

**APPENDIX A**  
**JAMES A. FITZPATRICK NUCLEAR POWER PLANT**  
**SUBSECTION IWE COMPARISON TABLE**

**APPENDIX A -- JAMES A. FITZPATRICK NUCLEAR POWER PLANT -- IWE COMPARISON**

IWE Paragraph (1992 Ed.)	Changes between IWE 1992 Edition/Addenda. and the 1998 Edition	Licensee's statement of significance and/or basis for use as an alternative examination	Comments
1100	No change	N/A	
1200	No change	N/A	
1210	No change	N/A	
1220	Changed "containment" to "containment system"	Nonsignificant	Editorial change has no safety or quality significance. Acceptable.
1230	No change	N/A	
1231	<p>Removed item 3) - "single welded butt joints from the weld side" - as a specific item required to remain accessible for the life of the plant.</p> <p>Changed wording from "80% of the surface area" to "80% of the pressure retaining boundary" and stated exclusions from that 80%.</p> <p>Reworded paragraph b).</p>	<p>These single welded butt joints were removed as a separately listed examination item and are now included within the item for the pressure retaining boundary as discussed in the changes to Table IWE-2500-1, Item E1.10 below.</p> <p>The exclusions from 80% incorporate an existing Table IWE 2500-1 note and clarify that areas made inaccessible during construction are also excluded.</p> <p>Change to b) is for clarity and is nonsignificant.</p>	<p>Examination of welds is optional in 10 CFR 50.55a. Acceptable.</p> <p>Wording of IWE-1231 changed to be consistent with the existing Table IWE 2500-1 and its note. Acceptable.</p> <p>Editorial change has no safety or quality significance. Acceptable.</p>

IWE Paragraph (1992 Ed.)	Changes between IWE 1992 Edition/Addenda. and the 1998 Edition	Licensee's statement of significance and/or basis for use as an alternative examination	Comments
1232	<p>ASME XI generic change from repair and/or replacement to repair/replacement activities.</p> <p>Deleted paragraph (a)(3) addressing inaccessible welded joints.</p>	<p>Nonsignificant</p> <p>Welded joints were removed as a separately listed examination items and are now included within the item for the pressure retaining boundary as discussed in the changes to Table IWE-2500-1 below.</p>	<p>Editorial change has no safety or quality significance. Acceptable.</p> <p>Examination of welds is optional in 10 CFR 50.55a. Acceptable.</p>
1241	<p>Added stiffeners in IWE-1241(a) and, by added reference to IWE-2420(b), flaws accepted by evaluation as areas requiring augmented examination.</p>	<p>The additional areas subject to augmented examination further assure containment integrity.</p>	<p>Adding stiffeners in IWE-1241(a) requiring examination and adding reference to IWE-2420(b) further assure containment integrity. Acceptable.</p>
1240	<p>No Change</p>	<p>N/A</p>	
1242	<p>Changed IWE-2500(b) to IWE-2500(c)</p>	<p>Nonsignificant</p>	<p>Acceptable.</p>
2000	<p>No change</p>	<p>N/A</p>	
2100	<p>Added new Subarticle 2100 - "General" - to provide reference to IWA-2000 with exceptions from IWA-2210, 2300, 2500 and 2600.</p>	<p>The additional general requirements invoked by reference to IWA-2000 where none were referenced previously further assure containment integrity. The exceptions provided are significant</p>	<p>By adding additional general requirements of IWA-2100, further assure containment integrity. Also, IWE-2310, 1998 covers the visual examinations as identified in IWA-2210. Acceptable</p>

IWE Paragraph (1992 Ed.)	Changes between IWE 1992 Edition/Addenda. and the 1998 Edition	Licensee's statement of significance and/or basis for use as an alternative examination	Comments
		in that related requirements have been incorporated into IWE-2310, 2320 and 2330. These changes are discussed below. JAFNPP's visual examination requirements are defined in Relief Request RR-27, Proposed Alternatives, item 1).	Per the 1998 Code, personnel will not have to be certified to CP-189 (IWA-2300) - Licensee committed to certify inspection personnel in accordance with CP-189 in accordance with the 1992 Addenda, IWA-2300 requirements since July 1, 2001. Acceptable.
2200	<p>Deleted paragraph c) which provided allowances for the use of shop or field examinations in lieu of on site preservice examinations.</p> <p>Deleted paragraph g) which required the condition of new coating to be documented in the preservice examination record.</p> <p>ASME XI generic change from repair and/or replacement to</p>	<p>The deletion of an allowance for an alternative examination ensures that proper preservice examinations are performed and documented.</p> <p>The deletion of the requirement to document the condition of "new" non-pressure retaining coatings in the preservice examination record provides for more efficient program implementation without affecting component integrity. JAFNPP's coating procedure covers containment coating applications without the need for an additional Code examination.</p> <p>Nonsignificant.</p>	<p>The deletion of paragraph (c) ensures that proper preservice examination is performed per Table IWE-2500-1. Acceptable.</p> <p>See discussion under Paragraph 2500 for additional discussion on JAFNPP's coatings program. Acceptable.</p> <p>Editorial change has no safety or quality significance. Acceptable.</p>

