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September 23, 2002
IPN-02-076

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop O-P1-17
Washington, DC 20555-0001

SUBJECT: Indian Point Nuclear Generating Unit No. 3
Docket No. 50-286
**Response to Request for Additional Information Regarding
Relief Requests for the Third 10-Year Inservice Inspection Program Plan**

- Reference:
1. NRC Letter, "Request for Additional Information Regarding Relief Requests for the Third 10-Year Inservice Inspection Program, Indian Point Nuclear Generating Unit No. 3 (TAC No. MB4766)", dated August 16, 2002
 2. Entergy letter to USNRC, IPN-02-024, "Revised Relief Requests Nos. 3-12, 3-14, 3-16, 3-17, Third 10-Year Inservice Inspection Interval Program Plan", dated April 3, 2002

Dear Sir:

This letter provides Entergy's response (Attachment 1) to the additional information requested by the NRC in Reference 1 regarding four relief requests (RRs) submitted by Entergy Nuclear Operations, Inc. (ENO) in Reference 2. ENO has revised relief requests RR 3-14 and RR 3-16 to reflect the change on the basis for relief based on impracticality pursuant to 10 CFR 50.55a(g)(5)(iii). The revised RR's, provided in Attachment 2, also contain additional information as requested by Reference 1.

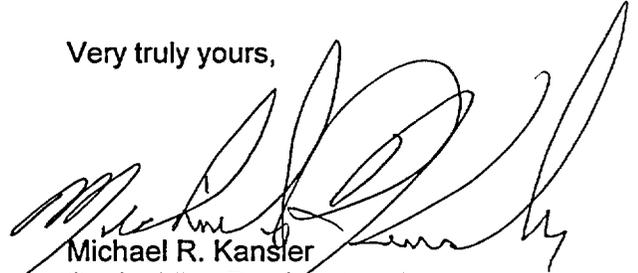
ENO is withdrawing RR 3-12 and RR 3-17. RR 3-12 involved ultrasonic examination of the reactor vessel head thickness greater than the currently qualified thickness of 7.64 inches. Entergy is currently evaluating other alternatives with EPRI to complete the required inspection prior to the end of the Third ISI Interval (July, 2009). RR 3-17 involved the use of a weld overlay repair method for moderate energy service water piping. This RR is being withdrawn because there is no specific pipe location identified at this time where the repair method is needed.

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Approval for RRs 3-14 and 3-16 is requested by December 16, 2002 to support implementation for the upcoming R12 refueling outage.

There are no new commitments made in this letter. If you have any questions, please contact Ms. Charlene Faison at 914-272-3378.

Very truly yours,



Michael R. Kansler
Senior Vice President and
Chief Operating Officer

Attachments: As stated

cc:

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ATTACHMENT 1 TO IPN-02-076

**Response to Request for Additional Information Regarding
Relief Requests for Third 10-Year Inservice Inspection Interval Program
Indian Point Nuclear Generating Unit No. 3 (IP3)**

ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNIT NO. 3
DOCKET NO. 50-286
DPR-64

Response to Request for Additional Information

Regarding Relief Requests

Third 10-Year Inservice Inspection Interval Program

Indian Point Nuclear Generating Unit No. 3 (IP3)

In a letter dated April 3, 2002, Entergy Nuclear Operations, Inc. (the licensee) submitted Relief Requests Nos. 3-12, 3-14, 3-16, and 3-17 from the inservice inspection requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, for IP3. The U. S. Nuclear Regulatory Commission (NRC) staff has the following questions regarding the information provided in the proposed relief requests:

1. **Request for Relief 3-12, Rev. 1, Examination Category B-A, Pressure Retaining Welds in Reactor Vessel**

Licensees are required to qualify, through performance demonstration, ultrasonic examination procedures, personnel, and equipment in accordance with the 1995 Edition through 1996 Addenda of ASME Section XI, Appendix VIII. Provisions of 10 CFR 50.55a(b)(2)(xv) may be used to modify implementation of Appendix VIII. The licensee requested to use the industry Performance Demonstration Initiative (PDI) procedure PDI-UT-6 for reactor vessel head welds for thicknesses greater than the currently qualified procedure thickness. The licensee stated that this procedure has only been qualified for thicknesses up to 7.64 inches.

