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September 9, 2003

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
ASME Section XI Relief Request to Use Alternative Techniques for Examining
Dissimilar Metal Welds

REFERENCE: (a) Letter from Ms. M. Gamberoni (NRC) to Mr. C. H. Cruse (BGE), dated April 5, 2000, Safety Evaluation of Proposed Alternate American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) Section XI, 1998 Edition for the Third 10-Year Inspection Interval – Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2 (TAC Nos. MA4647 and MA4648)

Pursuant to 10 CFR 50.55a(a)(3)(i), Calvert Cliffs Nuclear Power Plant, Inc. (CCNPP) hereby proposes alternatives to the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) requirements concerning the pressure retaining welds subject to examination using ASME Section XI, Appendix VIII, Supplement 10 criteria for the Third Ten-Year Inservice Inspection interval. Paragraph 50.55a(a)(3)(i) allows the use of alternatives to the requirements of Paragraph 50.55a(g), that provide an acceptable level of quality and safety, when authorized by the Director of the Office of Nuclear Reactor Regulation.

The Third Ten-Year Inservice Inspection Program Plan for Calvert Cliffs Units 1 and 2 meets the requirements of the 1998 Edition, no Addenda of Section XI of the ASME Code (except for Subsections IWE and IWL), as approved by Nuclear Regulatory Commission letter (Reference a).

RELIEF REQUEST

Supplement 10 to Appendix VIII, "Performance Demonstration for Ultrasonic Examination Systems," of Section XI of the ASME Code contains the qualification requirements for procedures, equipment, and personnel involved with examining dissimilar metal welds using ultrasonic techniques. In lieu of these ASME Code requirements, CCNPP proposes to use the dissimilar metal weld criteria of the Performance Demonstration Initiative (PDI) Program. Similar relief requests have been previously approved for other

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licensees including Exelon Nuclear on July 16, 2003, and Entergy Nuclear Generation Company on May 8, 2003. The detailed relief request and the justification are provided in Attachments (1) and (2).

SAFETY COMMITTEE REVIEW

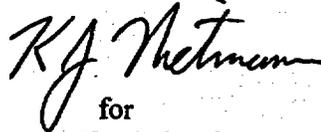
The proposed relief request has been reviewed by our Plant Operations and Safety Review Committee, and they have concluded that the proposed alternatives provide an acceptable level of quality and safety.

SCHEDULE

We plan to use the PDI Program criteria in the upcoming Calvert Cliffs Unit 1 Spring 2004 refueling outage (currently scheduled to begin in early April 2004). We request that the Nuclear Regulatory Commission review and approve our proposed alternative for use during this outage.

Should you have questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,



for
George Vanderheyden

Vice President -- Calvert Cliffs Nuclear Power Plant

GV/GT/bjd

- Attachments: (1) Relief Request To Use Alternative Techniques for Examining Dissimilar Metal Welds
(2) Supplement 10 -- Qualification Requirements for Dissimilar Metal Piping Welds

cc: J. Petro, Esquire
J. E. Silberg, Esquire
Director, Project Directorate I-1, NRC
G. S. Vissing, NRC
H. J. Miller, NRC
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ATTACHMENT (1)

**RELIEF REQUEST TO USE ALTERNATIVE TECHNIQUES
FOR EXAMINING DISSIMILAR METAL WELDS**

ATTACHMENT (1)
RELIEF REQUEST TO USE ALTERNATIVE TECHNIQUES
FOR EXAMINING DISSIMILAR METAL WELDS

COMPONENT FOR WHICH RELIEF IS REQUESTED:

Dissimilar metal piping welds subject to ultrasonic examination using procedures, personnel, and equipment qualified to the American Society of Mechanical Engineers (ASME) Code, Section XI, Appendix VIII, Supplement 10, "Qualification Requirements for Dissimilar Metal Piping Welds."

CODE REQUIREMENTS FOR WHICH RELIEF IS REQUESTED:

The 1998 Edition no Addenda of ASME Section XI Appendix VIII, Supplement 10 identify the following specific requirements that are included in this relief request.