IWE Paragraph (1992 Ed.)	Changes between IWE 1992 Edition/Addenda. and the 1998 Edition	Licensee's statement of significance and/or basis for use as an alternative examination	Comments
	repair/replacement activities.		
2300	Added new Subarticle 2300 - "Visual Examination, Personnel Qualification and Responsible Individual."	The paragraphs within this Subarticle are considered significant and contain requirements that either did not previously exist or that were contained in other areas. Placing these requirements within Article IWE-2000 further ensures proper "Examination and Inspection" of areas important to containment integrity and provides consistency with Subsections IWB, IWC and IWD. The specific paragraphs added are discussed below. JAFNPP has submitted additional commitments, as detailed in Relief Request RR-27. Reference to the applicable additional commitments are identified in the discussion below.	IWE 2300 - "Visual Examination, Personnel Qualification and Responsible Individual," is newly added Subarticle. See comments regarding IWE-2310, IWE-2320, and IWE-2330.
2310	Added new paragraph 2310 - Visual Examinations - which a) states that the owner shall define requirements for visual examination of containment surfaces;	a) Adding requirements for the owner to define visual examination requirements provides for more efficient containment ISI program implementation by allowing examinations that may be more	Consistency with existing ISI visual examination requirements provide for an efficient internal program; that coupled with the program established for JAFNPP should provide uniformity and consistency

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	<p>b) and c) define general and detailed visual examinations; and</p>	<p>consistent with existing ISI, containment coating, maintenance rule and Appendix J programs.</p> <p>JAFNPP's visual examination requirements are defined in Relief Request RR-27, Proposed Alternatives, item 1).</p> <p>b) and c): The general visual examination is performed to indicate the general condition of the containment. The detailed visual examination is performed to determine the magnitude and extent of any deterioration or distress. Referring to visual examinations by new general visual and detailed visual terms does not adversely affect the integrity of the containment components examined. The provisions of JAFNPP's general visual and detailed visual examinations are defined in Relief Request RR-27, Proposed Alternatives, item 1).</p>	<p>industry wide. The 1998 Code with the specific commitments in the September 7, 2001, submittal are acceptable.</p> <p>The 1998 Edition does not specify acceptance criteria since the examination requirements are defined by the owner. The staff does not find this to be acceptable. The licensee provided specific acceptance criteria for the general and detailed visual examinations in its September 7, 2001, submittal. This is acceptable.</p>

IWE Paragraph (1992 Ed.)	Changes between IWE 1992 Edition/Addenda. and the 1998 Edition	Licensee's statement of significance and/or basis for use as an alternative examination	Comments
	d) and e) provides the requirements for the conditions of areas affected by repair/replacement activities, painted or coated areas, and non-coated areas.	d) and e): Previously these examination requirements did not exist within Article IWE-2000 but rather only in the acceptance criteria of Article IWE-3000. Adding these specific attributes here ensure proper containment examinations. JAFNPP's acceptance criteria for general and detailed visual examination further define the examination criteria to be used. The JAFNPP acceptance criteria are defined in Relief Request RR-27, Proposed Alternatives, item 3).	Adding these specific attributes ensure proper containment examinations. Also, the licensee provided specific acceptance criteria for the general and detailed visual examinations in its September 7, 2001, submittal. Acceptable.
2320	<p>Added new paragraph 2320 - "Responsible Individual" - in which</p> <p>a) states the qualification requirements of the Responsible Individual and</p> <p>b) defines the responsibilities of the Responsible Individual for the development of plans and procedures; instruction, training and approval of visual examination personnel; performance or direction</p>	<p>a) The details for the Responsible Individual qualification requirements were previously contained in the acceptance standards of IWE-3510.1.</p> <p>b) The added detailed responsibilities for the Responsible Individual ensure proper performance of those related activities. Having an individual possessing the qualifications</p>	<p>This is editorial change. Acceptable.</p> <p>The duties identified must be performed regardless of who is assigned to do them. However, the philosophy of the 1998 Edition give the responsible individual complete control over the program.</p>

