April 9, 2002

Mr. Michael A. Krupa Director Nuclear Safety & Licensing Entergy Operations, Inc. 1340 Echelon Parkway Jackson, MS 39213-8298

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 - REQUEST FOR ADDITIONAL INFORMATION REGARDING PROPOSED ALTERNATIVE TO AMERICAN SOCIETY OF MECHANICAL ENGINEERS BOILER AND PRESSURE VESSEL CODE EXAMINATION REQUIREMENTS FOR REPAIRS PERFORMED ON REACTOR VESSEL HEAD PENETRATIONS (TAC NO. MB4264)

Dear Mr. Krupa:

By letter dated February 28, 2002, you requested relief from performing examinations of base material weld repairs made to reactor pressure vessel (RPV) nozzles as required by American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code), Section XI IWA-4331(a) and Section III NB-2539-4. Request No. W3-R&R-001, Revision 0, proposed to perform inspections of the outer bare metal surface of the RPV nozzle penetrations for evidence of leakage.

During the course of review of this request, the staff determined that additional information is necessary to complete our review. The enclosed request for additional information (RAI) was e-mailed to your licensing staff on March 27, 2002, and discussed during a telephone call on the same day. Your staff agreed to respond within 30 days of the receipt of this RAI. If circumstances result in the need to revise the target date, please call me at the earliest opportunity.

Sincerely,

/**RA**/

N. Kalyanam, Project Manager, Section 1 Project Directorate IV Division of Licensing Project Management Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosure: As stated

cc: See next page

REQUEST FOR ADDITIONAL INFORMATION

PROPOSED ALTERNATIVE TO ASME EXAMINATION REQUIREMENTS FOR

REPAIRS PERFORMED ON REACTOR VESSEL HEAD PENETRATIONS

TAC NO. MB4264

- 1. It is not clear to what portion of the control element drive mechanism (CEDM) the alternative would apply. Please provide figures and/or dimensions which show where and how the alternative will be applied. Please identify the scope of the alternative does it apply to the CEDM penetration, its inner diameter or outer diameter surface, or the j-groove weld. Please provide a detailed discussion for its application.
- 2. Related to the discussion on typical base material repair, it is not sufficient to provide a discussion of what "typical" repairs include. Please clearly state what you will do, in each of the situations cited above. If certain Code required activities are not planned to be done, the request must specifically identify each of those activities and request relief from them. Please specify specific subparagraphs/sentences in Code Waterford 3 needs relief from and provide an alternative to each one with supporting data.
- 3. Your application does not provide a description or discussion on where and how much weld will be deposited on the repair, the material that will be used, or the finished configuration. This needs to be provided. Figures which depict the repair configuration would be helpful.
- 4. This submittal appears to propose an alternative repair to the j-groove weld that does not include a cap or weld overlay over the j-groove weld. Instead, the alternative appears to be reliant on Section XI flaw evaluations and ultrasonic examination capability. If this is the case, this alternative is a significant departure from those previously submitted and, given the lack of detailed information in the submittal and the time required to review this new methodology, an approval in the required time frame may not be possible.
- 5. If Waterford 3 wants the staff to review this alternative, it needs to submit detailed information regarding its flaw evaluation method and criteria, as well as a demonstration of its ultrasonic examination capabilities to detect and characterize flaws in the j-groove weld region before the staff can evaluate the efficacy of the alternative. Alternately, Waterford 3 may propose a repair methodology consistent with what was previously submitted by other licensees, or in accordance with the Westinghouse generic embedded flaw and temper bead weld approaches which were recently submitted and under review by the staff for evaluation and approval, for their immediate needs.

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Sincerely, /RA/ N. Kalyanam, Project Manager, Section 1 Project Directorate IV **Division of Licensing Project Management** Office of Nuclear Reactor Regulation Docket No. 50-382 Enclosure: As stated cc: See next page DISTRIBUTION PDIV-1 r/f PUBLIC Rids OgcRp **RidsNrrPMNKalyanam** RidsAcrsAcnwACRS RidsNrrDlpmLpdiv1 (RGramm) RidsNrrLADJohnson RidsRgn4MailCenter (KBrockman) DNuajock TChan Accession No.: ML020990292 PDIV-1/LA PDIV-1/PM OFFICE PDIV-1/SC NAME NKalyanam DJohnson RGramm

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DATE

Waterford Generating Station 3

cc:

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