

**Mail Envelope Properties** (3C960269.527 : 21 : 21114)

**Subject:** Please call me.  
**Creation Date:** 3/18/02 10:06AM  
**From:** David Jaffe

**Created By:** DHJ@nrc.gov

<b>Recipients</b>	<b>Action</b>	<b>Date &amp; Time</b>
txu.com	Transferred	03/18/02 10:06AM
obaidb (obaidb@txu.com)		

<b>Post Office</b>	<b>Delivered</b>	<b>Route</b>
		txu.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
Mail MESSAGE	534	03/18/02 10:06AM

**Options**

**Auto Delete:** No  
**Expiration Date:** None  
**Notify Recipients:** Yes  
**Priority:** Standard  
**Reply Requested:** No  
**Return Notification:** None

**Concealed Subject:** No  
**Security:** Standard

**To Be Delivered:** Immediate  
**Status Tracking:** Delivered & Opened

**From:** David Jaffe  
**To:** obaidb@txu.com  
**Date:** 3/18/02 10:06AM  
**Subject:** Please call me.

**From:** Andrea Keim  
**To:** David Jaffe  
**Date:** 3/18/02 10:00AM  
**Subject:** MB3039

RR A-5

References an unacceptable code case. The licensee's overall request is okay. But the reference to "invoke CC N-648" and then some additional requirements and corrections creates difficulty. Please rewrite in terms of a self contained alternative without reference to invoking CC-648.

See Fermi 2 SER dated October 5, 2001.

ISI Relief Request No. A-5 Rev. 1  
Invoke Code Case N-648

Draft Regulatory Guide DG-1112, "ASME Code Cases Not Approved for Use," lists Code Case N-648.

Please re-write without listing your alternative in terms of CC N-648. In the alternative section list the essential elements that will be followed in lieu of the code requirements. Using the essential elements from the code case and the additional elements.

Referencing the code case in the alternative could create confusion. The code case provides justification for using a visual exam in lieu of a volumetric exam, but it is lacking in the implementation of the visual exam.

The alternative should include (take the elements of the code case and the addition elements and list them as the stand alone alternative, without referencing the code case in the alternative) include:

Areas to be examined  
Examination technique, resolution sensitivity  
Acceptance criteria