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10 CFR 50.55a(g)(5)(iii)

April 12, 2002

PSLTR: #02-0014

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-0001

Dresden Nuclear Power Station, Units 2 and 3  
Facility Operating License Nos. DPR-19 and DPR-25  
NRC Docket Nos. 50-237 and 50-249

Subject: Relief Request CR-24, Inservice Inspection Program Relief regarding  
Examination Coverage for Third Inservice Inspection Program Interval

Reference: Letter from U. S. NRC to O. D. Kingsley (Commonwealth Edison Company),  
"Quad Cities, Units 1 and 2 - Relief Request CR-32 for Third 10-Year Inservice  
Inspection Interval," dated September 6, 2000

In accordance with 10 CFR 50.55a, "Codes and Standards," paragraph (g)(5)(iii), Dresden Nuclear Power Station (DNPS) is requesting relief from American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," on the basis that compliance with the specified requirements is impractical due to plant design. DNPS is submitting this relief request for those ASME Section XI weld examinations performed during the third Inservice Inspection Interval where the inspection coverage achieved was less than or equal to 90%. Specifically, this includes examinations completed during the first and second periods of the third Inservice Inspection Interval for both Units 2 and 3.

The proposed relief request is for the first and second periods of the third Inservice Inspection Interval for both Units 2 and 3. For Unit 2, the third Inservice Inspection Interval began on March 1, 1992, and the projected end date is January 19, 2003. For Unit 3, the third Inservice Inspection Interval began on March 1, 1992, and the projected end date is October 31, 2002.

This relief request is similar to a request granted for the Quad Cities Nuclear Power Station in the referenced letter.

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April 12, 2002  
U.S. Nuclear Regulatory Commission  
Page 2

Should you have any questions concerning his letter, please contact  
Mr. B. Rybak at (815) 416-2800.

Respectfully,

A handwritten signature in cursive script that reads "Preston Swafford".

Preston Swafford  
Site Vice President  
Dresden Nuclear Power Station

cc: Regional Administrator – NRC Region III  
NRC Senior Resident Inspector – Dresden Nuclear Power Station

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**ISI Program Plan**  
**Dresden Nuclear Power Station Units 2 & 3, Third Interval**

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**RELIEF REQUEST NUMBER: CR-24**  
 (Page 1 of 10)

**COMPONENT IDENTIFICATION**

Code Classes: 1  
 2  
 References: Subarticle IWB-2500  
 Subarticle IWC-2500  
 Examination Categories: B-A, B-D, & B-J  
 C-B, C-C & C-F-2  
 Item Numbers: B1.22, B1.40, B3.90, B3.100, B9.11 & B9.31  
 C2.21, C3.20, C3.30, & C5.51  
 Description: Volumetric and Surface Examination Coverage  
 Component Numbers: Various, see Table CR-24.1 and TABLE CR-24.2

**CODE REQUIREMENT**

Subarticle IWB-2500 states in part "Components shall be examined and tested as specified in Table IWB-2500-1." Table IWB-2500-1 requires a volumetric examination or a surface and volumetric examination be performed on the component based on Category and Item Number. The applicable examination area or volume and method required is as shown below from Table IWB-2500-1:

<b>Examination Category</b>	<b>Item Number</b>	<b>Examination Requirements /Figure Number</b>	<b>Examination Method</b>
B-A	B1.22	IWB-2500-3	Volumetric
B-A	B1.40	IWB-2500-5	Surface and Volumetric
B-D	B3.90	IWB-2500-7(a) IWB-2500-7(b)	Volumetric
B-D	B3.100	IWB-2500-7(a) IWB-2500-7(b)	Volumetric
B-J	B9.11	IWB-2500-8(c)	Surface and Volumetric
B-J	B9.31	IWB-2500-10	Surface and Volumetric

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**ISI Program Plan**  
**Dresden Nuclear Power Station Units 2 & 3, Third Interval**

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**RELIEF REQUEST NUMBER: CR-24**  
(Page 2 of 10)

Subarticle IWC-2500 states in part "Components shall be examined and pressure tested as specified in Table IWC-2500-1." Table IWC-2500-1 requires a surface examination or a surface and volumetric examination be performed on the component based on Category and Item Number. The applicable examination area or volume and method required is as shown below from Table IWC-2500-1:

<b>Examination Category</b>	<b>Item Number</b>	<b>Examination Requirements /Figure Number</b>	<b>Examination Method</b>
C-B	C2.21	IWC-2500-4(b)	Surface & Volumetric
C-C	C3.20	IWC-2500-5(a) IWC-2500-5(b)	Surface
C-C	C3.30	IWC-2500-5(a)	Surface
C-F-2	C5.51	IWC-2500-7(a)	Surface & Volumetric

**CODE REQUIREMENT FROM WHICH RELIEF IS REQUESTED**

Relief is requested from performing a complete coverage examination of the entire volume or area required. Entire volume or area required is defined by ASME Section XI Code Case N-460, "Alternative Examination Coverage for Class 1 and Class 2 Welds, Section XI, Division 1." Code Case N-460 states in part, "...when the entire examination volume or area cannot be examined...a reduction in examination coverage...may be accepted provided the reduction in coverage for that weld is less than 10%." DNPS invokes Code Case N-460 for use during the third Inservice Inspection Interval.

NRC Information Notice 98-42, "Implementation of 10 CFR 50.55a(g) Inservice Inspection Requirements," termed the reduction in coverage of less than 10% to be "essentially 100 percent." Information Notice 98-42 states in part, "The NRC has adopted and further refined the definition of "essentially 100 percent" to mean "greater than 90 percent"...has been applied to all examinations of welds or other areas required by ASME Section XI."

Relief is requested from performing an examination of "essentially 100%" of the required volume or area as applicable for the identified components in Table CR-24.1 and Table CR-24.2.

**BASIS FOR RELIEF**

In accordance with 10 CFR 50.55a(g)(5)(iii), relief is requested on the basis that the required "essentially 100%" coverage examination is impractical due to physical obstructions and limitations imposed by design, geometry and materials of construction for the components of Table CR-24.1 and Table CR-24.2.

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**ISI Program Plan**  
**Dresden Nuclear Power Station Units 2 & 3, Third Interval**

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**RELIEF REQUEST NUMBER: CR-24**  
(Page 3 of 10)

**BASIS FOR RELIEF (CONT'D)**

DNPS, Units 2 and 3, obtained Construction Permits CPPR-18 and CPPR-22 on January 10, 1966 and October 14, 1966 respectively. The piping systems and associated components were designed and fabricated before the examination requirements of ASME Section XI were formalized and published. Since this plant was not specifically designed to meet the requirements of ASME Section XI, compliance is not feasible or practical within the limits of the current plant design.

Physical obstructions imposed by design, geometry and materials of construction are typical of vessel appurtenances and sacrificial shield, insulation support rings, structural and component support members, adjacent component weldments in close proximity, unique component configurations and dissimilar metal weldments.

Improved examination techniques have been progressively upgraded during this interval to augment the required Section XI examinations. We have used the Electric Power Research Institute (EPRI), the Performance Demonstration Initiative (PDI), Inservice Inspection vendors and other industry sources to encourage the development of and provide an awareness of improved examination techniques to enhance coverage and flaw detection commensurate with radiation dose reduction.

Exelon examination procedures are revised on a continuing basis to incorporate proven techniques for a higher level of safety and quality as they become available. The examinations and techniques used today exceed the examinations conducted in the past on each component.

All components received as a minimum, the required examination(s) applicable to the extent practical due to the limited or lack of access available. The examinations conducted, confirmed satisfactory results evidencing no unacceptable flaws present, even though "essentially 100%" coverage was not attained. Exelon has concluded that if any active degradation mechanisms were to exist in the subject welds, those degradations would have been identified in the examinations performed.

Based on the above, with our earlier design, the underlying objectives of the code required volumetric and surface examinations have been met. The examinations were completed to the extent practical and evidenced no unacceptable flaws present. Additionally, a VT-2 examination performed on the subject components during system pressure test per examination category B-P each refueling outage and category C-H each period provides additional assurance that the structural integrity of the subject components is maintained.

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**ISI Program Plan**  
**Dresden Nuclear Power Station Units 2 & 3, Third Interval**

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**RELIEF REQUEST NUMBER: CR-24**  
(Page 4 of 10)

**PROPOSED ALTERNATE EXAMINATIONS**

DNPS will continue to perform best effort examinations in order to achieve the maximum amount of coverage. Additionally, a VT-2 examination performed on the subject components during system pressure test per examination category B-P each refueling outage and category C-H each inspection period is performed.

**APPLICABLE TIME PERIOD**

Relief is requested for the third ten-year interval of the Inservice Inspection Program for DNPS Units 2 and 3.