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	of visual examinations; evaluation of results and documenting results.	described in paragraph 2320 a) performing the responsibilities defined in paragraph 2320 b) ensures the reliable detection of conditions adverse to containment integrity.	This provides consistency in all the plan and procedure; performance and direction of examination; evaluation of results and documentation. Acceptable.
2330	<p>Added new paragraph 2330 - "Personnel Qualification" - which a) states that the owner is responsible for defining the qualification requirements for personnel performing visual examinations and</p> <p>b) provides minimum qualification requirements that were previously contained in the acceptance criteria of IWE-3510.1.</p>	<p>a) Adding requirements for the owner to define personnel qualification requirements provides for more efficient containment ISI program implementation by permitting personnel performing containment examinations to be qualified to written practices that are more consistent to those used for other NDE personnel. JAFNPP's personnel qualification requirements are defined in Relief Request RR-27, Proposed Alternatives, item 1).</p> <p>b) Providing these details in the qualification requirement paragraph focuses the containment visual qualification on areas important to containment integrity. JAFNPP's personnel qualification and examination provisions that</p>	<p>The staff finds owner-defined personnel qualification requirements to be unacceptable. Personnel should be qualified in accordance with Subsection IWA requirements. The licensee states that personnel will be qualified in accordance with CP-189 since July 1, 2001. This is acceptable.</p> <p>Use of the 1998 Edition is unacceptable without additional commitments from the licensee. The licensee provided the qualification requirements for direct and remote visual examinations in its September 7,</p>

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		supplement the Code requirements are defined in Relief Request RR-27, Proposed Alternatives, item 1).	2001, submittal. This is acceptable.
2400	No change	N/A	
2410	No change	N/A	
2411	Deleted a subparagraph discussing decreasing and extending inspection periods.	The deleted subparagraph eliminates duplication with IWA-2400.	The deleted subparagraph requirements are similar to as of IWA-2400. The Code 1998 Edition invokes the requirements of IWA-2400 under newly added paragraph IWE-2100. This is acceptable.
2412	Deleted a subparagraph discussing decreasing and extending inspection periods. Added a subparagraph detailing requirements for the scheduling of added welds or components.	The deleted subparagraph eliminates duplication with IWA-2400. The added requirements for the scheduling of added welds or components was added prior to the 1998 Edition rewrite of Subsection IWE and is of marginal value with the 1998 revisions to Table IWE-2500-1 (refer to the evaluation in this table).	The deleted subparagraph requirements are similar to as of IWA-2400. The Code 1998 Edition invokes the requirements of IWA-2400 under newly added paragraph IWE-2100. This is acceptable.
2420	Revised (b) to remove repaired areas as areas requiring	Repaired areas that are likely to experience accelerated degradation	Changing duration of reexamination of areas that remain

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	<p>reexaminations during the next successive inspection period.</p> <p>Changed (c) to require that areas which remain essentially unchanged for the next inspection period no longer require augmented examinations. The 1992 Addenda required three consecutive examinations to reach this conclusion.</p>	<p>and aging are already subject to augmented examinations per IWE-1241. Some repairs may be located in non- augmented areas and may be necessary to correct physical damage caused by construction or craft activities. Not having to repeat examinations of these non augmented repaired areas provides for more efficient program implementation without adversely affecting component integrity.</p> <p>This is now consistent with Class 2 successive inspections. The engineering evaluation of IWE-3122.3, along with the reexamination in the next inspection, is sufficient to assure that augmented examinations need not be continued.</p>	<p>essentially unchanged from "three consecutive inspection periods" to "the next successive inspection period" is consistent with the requirements for Class 2 components. Acceptable.</p> <p>Changing duration of reexamination of areas that remain essentially unchanged is consistent with the requirements for Class 2 components. Acceptable</p>
2430	Deleted the paragraph - Additional Examinations - which discussed adding examination items of the same category if flaws or areas of degradation are identified during an examination.	The changes to Table IWE 2500-1 eliminate several examination categories. The categories that remain all require 100% examination. Therefore no items are available for additional examinations.	The 1998 Code does not rely on sampling as 100% of the containment surface is already examined. Therefore, elimination of this requirement is appropriate. Acceptable.

