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Lamb, John

From: Miller, Ed *NR*
Sent: Tuesday, December 27, 2011 11:57 AM
To: Lamb, John
Subject: FW: New Letter in from C-10
Attachments: December Letter from C-10.pdf

From: Barkley, Richard *DR*
Sent: Tuesday, December 27, 2011 11:55 AM
To: Dean, Bill; Lew, David
Cc: Burritt, Arthur; Conte, Richard; Plasse, Richard; Miller, Ed; Raymond, William; Pinkham, Laurie; Matakas, Gina
Subject: New Letter in from C-10

This came in my mail today – Bill Dean, Bill Raymond, and John Lamb should have also received copies.

Copies were also cc: to Congressmen Edward Markey and John Tierney.

I'll discuss this matter with Rich Conte and Rick Plasse tomorrow and early next week. C-10 is asking a series of questions related to the concrete ASR issue at Seabrook, many related to the TIA between NRR and the Region on this issue.

We'll track this in the RA Action Item system. I'll take the lead at writing it, with input from DRS and NRR.

Richard S. Barkley, PE
Technical Communications Assistant

(610) 337-5065

(b)(6) (Cell)

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Lehman, Bryce

From: Raymond, William (R)
Sent: Wednesday, December 28, 2011 12:23 PM
To: Conte, Richard; Barkley, Richard; Dean, Bill; Lew, David
Cc: Burritt, Arthur; Plasse, Richard; Miller, Ed; Pinkham, Laurie; Matakas, Gina; Modes, Michael; Chaudhary, Suresh; Miller, Chris; Wilson, Peter; Gray, Harold
Subject: RE: New Letter in from C-10

Hi Rich,

You covered it pretty well and I can add only a few minor points.

Prior to the license renewal activities and our inspection of the topic, NextEra was in the process of upgrading the structures monitoring program as a result of an INPO AFI. In response to the AFI, NextEra revised procedures to incorporate ACI-349 into the maintenance rule (MR) program. Per Engineering Manager Rick Noble, Seabrook would have taken cores using the newly adopted ACI 349 criteria and found the ASR under the MR program "sooner or later." It is a matter of speculation if and when that would have occurred absent the license renewal initiative.

So, in response to the C-10 question, we can say that Seabrook likely would have found the ASR by adopting the latest industry standards as a result of industry initiatives. Unfortunately, I am not aware of any NRC initiatives that would have driven the issue. There should be. ACI 349 was written in the mid 1990's in response to the maintenance rule and to specifically upgrade the structures monitoring program. It is not clear the NRC's initial or subsequent inspections of the maintenance rule programs adequately covered structures monitoring - NRC missed the failure to scope the ITS/DTS into the program at Seabrook. I am willing to help develop an OP Exp smart sample to better inform our MR inspections.

While this helps address the C-10 question specific to ASR, we still need to address the broader question on upgrading to industry standards.

Bill



From: Conte, Richard (R)
Sent: Tuesday, December 27, 2011 12:50 PM
To: Barkley, Richard; Dean, Bill; Lew, David
Cc: Burritt, Arthur; Plasse, Richard; Miller, Ed; Raymond, William; Pinkham, Laurie; Matakas, Gina; Modes, Michael; Chaudhary, Suresh; Miller, Chris; Wilson, Peter; Gray, Harold
Subject: RE: New Letter in from C-10

What is absolutely amazing is, if they didn't read our reports and the TIA they would have any questions yet they criticize us for weaknesses in our oversight (not sure if this referral matter or not).

Some preliminary facts for Rich Barkley's benefit:

Question 1 on Would they have detected the degradation if it wasn't for license renewal and if the question is yes there are a whole bunch of other questions and if no, will the industry and NRC revise its inspection and testing programs so as to detect concrete degradation in the future.

- This is a speculative question, perhaps we should decide whether we would speculate or not.

- We can say that the latest ACI standard (349-3R, Evaluation of Existing Nuclear Safety-Related Concrete Structures) does look for evidence of ASR. I believe DRP has some inside information that an outside group was pushing them to use it even before license renewal. However, we will be soon find us right back to the question of why there isn't an automatic upgrading of standards used in the CLB or Quality Assurance Program. She makes some assertions on the need to use latest ASTM standards. The simple answer is we would have to go through a backfit analysis for such upgrading. Since they are not compliance backfits, then a cost benefit vs safety analysis would be needed. SRAs may have more on this topic.

- Perhaps we can focus on the information notice and the stated reasons we issued it.

Question 2 Is about whether the TIA has been answered. The answer is no and when it is answered it will be publicly released. Expected time frame is February 2012.

Question 3 is about the public being denied access to material that would be otherwise available because Seabrook's owner has enabled NRC headquarters staff to access material remotely. The answer is that material would not normally available since it is owner controlled information that is normally kept on site. The access was permitted on voluntary basis in the interest of efficiency on a rapidly developing situation - some of the information is not finalized and is work in progress in order to give NRC staff a sense of direction they are heading. The licensee's engineering evaluation on the problem will be publicly available through the license renewal process.

From: Barkley, Richard *RB*
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Richard S. Barkley, PE
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