**ISI Program Plan**  
**Dresden Nuclear Power Station Units 2 & 3, Third Interval**

**RELIEF REQUEST NUMBER: CR-24**  
 (Page 5 of 10)

**TABLE CR-24.1**

**UNIT 2 COMPONENTS WITH LESS THAN "ESSENTIALLY 100%" COVERAGE**

<b>Section XI Category &amp; Item No.</b>	<b>Component System &amp; Line</b>	<b>Component Number</b>	<b>Component Description</b>	<b>Condition Limiting Coverage</b>	<b>Examination &amp; Coverage Percent</b>
B-A B1.22	RPV UPPER HEAD	2-THD-M1	MERIDIONAL WELD	REACTOR HEAD LIFTING LUG.	UT 86.01
B-A B1.40	RPV UPPER HEAD	2-THD-FLGA	HEAD TO FLANGE WELD	REACTOR HEAD TO FLANGE CONFIGURATION.	UT 71.47
B-A B1.40	RPV UPPER HEAD	2-THD-FLGB	HEAD TO FLANGE WELD	REACTOR HEAD TO FLANGE CONFIGURATION.	UT 71.47
B-A B1.40	RPV UPPER HEAD	2-THD-FLGC	HEAD TO FLANGE WELD	REACTOR HEAD TO FLANGE CONFIGURATION.	UT 71.47
B-A B1.40	RPV UPPER HEAD	2-THD-FLGD	HEAD TO FLANGE WELD	REACTOR HEAD TO FLANGE CONFIGURATION.	UT 71.47
B-A B1.40	RPV UPPER HEAD	2-THD-FLGE	HEAD TO FLANGE WELD	REACTOR HEAD TO FLANGE CONFIGURATION.	UT 71.47
B-A B1.40	RPV UPPER HEAD	2-THD-FLGF	HEAD TO FLANGE WELD	REACTOR HEAD TO FLANGE CONFIGURATION.	UT 71.47
B-D B3.90	RPV NOZZLE	N19A-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 33
B-D B3.90	RPV NOZZLE	N19B-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.51
B-D B3.90	RPV NOZZLE	N1A-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.07
B-D B3.90	RPV NOZZLE	N20A-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 73.52
B-D B3.90	RPV NOZZLE	N2A-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.85
B-D B3.90	RPV NOZZLE	N2B-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.85
B-D B3.90	RPV NOZZLE	N2C-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.85

**ISI Program Plan**  
**Dresden Nuclear Power Station Units 2 & 3, Third Interval**

**RELIEF REQUEST NUMBER: CR-24**  
 (Page 6 of 10)

**TABLE CR-24.1**

**UNIT 2 COMPONENTS WITH LESS THAN "ESSENTIALLY 100%" COVERAGE**

Section XI Category & Item No.	Component System & Line	Component Number	Component Description	Condition Limiting Coverage	Examination & Coverage Percent
B-D B3.90	RPV NOZZLE	N2D-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.85
B-D B3.90	RPV NOZZLE	N2E-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.85
B-D B3.90	RPV NOZZLE	N2F-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.85
B-D B3.90	RPV NOZZLE	N4A-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 25.5
B-D B3.90	RPV NOZZLE	N4B-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 25.5
B-D B3.90	RPV NOZZLE	N4C-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 25.5
B-D B3.90	RPV NOZZLE	N4D-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 25.5
B-D B3.90	RPV NOZZLE	N5B-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION. REACTOR VESSEL WELDED ATTACHMENT.	UT 20.06
B-D B3.90	RPV NOZZLE	N9-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 29.5
B-D B3.100	RPV NOZZLE	N5B-1	NOZZLE INNER RADIUS SECTION	REACTOR VESSEL WELDED ATTACHMENT.	UT 49.98
B-J B9.11	REACTOR RECIRCULATION 0201H-12	PD4-D22 (Long Seam)	LONG SEAM WELD ADJACENT TO OVERLAY OF ELBOW TO PIPE WELD	WELD ID BAND.	PT 88 UT 88
B-J B9.11	REACTOR RECIRCULATION 0201J-12	PD5-D21 (Long Seam)	LONG SEAM WELD ADJACENT TO OVERLAY OF PIPE TO ELBOW WELD	WELD ID BAND AND WHIP RESTRAINT.	PT 29 UT 29

