

From: Carl Lyon
To: Donald Jones; Karla Stoedter; Mark Ring
Date: 11/20/02 12:28PM
Subject: Quad Cities CRD Welds

During a conference call on 11/6, the staff informed Exelon that it had reviewed the information provided by the licensee and concluded that Section XI, Table IWB-2500-1, Category B-O, Item B14.10 (Reactor Vessel - Welds in CRD Housing), applies to the Quad Cities CRD housing welds. Therefore, the welds should be included in the ISI program.

Subsequent to the conference call, the licensee said that in the process of preparing a request for Code interpretation of the issue, their contractor had given them a copy of an NRC letter and SE to Hatch, dated 9/29/86, with an attached TER prepared by SAIC. The NRC letter responded to a request for relief from inspection of the CRD welds by informing Hatch that relief was not required, because the welds were exempt in accordance with IWB-1220. Exelon asked why Quad Cities should not also be exempt, since the staff position on Quad Cities appeared to be a "new or different staff position from a previously applicable position."

Following a cursory search of NUDOCS, I showed to EMCB staff a copy of an NRC letter and SE to Grand Gulf, dated 7/22/86, with an attached TER prepared by SAIC, granting relief, not exemption, from inspection of the CRD welds. I also reviewed ISI documentation from a number of BWRs and noted that every one, including 9 with RCIC, included the CRD housing welds in their ISI program.

Review of past relief requests show some inconsistency by the staff in the application of ISI requirements in the late 1980s. If the Hatch request were made today, however, it would be evaluated for relief by the staff. It would not be viewed as a requirement from which exemption was granted by IWB-1220.

Notwithstanding the inconsistency between the responses to Hatch and Grand Gulf in 1986, for whatever reason it occurred, the staff's conclusion that the CRD welds should be included in the Quad Cities ISI program is unchanged. The IWB-1220 exemption does not apply to the CRD housing welds. The licensee may, however, apply for relief from the requirements of the Code.

Several options are available to Exelon, such as:

- (1) include the CRD welds in their ISI program and inspect them in accordance with Code requirements,
- (2) submit a relief request to the NRC, which the staff will review in accordance with the normal licensing action process, or
- (3) submit a request to the Code committee for interpretation of the requirement.

The last option may be the best in order to get a definitive answer; however, the staff is not obligated to accept the Code committee's position.

CC: Keith Wichman; Lakshminaras Raghavan; Lawrence Rossbach; Michael Kurth;
Terence Chan

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