



# ***Supplement 10 Requalification***

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Performance Demonstration**

**EPRI NDE Center**



## ***Present Status***

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- ▲ **Presently, there are no requalification requirements contained in Appendix VIII**
  - Requalification of personnel is covered under Appendix VII
- ▲ **10CFR50 and Reg. Guide 0313 require requalification for IGSCC detection, length and depth sizing**
- ▲ **In addition, 10CFR50 and Reg. Guide 0313 requires the same for the examination of weld overlay repairs**
- ▲ **These requirements were augmented requirements which are in addition to the requirements of Appendix VIII and are implemented under the BWR utilities licensing agreements**



## ***Present Status***

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- ▲ **Prior to Supplement 10 BWR licensees required personnel who performed examinations on dissimilar metal welds to be qualified for IGSCC examination under the 3 party agreement or more recently the PDI program for Supplement 2 with IGSCC**
  - This is still a requirement of the PDI program
- ▲ **Presently, in order to perform examinations on Dissimilar metal welds in BWR's procedures, personnel and equipment must be qualified in accordance Supplement 10 or with PDI's implementation of Supplement 10 and have a current Supplement 2 IGSCC qualification for detection and sizing as applicable**



## ***Pass Rates for Supplement 10***

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- ▲ **Manual Piping and Aust. Detection w/ IGSCC**
  - 32.87% for first attempt
  - 50% for second attempt
- ▲ **Automated Piping and Aust. Detection w/ IGSC**
  - 45.71 for first attempt
  - 60.00% second attempt
- ▲ **Manual Dissimilar Metal Weld Detection**
  - 48.28% for first attempt
  - 80.00% for second attempt
- ▲ **Automated Dissimilar Metal Weld Detection**
  - 100% for first attempt
  - (None required) second attempt



## ***PDI Position***

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- ▲ Insufficient data exists to support additional qualification requirements for dissimilar metal welds**
- ▲ Current requalification rules and mandatory hands on practice are sufficient to maintain proficiency**
- ▲ Present industry resources should be concentrated on improving examination techniques and procedures and removing or limiting current Supplement 10 examination limitations not on developing requalification criteria**



## ***PDI Actions***

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### **▲ EPRI/NDEC/PDI**

- Is purchasing practice samples which is felt will improve past rates
- Developing training program specific to dissimilar metal weld examinations

### **▲ PDI will continue monitor demonstration performance and report it to NRC**

### **▲ PDI feels that Requalification testing does little to help examiners stay proficient and only adds to cost of examination and further depletes the already shrinking workforce**

### **▲ PDI would like to explore other options, which could be used to maintain proficiency short of requalification for not only Supplement 10,m but also for current IGSCC qualifications**

- Enhanced hands on practice
- Training