- Item 1 - Paragraph 1.1(b) states in part - Pipe diameters within a range of 0.9 to 1.5 times a nominal diameter shall be considered equivalent.
- Item 2 - Paragraph 1.1(d) states - All flaws in the specimen set shall be cracks.
- Item 3 - Paragraph 1.1(d)(1) states - At least 50% of the cracks shall be in austenitic material. At least 50% of the cracks in austenitic material shall be contained wholly in weld or buttering material. At least 10% of the cracks shall be in ferritic material. The remainder of the cracks may be in either austenitic or ferritic material.
- Item 4 - Paragraph 1.2(b) states in part - The number of unflawed grading units shall be at least twice the number of flawed grading units.
- Item 5 - Paragraphs 1.2(c)(1) and 1.3(c) state in part - At least 1/3 of the flaws, rounded to the next higher whole number, shall have depths between 10% and 30% of the nominal pipe wall thickness. Paragraph 1.4(b) distribution table requires 20% of the flaws to have depths between 10% and 30%.
- Item 6 - Paragraph 2.0 first sentence states - The specimen inside surface and identification shall be concealed from the candidate.
- Item 7 - Paragraph 2.2(b) states in part - The regions containing a flaw to be sized shall be identified to the candidate.
- Item 8 - Paragraph 2.2(c) states in part - For a separate length sizing test, the regions of each specimen containing a flaw to be sized shall be identified to the candidate.
- Item 9 - Paragraph 2.3(a) states - For the depth sizing test, 80% of the flaws shall be sized at a specific location on the surface of the specimen identified to the candidate.
- Item 10 - Paragraph 2.3(b) states - For the remaining flaws, the regions of each specimen containing a flaw to be sized shall be identified to the candidate. The candidate shall determine the maximum depth of the flaw in each region.
- Item 11 - Table VIII-S2-1 provides the false call criteria when the number of unflawed grading units is at least twice the number of flawed grading units.

PROPOSED ALTERNATIVE:

Attachment (2) identifies Supplement 10 current requirements and the proposed alternatives, which allows them to be viewed in context. It also identifies additional clarifications and enhancements for

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RELIEF REQUEST TO USE ALTERNATIVE TECHNIQUES FOR EXAMINING DISSIMILAR METAL WELDS

information. It has been approved by the Board on Nuclear Codes and Standards (BC03-81) along with an implementing Code Case (N-695).

SUPPORTING INFORMATION:

Item 1 - The proposed alternative to Paragraph 1.1(b) states:

"The specimen set shall include the minimum and maximum pipe diameters and thicknesses for which the examination procedure is applicable. Pipe diameters within a range of 1/2 inch (13 mm) of the nominal diameter shall be considered equivalent. Pipe diameters larger than 24 inches (610 mm) shall be considered to be flat. When a range of thicknesses is to be examined, a thickness tolerance of +25% is acceptable."

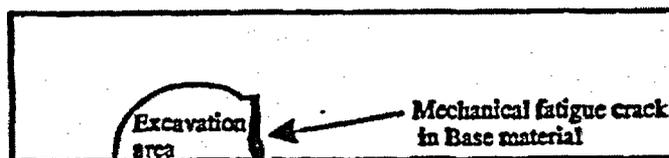
Technical Basis - The change in the minimum pipe diameter tolerance from 0.9 times the diameter to the nominal diameter minus 0.5 inch provides tolerances more in line with industry practice. Though the alternative is less stringent for small pipe diameters, they typically have a thinner wall thickness than larger diameter piping. A thinner wall thickness results in shorter sound path distances that reduce the detrimental effects of the curvature. This change maintains consistency between Supplement 10 and the recent revision to Supplement 2.

