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May 07, 2002

Office of Administration
United States Nuclear Regulatory Commission
Washington, D.C. 20555-0001
Attn: Rules and Directives Branch

Review Comments on Draft Regulatory Guides, DG-1091, Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1

Dear Sirs:

The following comment relates to draft Regulatory Guide-1091 dated December, 2001. My comment concerns the conditional acceptance of Code Case N-606-1. In your draft Regulatory Guide, it is stated that the case is acceptable subject to the condition that a VT-1 examination be performed prior to welding to ensure that the surface is free from contaminants (e.g., oil, grease, dirt) and that the surface is properly contoured so that an acceptable weld can be produced. While these inspections are always done for repair excavations, it seems excessive and unnecessary to have such inspections performed by VT-1 examination personnel. Elsewhere in nuclear construction, there is a distinction between inspection and examination. I suggest that the verification that is addressed in your draft Regulatory Guide is really an inspection, not an examination, and that the use of VT qualified examination personnel is not warranted.

If you have any questions or require any further information, please contact me at (415) 768-1685, or the following address.

Sincerely,
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