

October 16, 2001

Mr. Andrew Drake, Project Manager
Westinghouse Owners Group
Westinghouse Electric Company
Mail Stop ECE 5-16
P.O. Box 355
Pittsburgh, PA 15230-0355

SUBJECT: INTERPRETATION OF THE WELD INSPECTION REQUIREMENTS FOR
RISK-INFORMED INSERVICE INSPECTION PROGRAM AS DESCRIBED IN
WCAP-14572 AND ITS ASSOCIATED SAFETY EVALUATION

Dear Mr. Drake:

By letter dated March 8, 2001, the Westinghouse Owners Group (WOG) stated to the NRC a concern regarding the NRC staff's review of risk-informed inservice inspection (ISI) programs using the WOG methodology described in WCAP-14572, "Westinghouse Owners Group Application of Risk-Informed Methods to Piping Inservice Inspection Topical Report." Specifically, the WOG objected to the staff's imposition of a requirement to inspect a minimum of 10 percent of Class 1 butt welds. The letter further stated that the WOG viewed the imposition of the minimum number of inspections as outside the explicit bases stated in the NRC safety evaluation (SE) for the topical report (TR), an unwarranted and unnecessary regulatory burden, and of no additional safety benefit for the aggregate of licensees. The letter requested that the staff review current and new WOG TR submittals using criteria consistent with the explicit conditions of the SE for the TR.

The staff evaluated the issues raised in the WOG letter and discussed them in several meetings and phone conversations with the WOG. During these interactions, the staff informed the WOG that making certain changes to the template submittals for plants that follow the WOG risk-informed ISI methodology would provide additional information that would allow the staff to assess the acceptability of the evaluation without requiring inspection of a minimum of 10 percent of the butt welds.

By letter dated August 7, 2001, the WOG provided to the NRC a revised example template submittal. The staff has reviewed this submittal and has found that, if closely followed, the revised template provides the required additional information. Therefore, the staff does not believe a fixed minimum number of butt weld inspections is necessary for current and future submittals of risk-informed ISI programs that follow the WCAP-14752 methodology and are consistent with the revised example template submittal provided in the WOG's August 7, 2001, letter.

The staff considers the issues and concerns raised in the WOG's March 8, 2001, letter to be resolved. This letter completes work under TAC No. MB1857.

Mr. Andrew Drake

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Please contact Mike Scott of my staff at (301) 415-1421 should you have any questions regarding this letter.

Sincerely,

/RA/

Stephen Dembek, Chief, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Project No. 694

cc: Mr. H. A. Sepp, Manager
Regulatory and Licensing Engineering
Westinghouse Electric Company
P.O. Box 355
Pittsburgh, PA 15230-0355

Mr. Andrew Drake

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