**ISI Program Plan**  
**Dresden Nuclear Power Station Units 2 & 3, Third Interval**

**RELIEF REQUEST NUMBER: CR-24**  
 (Page 7 of 10)

**TABLE CR-24.1**

**UNIT 2 COMPONENTS WITH LESS THAN "ESSENTIALLY 100%" COVERAGE**

Section XI Category & Item No.	Component System & Line	Component Number	Component Description	Condition Limiting Coverage	Examination & Coverage Percent
B-J B9.11	REACTOR RECIRCULATION 0201K-12	PD6-D19 (Long Seam)	LONG SEAM WELD ADJACENT TO OVERLAY OF PIPE TO ELBOW WELD	WELD ID BAND AND WHIP RESTRAINT.	PT 29 UT 29
B-J B9.11	REACTOR RECIRCULATION 0201D-12	PD8-D10 (Long Seam)	LONG SEAM WELD ADJACENT TO OVERLAY OF PIPE TO ELBOW WELD	WHIP RESTRAINT.	PT 33 UT 25
B-J B9.11	REACTOR RECIRCULATION 0201E-12	PD9-D8 (Long Seam)	LONG SEAM WELD ADJACENT TO OVERLAY OF PIPE TO ELBOW WELD	WELD ID BAND AND WHIP RESTRAINT.	PT 21 UT 15
C-C C3.20	HPCI 2304-14	M-1151D-155	INTEGRALLY WELDED ATTACHMENT	PIPE CLAMP INTERFERENCE WITH SHEAR LUG ATTACHMENT.	MT 88.39
C-C C3.20	HPCI 2305-10	M-1151D-132	INTEGRALLY WELDED ATTACHMENT	PIPE CLAMP INTERFERENCE WITH SHEAR LUG ATTACHMENT.	MT 77.78
C-C C3.20	LPCI 1509-16	M-3214-17	INTEGRALLY WELDED ATTACHMENT	PIPE CLAMP INTERFERENCE WITH SHEAR LUG ATTACHMENT.	MT 75
C-C C3.20	LPCI 1519-18	M-3209-13	INTEGRALLY WELDED ATTACHMENT	PIPE CLAMP INTERFERENCE WITH SHEAR LUG ATTACHMENT.	MT 72.73
C-C C3.20	LPCI 1517-14	M-3208-07	INTEGRALLY WELDED ATTACHMENT	PIPE CLAMP INTERFERENCE WITH SHEAR LUG ATTACHMENT.	MT 80

**ISI Program Plan**  
**Dresden Nuclear Power Station Units 2 & 3, Third Interval**

**RELIEF REQUEST NUMBER: CR-24**  
 (Page 8 of 10)

**TABLE CR-24.1**

**UNIT 3 COMPONENTS WITH LESS THAN "ESSENTIALLY 100%" COVERAGE**

<b>Section XI Category &amp; Item No.</b>	<b>Component System &amp; Line</b>	<b>Component Number</b>	<b>Component Description</b>	<b>Condition Limiting Coverage</b>	<b>Examination &amp; Coverage Percent</b>
B-A B1.40	RPV UPPER HEAD	3-THD-FLGA	HEAD TO FLANGE WELD	REACTOR HEAD TO FLANGE CONFIGURATION.	UT 71.47
B-A B1.40	RPV UPPER HEAD	3-THD-FLGB	HEAD TO FLANGE WELD	REACTOR HEAD TO FLANGE CONFIGURATION.	UT 71.47
B-A B1.40	RPV UPPER HEAD	3-THD-FLGC	HEAD TO FLANGE WELD	REACTOR HEAD TO FLANGE CONFIGURATION.	UT 71.47
B-A B1.40	RPV UPPER HEAD	3-THD-FLGD	HEAD TO FLANGE WELD	REACTOR HEAD TO FLANGE CONFIGURATION.	UT 71.47
B-A B1.40	RPV UPPER HEAD	3-THD-FLGE	HEAD TO FLANGE WELD	REACTOR HEAD TO FLANGE CONFIGURATION.	UT 71.47
B-A B1.40	RPV UPPER HEAD	3-THD-FLGF	HEAD TO FLANGE WELD	REACTOR HEAD TO FLANGE CONFIGURATION.	UT 71.47
B-D B3.90	RPV NOZZLE	N12-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 75.31
B-D B3.90	RPV NOZZLE	N19A-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.51
B-D B3.90	RPV NOZZLE	N19B-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.51
B-D B3.90	RPV NOZZLE	N1A-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.07
B-D B3.90	RPV NOZZLE	N1B-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.7
B-D B3.90	RPV NOZZLE	N2B-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.85
B-D B3.90	RPV NOZZLE	N2D-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.85
B-D B3.90	RPV NOZZLE	N2E-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.85