The supplements contained in Appendix VIII were developed with essential variables required to ensure the reliability of examinations. One of the essential variables is the weld or component thickness for which that supplement may be applied. Supplement 6, "Qualification Requirements for Reactor Vessel Welds Other Than Clad/Base Metal Interface", requires that at least one performance demonstration specimen be at least 90% of the maximum thickness to be examined. Article VIII-3000 allows for changes in essential variables through subsequent performance demonstrations.

- A. Provide the revision of PDI-UT-6 planned for use during reactor vessel head weld examinations at IP3.
- B. Provide a technical justification for extending the thickness of the performance demonstration qualification. As a minimum, this should include the results of simulation or modeling that justify extending the range of the procedure, and show that the search units used will provide adequate coverage and signal responses for the inspection ranges required at IP3. Include a brief description of the mock-ups, and types and locations of flaws used during the performance demonstration qualification of PDI-UT-6.
- C. Under Paragraph D of RR 3-12, the licensee stated that, "While not part of this relief, Entergy plans to perform the inspection of the Head-to-Flange Weld (B1.40, Weld #1 on INT-1-1300) using the PDI method [presumably PDI-UT-6] in

lieu of the Section XI examination as well. The PDI method will be used in accordance with Section IWA-2240 of Section XI for alternative examination methods.”

However, Appendix I, Article I-2000, Paragraph I-2110, excludes using techniques qualified under Appendix VIII for shell-to-flange or head-to-flange welds. Paragraph IWA-2240 is not intended to be used for changes in volumetric coverages, beam directions or angles, etc. associated with existing method variables set forth in ASME V, Article 4. The use of a single 60° refracted longitudinal probe does not comply with Article 4. Therefore, an alternative, pursuant to 10 CFR 50.55a(a)(3)(i), should be submitted if the licensee intends to deviate from Article 4 requirements.

Entergy Response:

Entergy is currently evaluating other alternatives with EPRI to complete the required inspection prior to the end of the Third ISI Interval (July, 2009). Therefore, Entergy is withdrawing this relief request at this time.

2. Request for Relief 3-14, Rev. 1, Examination Category B-B, Pressure Retaining Welds in Vessels Other than the Reactor Pressure Vessel

The licensee requested relief, pursuant to 10 CFR 50.55a(a)(3)(ii), from performing 100% examinations of pressurizer upper and lower head circumferential welds and adjoining longitudinal welds. 10 CFR 50.55a(a)(3)(ii) requires licensees proposing alternatives to Code requirements to demonstrate that compliance with the specified requirement (in this case pressurizer vessel weld volumetric examinations) would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety. However, the licensee presented drawings and past interval inspection reports showing limitations to accessing these welds for volumetric examination. The licensee should resubmit this request, based on the impracticality of performing the examinations due to accessibility limitations, in accordance with 10 CFR 50.55a(g)(5)(iii).

In addition, it appears that, for pressurizer bottom head Weld Number 1, greater than 90% volumetric examination is being obtained. Is the licensee using NRC-approved Code Case N-460? If so, no relief for weld number 1 is required. For Weld Number 2, confirm whether the insulation in place is permanently installed and whether the “access window” can be adjusted to allow inspection of the circumferential-to-longitudinal intersection of Welds 1 and 2. For Weld Numbers 16 and 17, confirm that no access is available for volumetric examination.

Entergy Response:

Relief Request RR 3-14 is being resubmitted (Attachment 2), for welds nos. 2, 16 and 17 based on the impracticality of performing the examinations due to accessibility limitations, in accordance with 10 CFR 50.55a(g)(5)(iii). Relief for weld no. 1 is no longer required. Additional information on access limitation as requested is included in the revised relief request.

