

Technical questions to discuss with the NRC regarding Bulletin 2002-02.

In the Table: Example Supplemental Inspections

- 1) **“100% Eddy Current Testing or Dye Penetrant Testing of all J-Groove Weld and CRDM Penetration Material Wetted Surfaces (Note 4)”**

Comment: “and CRDM Penetration Material Wetted Surface” needs clarification: Is it the intent to inspect by ECT the J-groove weld and adjacent nozzle material instead of the entire wetted surface to include the RVHP ID to the top of the head? Suggest the phrase should be “and adjacent CRDM Penetration Material Wetted Surface”.

- 2) **“100% Ultrasonic Testing of CRDM Nozzle Base Material (Note 3)
Note 3: Testing should include as a minimum, the portion of the nozzle from inside the RPV head to the bottom of the nozzle.”**

Comment: Note 3 needs clarification: Is the scope of this supplemental inspection to inspect the CRDM ID on either side of the J-groove weld plus ½ inch on each side to encompass the heat affected zone (HAZ) similar to piping welds? For penetrations with thermal sleeves, the available gap scanning UT/ECT probes and delivery systems can only inspect a limited portion of the penetration above the weld. In addition, there are centering rings, tabs, or expansion tabs that may further preclude inspection above the weld.

- 3) **General Comment on Scope of UT/ECT Inspections identified in the Table:
Example Supplemental Inspections**

Comment: There may be physical limitations that would require plant modifications to complete 100% of all examinations. In several plants there are reactor vessel level instrumentation systems (RVLIS) installed in unused CRDM penetrations. The installation of these RVLIS probes may preclude inspection of these penetrations without performing physical modifications to the head. The thermal sleeves in some locations may also preclude complete examination of the weld root area of the penetration. Can the under head ECT or dye penetrant test in combination with the bare metal visual exam be used as an alternative, subject to a plant by plant acceptance from the NRC, or should plants be preparing to modify their RV head?

- 4) **General Comment on Scope of UT/ECT Inspections identified in the Table:
Example Supplemental Inspections**

Comment: Is it the intent that plants with closely conforming insulation that choose to perform non-visual inspections of the penetration and the J-groove weld, also destroy the insulation in order to perform a bare metal visual?