

**From:** "Robert L Gill Jr" <rlgill@duke-energy.com>  
**To:** "Rani Franovich" <RLF2@nrc.gov>  
**Date:** 6/7/02 8:34AM  
**Subject:** Re: Fwd: Regarding the intent of the response to RAI B.27-2

Rani,

The pressurizer spray head is a non-safety component and pressure boundary and structural integrity are not intended functions. Spray is the only intended function. There is no need to determine critical crack sizes. The VT-3 examination is acceptable for managing the spray function of the spray head and the acceptance criteria for such examinations are contained in the ASME Code. Critical crack size is not an issue with VT-3 exams. This is exactly the same inspection that we proposed and was approved by NRC on Oconee.

Bob

"Rani  
Franovich" To: <rlgill@duke-energy.com>  
<RLF2@nrc.gov cc: "Barry Elliot" <BJE@nrc.gov>, "James  
> Davis" <JAD@nrc.gov>  
bcc:  
06/06/2002 Subject: Re: Fwd: Regarding the intent of the  
02:29 PM response to RAI B.27-2

Bob,

Can you say the same thing about the VT-3 examination you propose for the Pressurizer Spray Head Examination (RAI response to 2.3.2.7-1) so that the staff has assurance that the visual inspection will be able to detect flaws smaller than the critical crack size estimated by analysis for the spray head?

Rani

>>> "Robert L Gill Jr" <rlgill@duke-energy.com> 06/06/02 09:25AM >>>

Rani,

I have discussed with Mary. We agree that the recast sentence provided by Jim more accurately conveys our intent. The affected sentence provided in our RAI response was poorly worded and confusing. We agree to make it confirmatory. Bob

"Rani

Franovich" To: <rlgill@duke-energy.com>

<RLF2@nrc.gov cc:  
> bcc:  
Subject: Fwd: Regarding the  
intent of the  
06/06/2002 response to RAI B.27-2  
07:52 AM

----- Message from "James Medoff" <JXM@nrc.gov> on Wed, 05 Jun 2002  
15:47:49 -0400 -----

To: "Rani Franovich" <RLF2@nrc.gov>

Subject: Regarding the intent of the  
response to RAI B.27-2

Ask Bob whether the intent of the last sentence in the second paragraph of  
the response to RAI  
B.27-2 is that "The visual inspection method selected for the inspection of  
RV internal plates, forging, and welds will be sufficient to detect cracks  
in the components prior to any growth to a size that is greater than the  
critical crack size (critical crack length) for the material.

Tell him critical crack length is a material property that is calculated or  
determined by engineering analysis, not a flaw that exists in a material.  
Inspections can detect flaws prior to reaching a size equivalent to the  
critical crack size, but not the critical crack size itself.

If the answer to the intent question is yes then we'll make it a  
confirmatory item.

Jim

**CC:** "Gregory D Robison" <gdrobiso@duke-energy.com>, "Mary H Hazeltine" <mhhazelt@duke-energy.com>