

January 11, 2000

Mr. Theodore A. Sullivan
Vice President Nuclear and Station Director
Entergy Nuclear Generation Company
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) REGARDING TECHNICAL SPECIFICATION CHANGE REQUEST FOR ON-SITE FUEL STORAGE REQUIREMENTS FOR THE EMERGENCY DIESEL GENERATORS, PILGRIM NUCLEAR POWER STATION (TAC NO. MA5392)

Dear Mr. Sullivan:

By letter dated May 5, 1999, you requested a change to Pilgrim Nuclear Power Station's (Pilgrim) Technical Specification Section 3.9.a.3, "AUXILIARY ELECTRICAL EQUIPMENT," Section 4.9.A.1, "AUXILIARY ELECTRICAL EQUIPMENT SURVEILLANCE," and the associated Bases section. In addition, you proposed to modify the licensing basis for the Class I emergency diesel generator (EDG) on-site fuel storage requirements. The Updated Final Safety Analysis Report (UFSAR) will be amended to include the Class II Station Blackout Diesel Generator (SBODG) on-site storage tanks as a source of fuel for 7 days of continuous operation of both EDGs at rated loads following an event. The NRC has reviewed this submittal and determined that additional information is needed to complete the review. Enclosed is the staff's RAI. We request that you respond by January 30, 2000, as discussed with and agreed upon by Stephen Brennon of your staff.

Questions regarding this request should be sent to my attention at the above address or you can contact me at (301) 415-1445.

Sincerely,

/RA/

Alan B. Wang, Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-293

Enclosure: Request for Additional Information

cc w/encl: See next page

Mr. Theodore A. Sullivan
Vice President Nuclear and Station Director
Entergy Nuclear Generation Company
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REQUEST FOR ADDITIONAL INFORMATION

PILGRIM NUCLEAR POWER STATION, UNIT NO. 1

The current licensing basis for the emergency diesel generator (EDG) on-site fuel storage requirement is 19,800 gallons of fuel stored in each of the EDG tanks. The 19,800-gallons requirement was intended to be sufficient capacity to meet the EDG fuel requirements for 7 days of continuous operation. During the review of the EDG design basis information, the 19,800 gallon volume per EDG was determined to be insufficient for 7 days of operation and the cross-connection between the EDG tanks was determined to be non-single failure proof. As such, Entergy Nuclear Generation Company (the licensee) has proposed to amend the licensing basis for the EDG on-site diesel storage requirements to credit the fuel in the Station Blackout diesel generator (SBODG) storage tanks. The licensee has stated that the proposed changes are based on Regulatory Guide (RG) 1.137, Rev.1 (10/1979) and ANSI N 195(ANS-59.51)- 1976. The staff has determined that the following information is needed to complete the review

- 1) As you want to credit the SBODG storage tanks for safety-related applications, we need additional information regarding the design, construction, and maintenance of these tanks. In particular we need the following information:
 - a) These SBODG tanks are Code Class II. What are the major differences between these tanks and the Code Class I EDG tanks with regards to design and construction? Do the SBODG tanks meet the RG guidance and ANSI requirements required for the EDG storage tanks? Will these tanks be included in your QA program as safety-related components?
 - b) Are the maintenance requirements for the SBODG tanks similar or equivalent to the EDG tanks?
 - c) What corrosion protection is provided for the SBODG tanks, piping, fittings etc.?
- 2) Will the fuel in the SBODG tanks be maintained and sampled like the fuel in the EDG tanks? How often do you flush the SBODG tanks?
- 3) Provide a copy of Attachment 10 of Procedure 2.2.8. Also, provide the supporting procedures for Attachment 10 for the 4 concurrent actions (ordering of fuel, load shedding, shut down one EDG and transfer fuel from tank, and transfer of oil from SBODG tanks). Is there a preferred order of priority for the options to refill the EDG tanks?
- 4) The transfer of fuel from the SBODG tank is by air-driven pump and hoses independent of station electrical systems. What is the source of air for the pump? Is it safety grade? If not what other sources of air are available for the pump or are other pumps available for backup?
- 5) What are the instrumentation requirements for the EDG tanks? Is there low level indication for minimum level? Do the SBODG tanks have instrumentation? How do you assure the required minimum level in the SBODG tanks?

PD I-2 DOCUMENT COVER PAGE

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SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI)
REGARDING TECHNICAL SPECIFICATION CHANGE
REQUEST FOR ON-SITE FUEL STORAGE
REQUIREMENTS FOR THE EMERGENCY DIESEL
GENERATORS, PILGRIM NUCLEAR POWER STATION
(TAC NO. MA5392)

ORIGINATOR: A. WANG

SECRETARY: V. WILLIAMS

DATE: November 28, 2007

●●● ROUTING LIST ●●●

	NAME	DATE
1.	<u>AWang</u>	<u>/ /00</u>
2.	<u>TClark</u>	<u>/ /00</u>
3.	<u>JClifford</u>	<u>/ /00</u>
4.	<u>Secretary/dispatch</u>	<u>/ /00</u>

Considered others impacted by staff action (2.206 petitions, open allegations, Congressional or public inquiries, significant enforcement actions, inspection activities, Commission policies, staff positions, Owners Group activities): Yes ___ No ___ NA ___ Initial: PM ___ PD ___
Communicated w/identified stakeholder(s): Yes ___ No ___ NA ___ Initial: PM ___ PD ___

Licensee assessment considered: PM ___ / PD ___

Can Document be Deleted after Dispatch? _____