IWE Paragraph (1992 Ed.)	Changes between IWE 1992 Edition/Addenda. and the 1998 Edition	Licensee's statement of significance and/or basis for use as an alternative examination	Comments
2500	<p>Reworded the existing subparagraphs consistent with the previous paragraph changes and with Table IWE-2500-1 changes.</p> <p>Deleted the requirement to examine paint or coatings prior to removal.</p>	<p>The reworded subparagraphs add clarity and provide consistency within IWE.</p> <p>The 1998 Edition increases the frequency of examination when compared to the 1992 Addenda. During examinations, the general and detailed visual examinations of coated areas will identify flaws and degradation in the containment base metal and result in appropriate corrective actions per the Code requirements. Should a coating be removed between required inservice inspections, the JAFNPP nuclear coatings pre-application inspections, and nonconformance and corrective action programs, would identify and resolve any base metal conditions that could challenge the structural integrity of the containment. As a result, there is no anticipated benefit from a separate Code requirement to inspect coatings prior to removal.</p>	<p>The rewording of the subparagraph provides consistency between the paragraph IWE-2500 and Table IWE-2500-1. Acceptable.</p> <p>Elimination of the paint or coatings examination prior to removal has been found acceptable provided adequate provisions exist in the licensee's program to examine the base metal prior to reapplication of the coating. The licensee adequately addressed base metal examination in its September 7, 2001, submittal.</p>

IWE Paragraph (1992 Ed.)	Changes between IWE 1992 Edition/Addenda. and the 1998 Edition	Licensee's statement of significance and/or basis for use as an alternative examination	Comments
	<p>Replaced the requirement for one-foot square grids in thickness measurements with a reference to Table IWE 2500-2.</p> <p>Added a reference to IWE-5000 for pressure tests.</p>	<p>This deletion provides for a more efficient program implementation without affecting component integrity.</p> <p>The new Table IWE 2500-2 provides more detailed requirements for thickness measurements and is discussed below.</p> <p>The added reference to IWE-5000 provides direction for the performance of pressure tests.</p>	<p>The ultrasonic gridline approach is a sampling methodology similar to that of other portions of the Code and other erosion/corrosion monitoring programs. Acceptable.</p> <p>Paragraph IWE-2500 is for "Examination and Pressure Test Requirements" and IWE-5000 is for "System Pressure Tests." Therefore, referencing IWE-5000 in IWE-2500 is streamlining the IWE. Acceptable.</p>
2600	Deleted a sentence discussing compatibility of paint and coating systems and a requirement to examine the new paint.	The removal of this sentence addressing "new" non-pressure retaining paint and coatings provides for more efficient containment ISI program implementation without adversely affecting component integrity. The compatibility of paint and coating systems with the existing system, and the	The deleted sentence regarding reapplied paint and coating refers to non-pressure retaining paint and coating. To be consistent, the compatibility of paint and coating systems with the existing system, and the examination of newly applied coatings, is addressed in the JAFNPP containment coating

IWE Paragraph (1992 Ed.)	Changes between IWE 1992 Edition/Addenda. and the 1998 Edition	Licensee's statement of significance and/or basis for use as an alternative examination	Comments
		examination of newly applied coatings, is addressed in the JAFNPP containment coating specification and procedures.	specification and procedures. Acceptable.
3100	Removed the word nondestructive from the heading.	Nonsignificant	This is an editorial change. Acceptable.
3110	No Change	N/A	
3111	Replaced the reference to Table IWE-3410-1 with a reference to Subarticle IWE-3500. Removed reference to paragraph IWE-3115.	Table IWE-3410-1 and paragraph IWE-3115 has been deleted and is discussed below. IWE-3500 adequately captures all of the information previously contained in the deleted table and paragraph.	This is an editorial change. Acceptable.
3112	Replaced the reference to Table IWE-3410-1 with a reference to subarticle IWE-3500. Replace the reference to IWA-6630 instead of IWA-6620. ASME XI generic change from repair and/or replacement to repair/replacement activities.	Nonsignificant	This is an editorial change. Acceptable.
3114	Replaced the reference to Table IWE-3410-1 with a reference to	Nonsignificant	This is an editorial change. Acceptable.