3. Request for Relief 3-16, Rev.1, Examination Category B-D, Full Penetration Welded Nozzles in Vessels

The licensee has requested relief from performing volumetric examination of pressurizer top head nozzles (spray, safety, relief) inner radius sections. The nozzles are integrally cast into the head, so no nozzle-to-head weld exists. The licensee referenced 10 CFR 50.55a(a)(3)(i), in that the proposed alternative would provide an acceptable level of quality and safety, but made a case for impracticality, based on surface conditions and other metallurgical/geometrical considerations. The licensee should resubmit this request, pursuant to 10 CFR 50.55a(g)(5)(iii), based on the impracticality of performing the examinations due to the nozzle design.

Discuss whether the licensee considered using available new technology for examining the inner radii of these nozzles. It may now be possible to use phased array technology to steer and focus the sound energy into the Code-required volume, with minimal scanning on the surface of the component. This could potentially save man-rem exposure and allow the nozzle examinations to be spread out over the interval, as required by Code.

Entergy Response:

Relief Request RR 3-16 is being resubmitted (Attachment 2), based on the impracticality of performing the examinations due to accessibility limitations, in accordance with 10 CFR 50.55a(g)(5)(iii). Entergy has consulted with EPRI on other inspection techniques, such as the phased array. Although phased array could cover a larger inspection volume, it is also limited by the requirement of a relatively smooth inspection surface. Because of the casting, the pressurizer nozzle surface is quite uneven and therefore not suitable for either the ultrasonic examination or the phased array inspection techniques. Additional information as requested is included in the revised relief request.

4. Request for Relief 3-17, Rev. 2, Repairs of Class 3 Moderate Energy Service Water Piping

During a telephone call with licensee representatives on August 12, 2002, the licensee informed the NRC staff that it would be withdrawing this relief request.

Entergy Response:

Entergy is withdrawing RR 3-17 because there is no specific pipe location identified at this time where the proposed repair method is needed.

ATTACHMENT 2 TO IPN-02-076

INDIAN POINT NUCLEAR GENERATING UNIT NO. 3

**THIRD TEN-YEAR INSERVICE INSPECTION
INTERVAL PROGRAM PLAN
REVISED RELIEF REQUESTS**

Relief Request RR 3-14, Revision 2 (2 pages)

Relief Request RR 3-16, Revision 2 (3 pages)

**ENERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNIT NO. 3
DOCKET NO. 50-286
DPR-64**

RELIEF REQUEST NUMBER 3-14 (I), Rev. 2

A. COMPONENT IDENTIFICATION

Code Class: 1
References: Table IWB-2500-I, Category B-B, Figure IWB-2500-I and 2
Examination Category: B-B
Item Number: B2.11, B2.12
Description: Inspection of Pressurizer Shell-To-Head Circumferential and Longitudinal Welds

B. CODE REQUIREMENT

Table IWB-2500-1, Category B-B, Items B2.11 and B2.12 require volumetric examination of the Pressurizer Circumferential and the adjoining foot of the longitudinal shell-to-head welds as defined by Figures IWB-2500-1 and -2.

C. RELIEF REQUESTED

Indian Point 3 requests relief from performing the code required volumetric examination of the pressurizer upper head circumferential weld # 17 on sketch INT-1-2100 (attached) and from examining the intersecting one foot of the longitudinal shell-to-head welds (#s 2 and 16).

D. BASIS FOR RELIEF

Pursuant to 10CFR50.55a(g)(5)(iii), relief is requested on the basis that compliance with the specified Code requirement is impractical due to accessibility limitations. The pressurizer was designed and fabricated to Codes in effect during the late 1960's. The Codes used did not provide for full access for inservice inspection as required by later Codes. The upper circumferential and longitudinal welds are enclosed in a biological and missile shield (see attached drawings 9321-F-25453 and 9321-F-25463). Insulation details can be seen on attached drawing 9321-LL-53253.

While the insulation drawing indicates that the insulation in the area of circumferential weld #17 is removable, the pressurizer safety relief piping and the proximity to the missile shield makes removal of the insulation and inspection of the weld impractical. The longitudinal weld #16 is just below weld #17 and is even more restricted by the missile shield.

