

From: Daily, John
Sent: Thursday, August 18, 2011 7:38 AM
To: 'Aldridge, Arden J'; Taplett, Kenneth
Cc: Morey, Dennis
Subject: Errata in AMP RAI Package - ML11214A088

We have identified 2 errata present in the recently issued RAI Package, "Requests For Additional Information For The Review Of The South Texas Project, Units 1 And 2, License Renewal Application – Aging Management Programs Audit, Plant Systems (TAC Nos. ME4938 and ME4937)," ML11214A088. The corrections follow below. We regret any inconvenience this may have caused.

1. Two RAIs have identical RAI numbers, B2.1.20-4. The first one, concerning "GALL AMP XI.M29, "Aboveground Metallic Tanks," recommends that any tank exposed to weather and constructed on concrete or soil..." and the second one: "GALL AMP XI.M36, "External Surfaces Monitoring of Mechanical Components," program element "detection of aging effects" recommends..."
 - a. To resolve this, the first RAI B2.1.20-4 dealing with GALL AMP XI.M29, will be renumbered to B2.1.20-5. The second RAI will retain its original numbering.
2. One RAI B2.1.20-1, actually involves the similar issue, regarding elastomer manipulation, in two AMPs, rather than the one listed: both AMPs B2.1.20 (see GALL AMP XI.M36), and B2.1.22 (See GALL AMP XI.M38). The **corrected text** is presented here.

RAI B2.1.20-1

Background:

The "parameters monitored/inspected" program element of GALL Report AMPs XI.M36, "External Surfaces Monitoring of Mechanical Components," and XI.M38 "Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components," Revision 2, recommends that the purpose of manual manipulation of elastomers is to reveal changes in material properties to make the visual examination process more effective in identifying aging effects. The program basis document for LRA Section B2.1.20, "External Surfaces Monitoring Program," "scope of program" program element states that physical manipulation of elastomers may be used to augment visual inspections. In addition, the Program Description for LRA Section B2.1.22 "Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components" states that physical manipulation of elastomers may be used to augment visual inspections.

Issue:

It is not clear to the staff that these statements are consistent because the term "may" allows discretion in determining whether or not to physically manipulate elastomers during visual examinations.

Request:

Revise LRA Sections B2.1.20 and B2.1.22 to state that physical manipulation of elastomers "will" be used to augment visual inspections where the component and material are appropriate for manipulation or state the basis for how the hardening and loss of strength aging effects can be consistently detected in elastomers without physically manipulating the material.

Please make a note of these corrections.

This communication will be placed into ADAMS and the ML number forwarded to you.

John Daily, MBA, PMP

Senior Project Manager, Division of License Renewal
Office of Nuclear Reactor Regulation
USNRC
John.Daily@NRC.Gov

(301) 415-3873