IWE Paragraph (1992 Ed.)	Changes between IWE 1992 Edition/Addenda. and the 1998 Edition	Licensee's statement of significance and/or basis for use as an alternative examination	Comments
	subarticle IWE-3500. ASME XI generic change from repair and/or replacement to repair/replacement activities.		
3115	Deleted subparagraph which addressed repair programs and evaluations being subject to review by authorities.	Nonsignificant - there were no submittal or retention requirements changed by the deletion of the subparagraph.	The regulations do not require the licensee to submit the containment inspection program. Acceptable.
3120	Removed the word nondestructive from the heading.	Nonsignificant	This is an editorial change. Acceptable.
3121	Removed the word nondestructive and deleted references to IWE-3124 and IWE-3125 for the acceptance of flaws for continued service.	The removal of nondestructive is nonsignificant. The referenced subparagraphs did not actually apply to the acceptance of flaws for continued service.	This is an editorial change. Acceptable.
3122	Replaced the references to Table IWE-2500-1 and to IWE-3000 with a reference to subarticle IWE-3500. Combining IWE 3122.2 and 3122.3, and IWE 3122.4 is renumbered as IWE 3122.3. ASME XI generic change from repair and/or replacement to repair/replacement activities. Reworded several sentences. Deleted sentence	Nonsignificant - the changes are for clarity and to reconcile paragraph numbering. There was no submittal or retention requirements changed by the deletion of the sentence addressing evaluation reviews.	This is an editorial change. Acceptable.

IWE Paragraph (1992 Ed.)	Changes between IWE 1992 Edition/Addenda. and the 1998 Edition	Licensee's statement of significance and/or basis for use as an alternative examination	Comments
	which addressed evaluations being subject to review by authorities.		
3124	Replaced the reference to Table IWE-3410-1 with a reference to subarticle IWE-3500. ASME XI generic change from repair and/or replacement to repair/replacement activities.	Nonsignificant	This is an editorial change. Acceptable.
3125	Deleted subparagraph which addressed repair programs and reexamination results being subject to review by authorities.	Nonsignificant - there were no submittal or retention requirements changed by the deletion of the subparagraph.	This is an editorial change. Acceptable.
3130	No change	N/A	
3200	Added a statement to the end of the paragraph that states supplemental surface or volumetric examinations are required when specified by the engineering evaluation.	The added statement clarifies requirements and eliminates potential duplication or contradiction of requirements in stating that the engineering evaluation requirements of IWE-3122 determine what and when supplemental examinations are required.	This is an editorial change. Acceptable.
3410	Replaced the reference to Table IWE-3410-1 with a reference to	Nonsignificant	This is an editorial change. Acceptable.

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	subarticle IWE-3500.		
3430	No change	N/A	
3500	No change	N/A	
3510	<p>Reconciled acceptance standards with the IWE-2300 changes discussed above and the Table IWE-2500-1 changes discussed below by:</p> <p>Adding the requirement that the owner shall define acceptance criteria for visual examination of containment surfaces;</p> <p>Removing the wording for Responsible Individual and for personnel qualifications;</p> <p>Combining 3510.2 and 3510.3 and</p>	<p>Previously examination requirements were contained in the acceptance standards of IWE-3500. This has been corrected by the addition of IWE-2300 as discussed above.</p> <p>This change directly corresponds to the addition of IWE-2310(a) discussed above. JAFNPP's visual examination acceptance criteria are defined in Relief Request RR-27, Proposed Alternatives, item 3).</p> <p>This change directly corresponds to the addition of IWE-2320 discussed above.</p>	<p>Owner-defined visual examination requirements do not provide uniformity and consistency industry wide. This is unacceptable unless the licensee provides specific acceptance standards. The licensee provided this information in its September 7, 2001, submittal. Acceptable.</p> <p>The licensee's visual examination acceptance criteria are defined in Relief Request RR-27, Proposed Alternatives, item 3). Acceptable.</p> <p>This is an editorial change to rearrange the paragraph. Acceptable.</p> <p>This is an editorial change to</p>