Longitudinal Weld #2 for the lower head had been examined in the past, but the required coverage could not be achieved due to access limitations. A similar relief was granted for the second 10-Year interval (reference SER dated November 7, 1991, TAC No. 72247). The first 15" of the section of the weld adjoining circumferential weld #1 is covered by permanent insulation. One foot of the weld above the first 15" was scanned in the last interval through an "access window" section of removable insulation, but the insulation near the weld limits the 45-degree and 60-degree scans as indicated in the attached "Limitation to Examination" sheets. The access window cannot be adjusted to increase the inspection area.

RELIEF REQUEST NUMBER 3-14 (I), Rev. 2

E. PROPOSED ALTERNATE EXAMINATION

Visual examination (VT-2) will be performed of the upper head welds (#s 16 and 17) for evidence of leakage during system pressure tests in accordance with IWB-2500, Category B-P, and Code Case N-498-1. It is expected that any through wall defects would be detected by this examination prior to the failure of the pressurizer based on the expectation that the component will experience leakage before a catastrophic failure ("leak before break"). A similar request for relief was approved in the Second 10-Year interval (Reference SER dated November 7, 1991, TAC NO. 72247).

Volumetric examination of the lower longitudinal welds (#2) will be performed, but only to the extent practical as indicated above in this relief request. In lieu of the adjoining one foot of weld #2, an accessible foot of the weld will be examined to the extent practical.

F. JUSTIFICATION FOR RELIEF

Based on the reliable operating history of this and similar vessels at other plants and the performance of VT-2 examinations for leakage, granting of this relief request will not decrease the overall level of quality and safety of this component.

G. PERIOD FOR WHICH RELIEF IS REQUESTED

Relief is requested for the third inspection interval, July 21, 2000 through July 20, 2009.

H. ATTACHMENT TO RELIEF

Sketch INT-1-2100, Rev.8

Dwg. 9321-LL-53253, Rev.2

Dwg. 9321-F-25453, Rev.20

Dwg. 9321-F-25463, Rev.12

"Limitation of Examination" Sheet for Weld # 2 for the 2nd Interval

RELIEF REQUEST NUMBER 3-16 (I), Rev. 2

A. COMPONENT IDENTIFICATION

Code Class: 1
References: Table IWB-2500- 1, Figure IWB-2500-7
Examination Category: B-D
Item Number: B3.120
Description: Inspection of Pressurizer Nozzle Inside Radius Sections

B. CODE REQUIREMENT

Table IWB-2500-1, Category B-D, requires a volumetric examination of the pressurizer nozzle inside radius section.

C. RELIEF REQUESTED

Indian Point 3 requests relief from the performing the code required volumetric examination of the pressurizer nozzle inside radius section.

D. BASIS FOR RELIEF

Pursuant to 10 CFR 50.55a(g)(5)(iii), relief is requested on the basis that the nozzle design makes it impractical to perform the examination. The pressurizer was designed and fabricated to Codes in effect during the late 1960s. The Codes used did not provide for full access for inservice inspection nor did they require a surface finish in the nozzle area suitable for UT examination. The design of the nozzles, utilizing a gradual inside radius section, is specifically intended to reduce stress in this area and minimize the conditions that might lead to cracking.

The nozzles on the pressurizer are cast with the vessel heads. The identification numbers for these nozzles are 20IR, 21IR, 22IR, 23IR, 24IR, and 25IR as shown on sketch INT-1-2100. The as-cast surface of the heads, combined with the geometry of this area, makes ultrasonic examination of the nozzle inner radii impractical (see drawing 681J281). Entergy has consulted with EPRI on other inspection techniques, such as the phased array. Although phased array could cover a larger inspection volume, it is also limited by the requirement of a relatively smooth inspection surface. Because of the casting, the pressurizer nozzle surface is quite uneven and therefore not suitable for either the UT or the phased array inspection techniques. An uneven surface will change the direction of the beam, resulting in an amplified deviation. Additionally, to perform an effective inspection, a transducer matching the curvature of the nozzle area is also required. The varying curvature of the nozzles thus prevents an effective inspection of this area as well. The geometry and size of the nozzles are such that a radiographic examination is not feasible. Specifically, the radiographic test film cannot be placed properly from the I.D. due to a lack of interior structure. Placement of the source will not allow proper film to source distance, resulting in greatly reduced sharpness. Access to the exterior nozzle inspection area is also