**ISI Program Plan**  
**Dresden Nuclear Power Station Units 2 & 3, Third Interval**

**RELIEF REQUEST NUMBER: CR-24**  
 (Page 9 of 10)

**TABLE CR-24.1**

**UNIT 3 COMPONENTS WITH LESS THAN "ESSENTIALLY 100%" COVERAGE**

Section XI Category & Item No.	Component System & Line	Component Number	Component Description	Condition Limiting Coverage	Examination & Coverage Percent
B-D B3.90	RPV NOZZLE	N2G-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.85
B-D B3.90	RPV NOZZLE	N3C-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 72
B-D B3.90	RPV NOZZLE	N3D-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 72
B-D B3.90	RPV NOZZLE	N4A-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.49
B-D B3.90	RPV NOZZLE	N4B-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.49
B-D B3.90	RPV NOZZLE	N4C-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.49
B-D B3.90	RPV NOZZLE	N4D-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.49
B-D B3.90	RPV NOZZLE	N5A-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.06
B-D B3.90	RPV NOZZLE	N5B-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.06
B-D B3.90	RPV NOZZLE	N18A-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.4
B-D B3.90	RPV NOZZLE	N18B-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 20.4
B-D B3.90	RPV NOZZLE	N8-2	NOZZLE TO VESSEL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 47.24
B-J B9.11	REACTOR RECIRCULATION 0202B-28	RRB-59F	ELBOW TO ELBOW WELD	PIPE TO ELBOW WELD CONFIGURATION.	UT 75.9
B-J B9.31	MAIN STEAM 3001A-20	8X-15	BRANCH PIPE CONNECTION WELD	BRANCH PIPE CONFIGURATION.	UT 50.5
B-J B9.31	MAIN STEAM 3001C-20	8X-10	BRANCH PIPE CONNECTION WELD	BRANCH PIPE CONFIGURATION.	UT 51.4

**ISI Program Plan**  
**Dresden Nuclear Power Station Units 2 & 3, Third Interval**

**RELIEF REQUEST NUMBER: CR-24**  
 (Page 10 of 10)

**TABLE CR-24.1**

**UNIT 3 COMPONENTS WITH LESS THAN "ESSENTIALLY 100%" COVERAGE**

Section XI Category & Item No.	Component System & Line	Component Number	Component Description	Condition Limiting Coverage	Examination & Coverage Percent
C-B C2.21	ISO CONDENSOR 1302A-12	12-8	NOZZLE TO SHELL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 44.56
C-B C2.21	ISO CONDENSOR 1302B-12	12-9	NOZZLE TO SHELL WELD	NOZZLE, RADIUS BLEND AND WELD CONFIGURATION.	UT 44.56
C-C C3.20	CRD 0409A-20	M-1188D-1120	INTEGRALLY WELDED ATTACHMENT	BOX GUIDE INTERFERENCE WITH SHEAR LUG ATTACHMENT.	MT 85.96
C-C C3.20	CORE SPRAY 1404-12	M-3408-24	INTEGRALLY WELDED ATTACHMENT	BOX GUIDE INTERFERENCE WITH SHEAR LUG ATTACHMENT.	MT 87.30
C-C C3.20	HPCI 2304-14	M-1187D-72	INTEGRALLY WELDED ATTACHMENT	BOX GUIDE INTERFERENCE WITH SHEAR LUG ATTACHMENT.	MT 56
C-C C3.20	ISO CONDENSOR 1303-12	M-1199D-258	INTEGRALLY WELDED ATTACHMENT	PIPE CLAMP INTERFERENCE WITH SHEAR LUG ATTACHMENT.	PT 82.69
C-C C3.30	CORE SPRAY PMP 3A-1401	M-1186D-1016	INTEGRALLY WELDED ATTACHMENT	PUMP TO SKIRT IWA CONFIGURATION.	MT 61.94
C-C C3.30	LPCI PMP 3A-1502	M-1200D-1017	INTEGRALLY WELDED ATTACHMENT	PUMP TO SKIRT IWA CONFIGURATION.	MT 61.94
C-F-2 C5.51	CRD 0408A-6	6-401	ELBOW TO PIPE WELD	ADJACENT PLANT STRUCTURE.	MT 80.95 UT 78.31
C-F-2 C5.51	CRD 0408A-6	6-74	TEE TO PIPE WELD	ADJACENT PLANT STRUCTURE.	MT 71.96
C-F-2 C5.51	LPCI 1517-14	14-1(A)	PIPE TO VALVE WELD	PIPE TO VALVE WELD CONFIGURATION.	UT 86.35