

April 22, 2014

MEMORANDUM TO: FILE

FROM: Nadiyah S. Morgan, Project Manager */RA/*
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulations

SUBJECT: PILGRIM NUCLEAR POWER STATION – SUMMARY OF
TELEPHONE CONFERENCE REGARDING THE VERBAL
AUTHORIZATION OF RELIEF REQUEST PRR-25, REVISION 1
(TAC NO. MF3558)

This memorandum summarizes the telephone discussion on March 26, 2014, between the U.S. Nuclear Regulatory Commission (NRC) staff and Entergy Nuclear Operations, Inc., the licensee. The discussion was in regard to the licensee's request for relief PRR-25, Revision 1 for Pilgrim Nuclear Power Station (Pilgrim). Participants in the discussion included:

<u>NRC</u>		<u>Licensee</u>	
Dee Morgan	Ray McKinley	John Dent	Frank Clifford
Ben Beasley	Niklas Floyd	Steve Verrochi	Dave Mannai
John Tsao	Max Schneider	Ted Bordelon	Walter Lobo
Dave Alley		Bruce Chenard	Hamil Grimes
Tim Lupold		Frank McGinnis	Murray Williams
		Steve Scott	Ray Pace
		Joe Weicks	Ron Williams

By letter dated March 5, 2014 (Agencywide Document and Access Management System (ADAMS) Accession No. ML14073A059), as supplemented by letter dated March 25, 2014 (ADAMS Accession No. ML14091A407), the licensee requested relief from certain requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI for Pilgrim. The licensee proposed an alternate repair for leaking spool JF29-8-4 of the salt service water system piping, as documented in PRR-25, Revision 1.

The licensee developed its proposed alternative in response to leakage from the subject component which placed the plant in a Technical Specification Action Statement due to flooding concerns. The licensee's proposed alternative consists of mitigating the observed leakage from the subject component using a non-ASME Code compliant weld repair in conjunction with a seismically qualified mechanical clamp. As reported in its submission, the licensee performed stress calculations which demonstrated that the piping, with or without the attempted welded repairs or mechanical clamp, was structurally sound. The licensee will perform daily walkdowns and ultrasonic examination of the wall thickness of the repaired area (outside the clamp area) every 30 days, which is a condition of approval of this request. The licensee's proposed alternative is temporary and will be repaired/replaced in accordance with ASME Code requirements, not later than its next refueling outage, which is currently scheduled for April 2015.

Based on an evaluation of the information submitted, the NRC staff has determined that the proposed alternative provides reasonable assurance of the structural integrity of the subject degraded salt service water system piping. The NRC staff also determined that complying with the specified ASME Code requirement would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. Accordingly, the NRC staff has concluded that the licensee has adequately addressed all of the regulatory requirements set forth in Title 10 of the *Code of Federal Regulations* Section 50.55a(a)(3)(ii). Therefore, on March 26, 2014, the NRC staff authorizes the use of PRR-25, Revision 1 at Pilgrim, not longer than the next scheduled refueling outage in April 2015.

All other requirements of ASME Code, Section XI for which relief was not specifically requested and authorized by the NRC staff remain applicable, including the third party review by the Authorized Nuclear In-service Inspector.

This verbal authorization does not preclude the NRC staff from asking additional clarifying questions regarding Relief Request PRR-25, Revision 1 while preparing the subsequent written safety evaluation.

The licensee did not have any comments or concerns.

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Based on an evaluation of the information submitted, the NRC staff has determined that the proposed alternative provides reasonable assurance of the structural integrity of the subject degraded salt service water system piping. The NRC staff also determined that complying with the specified ASME Code requirement would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. Accordingly, the NRC staff has concluded that the licensee has adequately addressed all of the regulatory requirements set forth in Title 10 of the *Code of Federal Regulations* Section 50.55a(a)(3)(ii). Therefore, on March 26, 2014, the NRC staff authorizes the use of PRR-25, Revision 1 at Pilgrim, not longer than the next scheduled refueling outage in April 2015.

All other requirements of ASME Code, Section XI, for which relief was not specifically requested and authorized by the NRC staff remain applicable, including the third party review by the Authorized Nuclear In-service Inspector.

This verbal authorization does not preclude the NRC staff from asking additional clarifying questions regarding Relief Request PRR-25, Revision 1 while preparing the subsequent written safety evaluation.

The licensee did not have any comments or concerns.

Docket No. 50-293

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