RELIEF REQUEST NUMBER 3-16 (I), Rev. 2

limited due to the following physical restrictions: 1) the relief valves, piping, the platform at elevation 123'-3" that is used for valve inspection and removal; 2) the plate and channel assembly at elevation 120'-11"; 3) insulation and the missile shield wall, as shown in attached drawings 9321-F-25453, 9321-F-25463 and 9321-F-53253. As a result, any surface or visual examination would be significantly restricted, especially considering the anticipated high radiation levels on the outside and the as-clad surface on the interior.

A similar relief to perform only the visual, VT-2 examination was initially requested for the 2nd ISI Interval, but was granted with an additional condition to perform a remote video examination of the pressurizer nozzle inside radius sections, with the exception of the pressurizer surge nozzle (25IR), which has a retaining basket covering the outlet, thus precluding remote visual examination (Reference SER dated December 21, 1994, TAC NO. M8269 for Relief Request No. 9). These pressurizer nozzles inside radius sections were remote visually inspected during the Second ISI Interval (Refueling Outage 10 in 1999). No evidence of cracking was found

E. PROPOSED ALTERNATE EXAMINATION

In lieu of the code-required volumetric examination, all nozzles (with the exception of Pressurizer Surge Nozzle 25IR) will be examined visually (VT-3) using a remote color video camera. This visual (VT-3) examination for all accessible nozzles will be performed at the same time during an outage when the Pressurizer manway cover is removed for maintenance activities: or by the end of the 10-Year interval for ISI inspection. In addition, all nozzles will be visually examined (VT-2) at each refueling outage during system pressure tests in accordance with IWB-2500, Category B-P, and Code Case N-498-1. It is expected that any through wall defects would be detected by the proposed alternate examinations prior to failure of the component. This is based on the expectation that the component will experience leakage before a catastrophic failure ("leak before break")

F. JUSTIFICATION FOR RELIEF

The type and frequency of examinations proposed for the nozzles are the same as those in effect for the 2nd inspection interval. Based on the reliable operating history of this and similar vessel nozzles at other plants, and the satisfactory remote visual examination results from the inspection performed in 1999, the granting of this relief to perform the remote visual VT-3 and the VT-2 examination of the pressurizer nozzles during a system pressure test will not decrease the overall level of quality and safety. The remote visual examination will be the alternate examination for the 3rd Interval.

Since access to perform the VT-3 visual examination is through the pressurizer manway, it will be performed during the interval when other maintenance activities require the pressurizer manway to be removed, or by the end of the interval. All the accessible nozzles will be examined at the same time to minimize impact on outage schedules, radwaste generation and radiation exposures. During the 2nd Interval, approximately 150 mRem was recorded for the performance of this remote visual (VT-3) examination.

