

IPRenewal NPEmails

From: Kimberly Green
Sent: Wednesday, April 23, 2008 10:30 AM
To: STROUD, MICHAEL D; dyner@entergy.com
Subject: Draft RAIs on Metal Enclosed Buses and Fire Penetration Seals
Attachments: RAI Set 12 - MEB and FP.doc

Mike and Donna,

Attached are two draft RAIs. Please review and let me know if you need a telecon to discuss them.

Thanks,

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Recipients:
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**INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3
LICENSE RENEWAL APPLICATION
DRAFT REQUEST FOR ADDITIONAL INFORMATION (D-RAI)
METAL ENCLOSED BUSES AND FIRE PROTECTION**

D-RAI 3.6.2.3-1

LRA Table 3.6.1, under Item Number 3.6.1-10, “Metal enclosed bus – Enclosure assemblies,” states that the only elastomers are access door gaskets, and are considered consumables. NUREG-1801, Volume 2, Item VI.A-12 identifies elastomers as a commodity type that requires an aging management review (AMR). Confirm that for in-scope metal enclosed buses, there are no other elastomers or gaskets other than the access door gaskets. For access door elastomers, provide a technical justification of why these components are excluded from an AMR.

D-RAI 3.0.3.2.7-2

LRA Section B.1.13, “Fire Protection,” states that, “...the fire barrier inspection requires periodic visual inspection of fire barrier penetration seals, fire barrier walls, ceilings, and floors, and periodic visual inspection and functional tests of fire rated doors to ensure that their operability is maintained...” The Fire Protection AMP does not specify any exceptions or enhancements to the GALL AMP regarding the penetration seal inspection during the period of extended operation.

In response to RAI 3.0.3.2.7-1 in a letter dated March 12, 2008, Entergy states that fire stops (penetration seals) are visually inspected at least once every seven operating cycles (15% every 24 months). During an audit, the NRC staff reviewed bases documents (for Indian Point Unit 3) associated with the fire protection AMP. One of the bases documents states that 15% of fire seals located in fire barriers are demonstrated to be operable by visual inspection on a frequency of 24 months. However, for those penetration seals that are inaccessible, the frequency of inspection is given as “not required.”

Justify the lack of visual inspections of inaccessible penetration seals.