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	<p>removing specific VT-3 examination attribute wording; and</p> <p>Incorporating IWE-3511;3513,3514 and 3515 with changes into IWE-3510.</p> <p>By the incorporation of 3515 the acceptance standards for bolting were changed from referencing material specs and torque or tension limits to conditions affecting leak tight or structural integrity.</p>	<p>These changes directly correspond to the addition of IWE-2310(e)(1) and (2) discussed above.</p> <p>These changes correspond to the changes in the examination categories of Table IWE-2500-1 as discussed below and to the removal of examination requirements from the acceptance standards paragraphs.</p> <p>The resulting acceptance standards for bolting provide for more practical containment ISI program implementation without adversely affecting containment leak tight or structural integrity.</p>	<p>rearrange the paragraphs. Acceptable.</p> <p>This is an editorial change to rearrange the paragraph. Acceptable.</p> <p>The examination of bolting, seals and gaskets to determine their ability to maintain containment leak tight integrity as a separate inspection is considered unnecessary. The Appendix J, Type A test is considered sufficient for determining the leak-tight integrity of the penetration. Acceptable.</p>
3511	Deleted subparagraph which addressed examination category E-B.	Examination category E-B has been incorporated into examination category E-A per the changes to Table IWE-2500-1 discussed below.	Examination category E-B has been merged with E-A , which is consistent with the changes to Table IWE-2500-1. The details of changes in Table IWE-2500-1 are discussed below. Acceptable.

IWE Paragraph (1992 Ed.)	Changes between IWE 1992 Edition/Addenda. and the 1998 Edition	Licensee's statement of significance and/or basis for use as an alternative examination	Comments
3512	<p>Renumbered subparagraph to IWE-3511. Reconciled acceptance standards with the IWE-2300 changes discussed above and the Table IWE-2500-1 changes discussed below</p> <p>Added the requirement that the owner shall define acceptance criteria for visual examination of containment surfaces;</p> <p>Combined 3512.2 and 3512.3 with changes into 3511.2 and removed specific VT-1 examination attribute wording; and</p> <p>Reworded ultrasonic examination subparagraph and limited the UT to Class MC components.</p>	<p>The subparagraph was renumbered based on the deletion of previous IWE-3511 as discussed above. Previously examination requirements were contained in the acceptance standards of IWE-3500. This has been corrected by the addition of IWE-2300 as discussed above.</p> <p>This change directly corresponds to the addition of IWE-2310(a) discussed above. JAFNPP's visual examination acceptance criteria are defined in Relief Request RR-27, Proposed Alternatives, item 3).</p> <p>These changes directly correspond to the addition of IWE-2310(e)(1) and (2) discussed above and eliminate potential duplication or contradiction of requirements.</p> <p>This change eliminates the need to perform the UT examinations on</p>	<p>This is an editorial change as discussed in the comments column for IWE-3511. Acceptable.</p> <p>The licensee's visual examination acceptance criteria are defined in Relief Request RR-27, Proposed Alternatives, item 3). Acceptable.</p> <p>This is an editorial change to rearrange the paragraphs. Acceptable.</p>

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		metallic liners of Class CC components. JAFNPP will apply the provisions of IWE-3511.3 to both Class MC components and metallic liners of Class CC components, as stated in Relief Request RR-27, Proposed Alternatives, item 3).	Licensee states it will apply provisions of IWE-3511.3 to both Class MC and metallic liners of Class CC components. This is acceptable.
3513 3514 3515	Deleted subparagraphs IWE-3513, 3514 and 3515 which addressed examination categories E-D, E-F, and E-G, respectively.	Examination categories E-D, E-F and E-G have been incorporated into examination category E-A per the changes to Table IWE-2500-1 discussed below.	Acceptable. The regulations do not require the examination of containment welds.
4100	No change	JAFNPP's relief request does not include using the 1998 Edition of IWA-4000. JAFNPP will continue to use IWA-4000 from the 1992 Addenda as required by NRC clarification of the 10 CFR 50 regulations that mandated implementation of IWE and IWL.	
5200	No change	N/A	
5210	No change	N/A	
5220	ASME XI generic change from repair and/or replacement to repair/replacement activities.	Nonsignificant	Editorial change has no safety or quality significance. Acceptable.

IWE Paragraph (1992 Ed.)	Changes between IWE 1992 Edition/Addenda. and the 1998 Edition	Licensee's statement of significance and/or basis for use as an alternative examination	Comments
5221	ASME XI generic change from repair and/or replacement to repair/replacement activities. Removed the quotation of 10 CFR 50 Appendix J paragraph IV.A.	Nonsignificant - the requirement to meet the requirements of the Appendix J paragraph referenced is not affected by removing the quoted Appendix J paragraph IV.A..	Editorial change has no safety or quality significance. Acceptable.
5222	ASME XI generic change from repair and/or replacement to repair/replacement activities.	Nonsignificant	Editorial change has no safety or quality significance. Acceptable.
5240	Replaced a reference to IWA-5240 with requirements to perform detailed visual examination of repair/replacement areas during pressure tests.	The addition of specific IWE examination requirements during pressure testing in lieu of referencing IWA general requirements focuses requirements on issues specific to containment integrity and therefore provides added assurance of the integrity of repaired/replaced areas.	Referencing IWE-2310, visual examination in lieu of IWA-5240, visual examination provides more focuses on containment integrity than the general requirement (IWA-5240). Acceptable.
5250	Changed Corrective Measures to Corrective Action in the heading. ASME XI generic change from repair and/or replacement to repair/replacement activities.	Nonsignificant	Editorial change has no safety or quality significance. Acceptable.
7100	No change	N/A	