RELIEF REQUEST NUMBER 3-16 (I), Rev. 2

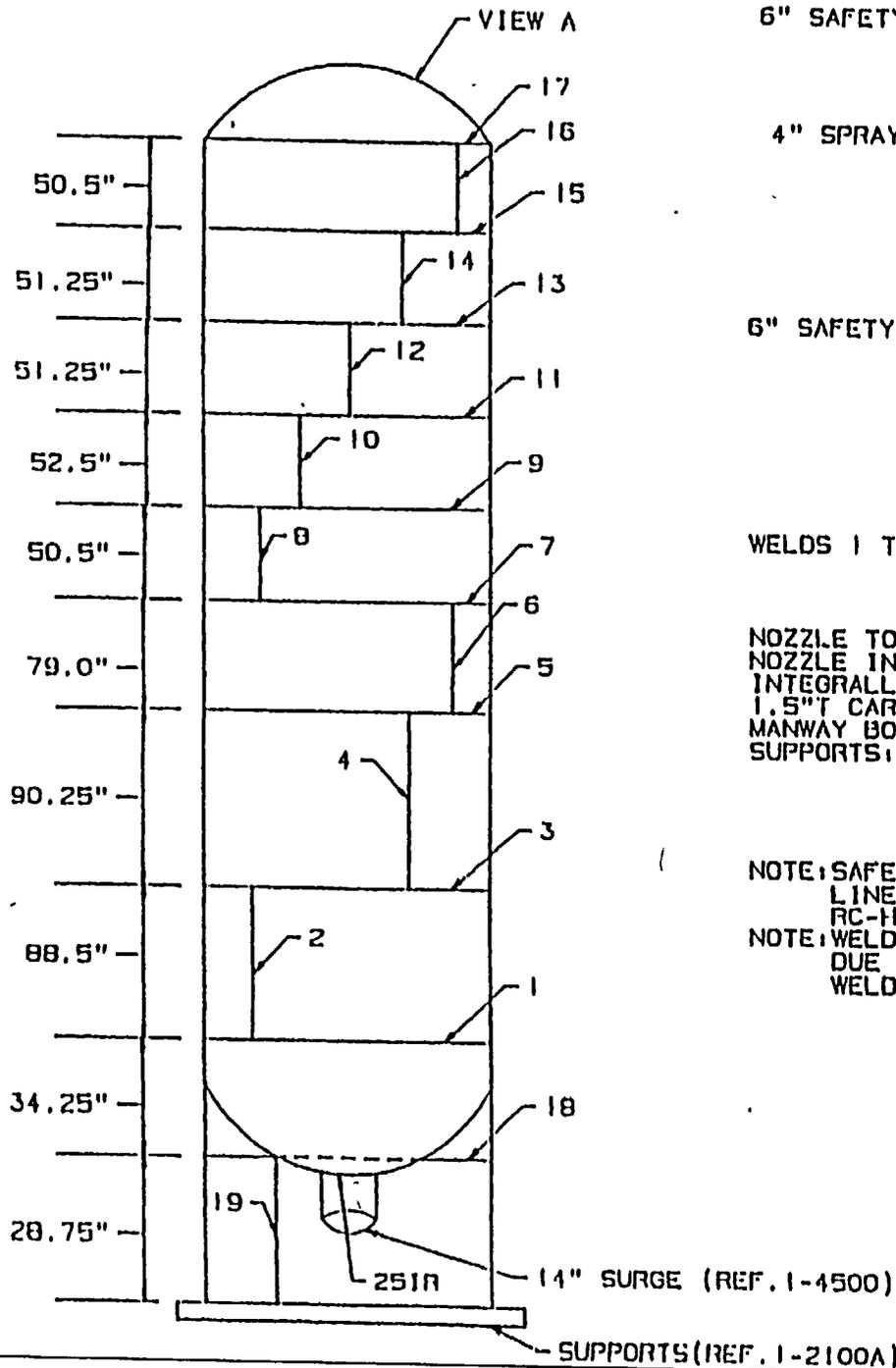
G. PERIOD FOR WHICH RELIEF IS REQUESTED

Relief is requested for the third inspection interval, July 21, 2000 through July 20, 2009.

