal installation techniques. In the second event the 8" underground pipe failed in the area of the N2 tank adjacent to the EDG building. Due to congestion and the presence of the tank, which was installed subsequent to the installation of the piping, it was not possible to dig up the piping to examine it and determine the cause of the failure but may be related to the installation of the tank. In addition to these two instances there have been a number of valves excavated during maintenance which found the valves and piping to be in remarkably good condition.</p> <p>From an additional historical perspective, the salt service water (SSW) system at PNPS has experienced leaks on the buried inlet (screenhouse to auxiliary bays) piping as a result of internal corrosion. The original piping material was rubber lined carbon steel wrapped with reinforced fiberglass wrapping and coal tar saturated felt and heavy Kraft paper. The leaks were determined to be the result of the degraded rubber lining being in contact with sea water. These pipes have since been replaced with unlined Titanium wrapped with the same external coating as the original pipe. This pipe replacement</p>	Yes	
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[illegible]

[illegible]