IWE Paragraph (1992 Ed.)	Changes between IWE 1992 Edition/Addenda. and the 1998 Edition	Licensee's statement of significance and/or basis for use as an alternative examination	Comments
Table 2411-1	No change	N/A	
Table 2412-1	<p>Replaced the separate entries for 1st and successive intervals with one entry for All intervals.</p> <p>Changed minimum and maximum examination completion percentages and added Note (1) which states that if the first period completion percentage for any examination category exceeds 34%, at least 16% of required examinations shall be performed in the second period.</p>	<p>Nonsignificant - The previous requirements for the 1st and successive intervals were identical. Therefore combining the entries does not affect any requirements.</p> <p>Provides more flexibility in scheduling examinations, but ensures allocation of examinations is done throughout the 10-year interval. The IWE change is consistent with changes made in IWB, IWC, IWD, and IWF.</p>	<p>Editorial change has no safety or quality significance. Acceptable.</p> <p>This change provides more flexibility in scheduling examination, but ensures full examination. Acceptable.</p>
Table 2500-1 Cat. E-A	E1.11 Revised frequency of examination from "prior to each type A test" to "100% during each period."	Removing the requirement to coordinate examinations with type A tests allows for more efficient containment ISI program implementation without adversely affecting containment integrity. The requirement to perform general visual examinations every inspection period increases the total number of examinations on the containment surface in the interval.	Removing the requirement to coordinate examinations with type A tests allows for more efficient containment ISI program implementation without adversely affecting containment integrity. Also, the requirement to perform general visual examinations every inspection period increases the total number of examinations on the containment surface in the

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	<p>E1.12 Re-designated item from "accessible surface areas" to "wetted surfaces of submerged areas." Replaced examination method VT-3 with general visual.</p>	<p>Replacing the accessible surface area designation (which is now included in E1.11) with wetted surface areas (which were previously included in E1.12 footnote 4) does not eliminate or reduce any required examination areas. The conditions of distress which would be detected by a VT-3 examination are the same conditions that would be detected by a general visual examination (refer to the evaluation of IWE-2300 above). The requirement to perform a detailed examination on any suspect area has not changed. The new requirement in item E1.11 to perform general visual examinations every inspection period increases the total number of examinations on the containment surface in the interval. The overall impact of this change is to increase the level of quality and does not adversely affect the safety of the containment inspection program.</p>	<p>interval. Acceptable.</p> <p>Acceptable with licensee's commitments for general visual examination requirements and acceptance criteria as stated in its September 7, 2001, submittal.</p>

IWE Paragraph (1992 Ed.)	Changes between IWE 1992 Edition/Addenda. and the 1998 Edition	Licensee's statement of significance and/or basis for use as an alternative examination	Comments
	<p>E1.20 Added BWR to item description. Replaced examination method VT-3 with general visual.</p> <p>E1.30 Added item for moisture barriers with a general visual required each period.</p> <p>All item no.'s - Replaced reference to IWE-3510 for examination requirements with IWE-2310.</p> <p>Notes - Revised to specifically include welds and bolting as part of the pressure retaining boundary requiring examination.</p>	<p>This item is not applicable to the JAFNPP containment.</p> <p>Moisture barriers were previously included in examination category E-D with a VT-3 required each interval. Examining moisture barriers more frequently will assure reliable detection of conditions adverse to containment integrity.</p> <p>Nonsignificant - Previously some examination requirements were contained in IWE-3500. They now exist in IWE-2300 as discussed above.</p> <p>Welds and bolting were previously included in examination categories E-B, E-F and E-G. Including these items in the examination category for the containment pressure retaining boundary provides for more efficient program implementation without adversely affecting component integrity.</p>	<p>N/A</p> <p>Acceptable with licensee's commitments for general visual examination requirements and acceptance criteria as stated in its September 7, 2001, submittal.</p> <p>This is an editorial change. Acceptable.</p> <p>This is an editorial change. Acceptable.</p>