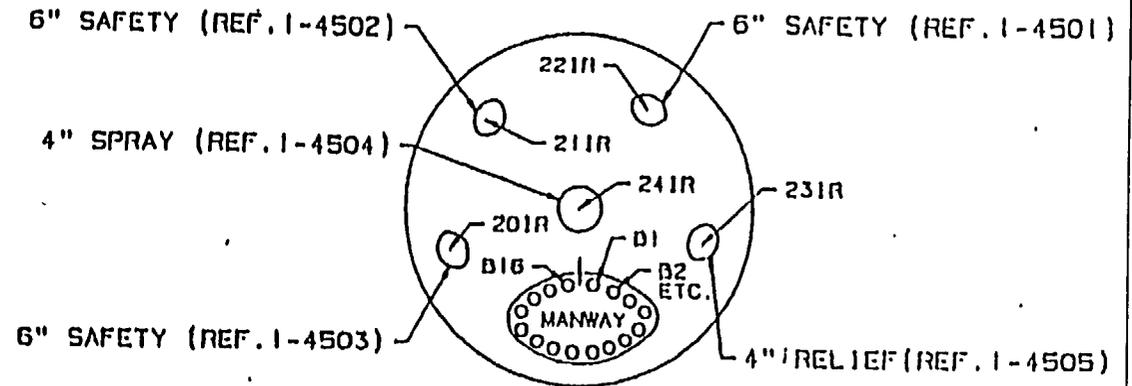
H. ATTACHMENTS

- Sketch INT-1-2100
- Drawing 681J281, Rev.4
- Drawing 9321-F-25453, Rev.20
- Drawing 9321-F-25463, Rev.12
- Drawing 9321-LL-53253, Rev. 2

PRESSURIZER



VIEW A



WELDS 1 THRU 17: SHELL: 4.75" T SA 302 GRADE B CARBON STEEL
UPPER & LOWER HEAD: 4.75" T SA 216 GRADE WCC
CARBON STEEL
DIAMETER: 92.375"; CIRCUMFERENCE: 290.05"

NOZZLE TO VESSEL WELDS: NOT APPLICABLE
NOZZLE INSIDE RADIUS SECTION: 201R THRU 251R
INTEGRALLY WELDED ATTACHMENT SUPPORT SKIRT WELD 18.
1.5" T CARBON STEEL PLATE TO SA 516 GRADE 70 CARBON STEEL
MANWAY BOLTING: 16-1.88" DIAMETER
SUPPORTS: REF. INT-1-2100A

NOTE: SAFETY NOZZLE LOCATIONS PER CON. ED. DRAWING A202108 AND
LINE NUMBER STAMPED ON INTEGRALLY WELDED ATTACHMENTS
RC-H-342, RC-H-343 AND RC-H-344.

NOTE: WELD 2-0" TO 15" (ADJACENT WELD 1) INACCESSIBLE
DUE TO PERMANENT INSULATION.
WELD 19 LOCATED 25" CCW FROM WELD 2.

