



DATE

08/02/2006

TIME

## TELECOPIER TRANSMITTAL

## TO

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NAME AND LOCATION OF COMPANY (If other than NRC)

PNPS

Plymouth, MA

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## FROM

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## TELECOPY DATA

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THIS PAGE + 2 PAGES = 3 TOTAL

PRIORITY

☒ IMMEDIATE☐ OTHER  
(Specify)

SPECIAL INSTRUCTIONS

Gentlemen,

Commitment 32 in Amendment 3 to the LRA states "Implement the Bolting Integrity Program..." while Amendment 5 states "Enhance the Bolting Integrity Program..." Commitment 32 needs both Implement and enhance in it. Also, the next amendment needs to include the statement that the Bolting Integrity Program is a new program.

ITEM	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No. / Comments
31	<p>Prior to entering the period of extended operation, for each location that may exceed a CUF of 1.0 when considering environmental effects, PNPS will implement one or more of the following:</p> <p>(1) further refinement of the fatigue analyses to lower the predicted CUFs to less than 1.0;</p> <p>(2) management of fatigue at the affected locations by an inspection program that has been reviewed and approved by the NRC (e.g., periodic non-destructive examination of the affected locations at inspection intervals to be determined by a method acceptable to the NRC);</p> <p>(3) repair or replacement of the affected locations.</p> <p>Should PNPS select the option to manage the aging effects due to environmental-assisted fatigue during the period of extended operation, details of the aging management program such as scope, qualification, method, and frequency will be submitted to the NRC at least 2 years prior to the period of extended operation.</p>	<p>June 8, 2012</p> <p>June 8, 2010 for submitting the aging management program if PNPS selects the option of managing the affects of aging due to environmentally assisted fatigue.</p>	Letter 2.06.057	Audit item 302
32	Implement the Bolting Integrity Program in accordance with a license renewal application amendment.	June 8, 2012	Letter 2.06.057	Audit Items 364, 373, 389, 390, 432, 443, & 470
33	PNPS will inspect the inaccessible jet pump thermal sleeve and core spray thermal sleeve welds if and when the necessary technique and equipment become available and the technique is demonstrated by the vendor, including delivery system.	As stated in the commitment.	Letter 2.06.057	Audit Item 488
34	Within the first 6 years of the period of extended operation and every 12 years thereafter, PNPS will inspect the access hole covers with UT methods. Alternatively, PNPS will inspect the access hole covers in accordance with BWRVIP guidelines should such guidance become available.	June 8, 2018	Letter 2.06.057	Audit item 461
35	Perform a new feedwater nozzle fatigue analysis prior to the period of extended operation.	June 8, 2012	Letter 2.06.057	Audit item 345
36	To ensure that significant degradation on the bottom of the condensate storage tank is not occurring, a one-time ultrasonic thickness examination in accessible areas on the bottom of the condensate storage tank will be performed. Standard examination and sampling techniques will be utilized.	June 8, 2012	Letter 2.06.057	Audit Item 363

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	Related LRA Section No./ Comments
31	<p>At least 2 years prior to entering the period of extended operation, for the locations identified in NUREG/CR-6260 for BWRs of the PNPS vintage, PNPS will implement one or more of the following:</p> <p>(1) Refine the fatigue analyses to determine valid CUFs less than 1 when accounting for the effects of reactor water environment. This includes applying the appropriate Fen factors to valid CUFs determined in accordance with one of the following:</p> <ol style="list-style-type: none"> <li>1. For locations with existing fatigue analysis valid for the period of extended operation, use the existing CUF to determine the environmentally adjusted CUF.</li> <li>2. More limiting PNPS-specific locations with a valid CUF may be substituted for the NUREG/CR-6260 locations.</li> <li>3. Representative CUF values from other plants, adjusted to or enveloping the PNPS plant specific external loads may be used if demonstrated applicable to PNPS.</li> <li>4. An analysis using an NRC-approved version of the ASME code of NRC-approved alternative (e.g., NRC-approved code case) may be performed to determine a valid CUF.</li> </ol> <p>(2) Manage the effects of aging due to fatigue at the affected locations by an inspection program that has been reviewed and approved by the NRC (e.g., periodic non-destructive examination of the affected locations at inspection intervals to be determined by a method acceptable to the NRC).</p> <p>(3) Repair or replace the affected locations prior to the period of extended operation and the location exceeding a CUF of 1.0.</p> <p>Should PNPS select the option to manage the aging effects due to environmental-assisted fatigue during the period of extended operation, details of the aging management program such as scope, qualification, method, and frequency will be submitted to the NRC at least 2 years prior to the period of extended operation.</p>	<p>June 8, 2012</p> <p>June 8, 2010 for submitting the aging management program if PNPS selects the option of managing the affects of aging due to environmentally assisted fatigue.</p>	Letter 2.06.064	4.3.3/ Audit Items 302 & 346
32	Enhance the Bolting Integrity Program in accordance with a license renewal application amendment.	June 8, 2012	Letter 2.06.057	Audit items 364, 373, 389, 390, 432, 443, & 470