IWE Paragraph (1992 Ed.)	Changes between IWE 1992 Edition/Addenda. and the 1998 Edition	Licensee's statement of significance and/or basis for use as an alternative examination	Comments
Table 2500-1 Cat. E-B	Deleted examination category which addressed pressure retaining welds.	Pressure retaining welds are now included in examination category E-A as addressed above.	10 CFR 50.55a makes containment weld inspections optional. Acceptable.
Table 2500-1 Cat. E-C	<p>E4.11 Replaced examination method VT-1 with detailed visual.</p> <p>E4.12 Added grid line intersections to description of parts examined. Changed examination method from volumetric to ultrasonic thickness.</p> <p>All item no.'s - Added examination requirement paragraph number references. Updated references in Acceptance Standard and Extent and Frequency columns.</p>	<p>The conditions of distress or deterioration which would be detected by a VT-1 are the same conditions that will be detected by the described detailed visual examination, as discussed in IWE-2300 above.</p> <p>The added wording clarifies inspection requirements and ensures repeatability in the location of subsequent thickness measurement points.</p> <p>Previously no references existed for examination requirements. These requirements have been added to IWE-2300 and 2500 as discussed above. Adding new references and updating paragraph numbers ensure proper requirements are applied to examinations.</p>	<p>Acceptable with licensee's commitments for detailed visual examination requirements and acceptance criteria as stated in its September 7, 2001, submittal.</p> <p>The recommended ultrasonic gridline sample requirements provide a more practical approach to augmented container examinations. Acceptable.</p> <p>Acceptable.</p>

IWE Paragraph (1992 Ed.)	Changes between IWE 1992 Edition/Addenda. and the 1998 Edition	Licensee's statement of significance and/or basis for use as an alternative examination	Comments
	Notes - Changed note 2 from requiring augmented examination until an area remains unchanged for three consecutive inspection periods to the next inspection period. Deleted note 3 which discussed inspection deferrals.	Three inspection periods cover a ten year interval. Performing augmented examinations for at least two periods while continuing general visual examinations each period provides for more efficient program implementation without adversely affecting component integrity. Deletion of note 3 is nonsignificant.	Change from three consecutive periods to one period is consistent with the requirements for Class 2 components. Acceptable.
Table 2550-1 Cat. E-D	Deleted examination category which addressed seals, gaskets and moisture barriers.	Moisture barriers have been included in examination category E-A as addressed above. Seals and gaskets previously required examination once per an interval with effectively an acceptance criteria of leak tightness. Leak tight integrity is verified during each 10 CFR 50 Appendix J leak test. Removing these inspection items provides for more efficient program implementation without adversely affecting component integrity.	Appendix J, Type A test is considered sufficient for determining the leak-tight integrity of seals and gaskets. Acceptable.
Table 2550-1 Cat. E-F	Deleted examination category which addressed dissimilar metal welds.	Dissimilar metal welds are now included in examination category E-A as addressed above.	10 CFR 50.55a makes containment weld inspections optional. Acceptable.

IWE Paragraph (1992 Ed.)	Changes between IWE 1992 Edition/Addenda. and the 1998 Edition	Licensee's statement of significance and/or basis for use as an alternative examination	Comments
Table 2550-1 Cat. E-G	Deleted examination category which addressed pressure retaining bolting.	Pressure retaining bolting is now included in examination category E-A as addressed above.	1992 Edition required VT-1 of bolting when a connection is disassembled. Licensee has committed to this. Licensee's alternative is consistent with staff's guidelines. Acceptable.
Table 2550-1 Cat. E-P	Deleted examination category which addressed 10CFR50 Appendix J testing for all pressure retaining components.	Appendix J testing is mandated by plant technical specifications. Removing this duplicate requirement from IWE does not adversely affect component integrity.	Deleting Examination Cat. E-P, provides relief to licensee without affecting component integrity. Appendix J test is already required per Technical Specification. Acceptable.
-----	Added new Table IWE-2500-2 - Ultrasonic Thickness Measurements For Augmented Examinations - which details gridline spacing and thickness measurement requirements.	The new requirements provide for consistency and repeatability in obtaining thickness measurements and thus assure the reliable detection of conditions adverse to containment integrity.	The new requirements provide consistency and repeatability in obtaining thickness measurements and thus assure the reliable detection of conditions adverse to containment integrity. Acceptable.
Table IWE-3410-1	Deleted table.	Nonsignificant - the contents of the previous table are adequately addressed in IWE-3500.	This is an editorial change. Acceptable.