ENERGY NUCLEAR NORTHEAST INDIAN POINT UNIT NO. 3	
PRESSURIZER RCPCPRI	
INT-1-2100	REV. 8

WESTINGHOUSE NUCLEAR SERVICE DIVISION
INSPECTION SERVICES

LIMITATION TO EXAMINATION

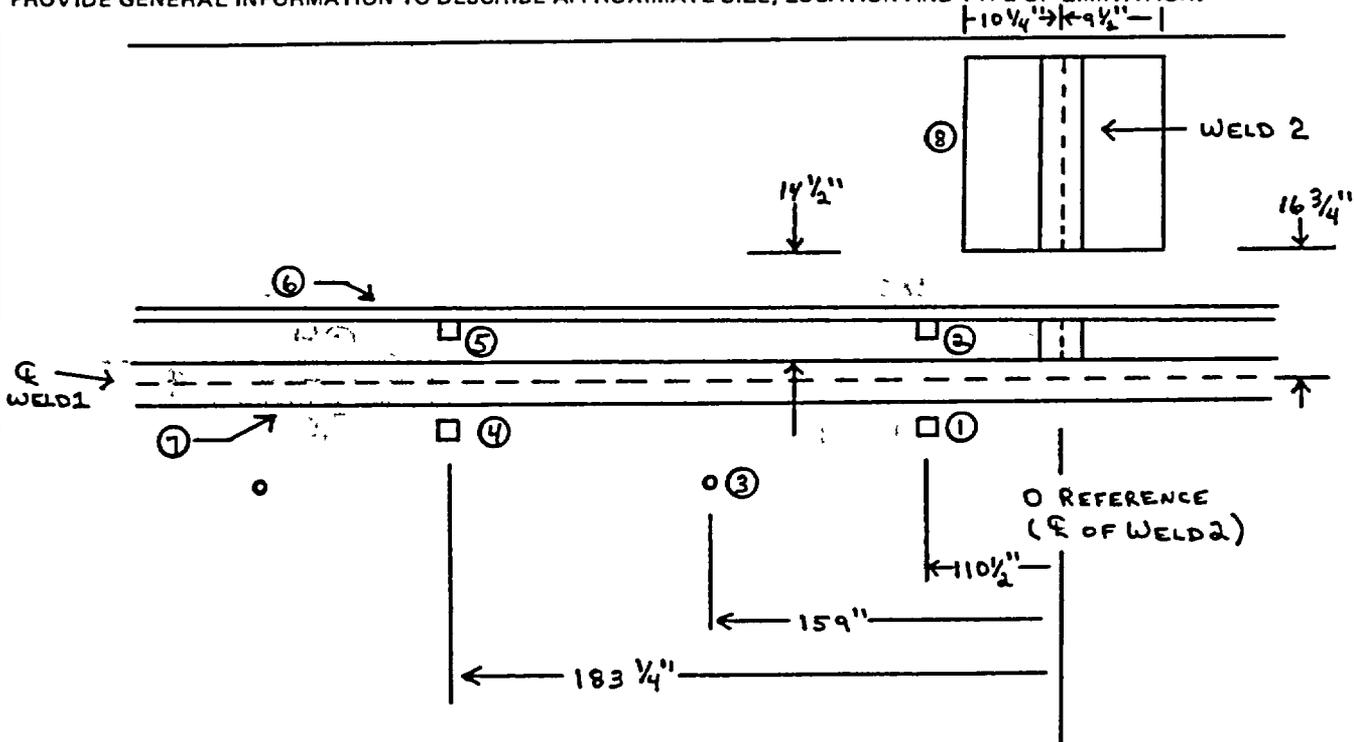
PLANT INDIAN POINT UNIT No.3 SKETCH INT-1-2100

SYST/COMP PRESSURIZER RCPCRI PROCEDURE INT-ISI-47 REV.1

EXAMINER James R. Delluso William G. Valley DATE 10-21-90
LEVEL II Robert S. Casat

RELATED TO: U/T P/T _____ M/T _____ V/T _____ ITEM(S): 1 + 2

PROVIDE GENERAL INFORMATION TO DESCRIBE APPROXIMATE SIZE, LOCATION AND TYPE OF LIMITATION.



- ① 2"x2" WELDED PAD 3" FROM WELD & LIMITS 0°, 45°+60° 2, 7+8 SCANS
- ② 2"x2" WELDED PAD 3" FROM WELD & LIMITS 0°, 45°+60° 5, 7+8 SCANS
- ③ 1" INSTRUMENTATION LINE 6 1/2" FROM WELD & LIMITS 45°+60° 2 SCAN
- ④ 2"x2" WELDED PAD 3" FROM WELD & LIMITS 0°, 45°+60° 2, 7+8 SCANS
- ⑤ 2"x2" WELDED PAD 2 3/4" FROM WELD & LIMITS 0°, 45°+60° 5, 7+8 SCANS
- ⑥ INSULATION SUPPORT RING 4 1/2" FROM WELD & LIMITS 0°, 45°+60° 5, 7+8 SCANS
- ⑦ WELD CROWN LIMITS 0°, 45°+60° 2, 5, 7+8 SCANS
- ⑧ PERMANENT INSULATION LIMITS 45°+60° 2+5 SCANS

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D-01

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SAFETY RELIEF VALVE PIPING -
SHEET NO. 1"**

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PRIMARY COOLANT PRESSURIZER
SAFETY RELIEF VALVE PIPING -
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D-03

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PRESSURIZER - INSULATION
SECTIONS & DETAILS"**

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D-04