Item 2 - The proposed alternative to Paragraph 1.1(d) states:

"At least 60% of the flaws shall be cracks, the remainder shall be alternative flaws. Specimens with intergranular stress corrosion cracking (IGSCC) shall be used when available. Alternative flaws, if used, shall provide crack-like reflective characteristics and shall be limited to the case where implantation of cracks produces spurious reflectors that are uncharacteristic of service induced flaws. Alternative flaw mechanisms shall have a tip width of less than or equal to 0.002 inch (.05 mm).

Note: to avoid confusion the proposed alternative modifies instances of the term "cracks" or "cracking" to the term "flaws" because of the use of alternative flaw mechanisms."

Technical Basis - As illustrated below, implanting a crack requires excavation of the base material on at least one side of the flaw. While this may be satisfactory for ferritic materials, it does not produce a useable axial flaw in austenitic materials because the sound beam, which normally passes only through base material, must now travel through weld material on at least one side, producing an unrealistic flaw response. In addition, it is important to preserve the dendritic structure present in field welds that would otherwise be destroyed by the implantation process. To resolve these issues, the proposed alternative allows the use of up to 40% fabricated flaws as an alternative flaw mechanism under controlled conditions. The fabricated flaws are isostatically compressed which produces ultrasonic reflective characteristics similar to tight cracks.



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Item 3 - The proposed alternative to Paragraph 1.1(d)(1) states:

"At least 80% of the flaws shall be contained wholly in weld or buttering material. At least one and a maximum of 10% of the flaws shall be in ferritic base material. At least one and a maximum of 10% of the flaws shall be in austenitic base material."

Technical Basis - Under the current Code, as few as 25% of the flaws are contained in austenitic weld or buttering material. Recent experience has indicated that flaws contained within the weld are the likely scenarios. The metallurgical structure of austenitic weld material is ultrasonically more challenging than either ferritic or austenitic base material. The proposed alternative is therefore more challenging than the current Code.

Item 4 - The proposed alternative to Paragraph 1.2(b) states:

"Detection sets shall be selected from Table VIII-S10-1. The number of unflawed grading units shall be at least one and a half times the number of flawed grading units."

Technical Basis - Table VIII-S10-1 provides a statistically based ratio between the number of unflawed grading units and the number of flawed grading units. The proposed alternative reduces the ratio to 1.5 times to reduce the number of test samples to a more reasonable number from the human factors perspective. However, the statistical basis used for screening personnel and procedures is still maintained at the same level with competent personnel being successful and less skilled personnel being unsuccessful. The acceptance criteria for the statistical basis are in Table VIII-S10-1.

Item 5 - The proposed alternative to the flaw distribution requirements of Paragraph 1.2(c)(1) (detection) and 1.3(c) (length) is to use the Paragraph 1.4(b) (depth) distribution table (see below) for all qualifications.

Flaw Depth (% Wall Thickness)	Minimum Number of Flaws
10-30%	20%
31-60%	20%
61-100%	20%

Technical Basis - The proposed alternative uses the depth sizing distribution for both detection and depth sizing because it provides for a better distribution of flaw sizes within the test set. This distribution allows candidates to perform detection, length, and depth sizing demonstrations simultaneously utilizing the same test set. The requirement that at least 75% of the flaws shall be in the range of 10 to 60% of wall thickness provides an overall distribution tolerance yet the distribution uncertainty decreases the possibilities for testmanship that would be inherent to a uniform distribution. It must be noted that it is possible to achieve the same distribution utilizing the present requirements, but it is preferable to make the criteria consistent.

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Item 6 - The proposed alternative to Paragraph 2.0 first sentence states:

"For qualifications from the outside surface, the specimen inside surface and identification shall be concealed from the candidate. When qualifications are performed from the inside surface, the flaw location and specimen identification shall be obscured to maintain a 'blind test.' "

Technical Basis - The current Code requires that the inside surface be concealed from the candidate. This makes qualifications conducted from the inside of the pipe [e.g., pressurized water reactor (PWR) nozzle to safe end welds] impractical. The proposed alternative differentiates between inside diameter (ID) and outside diameter (OD) scanning surfaces, requires that they be conducted separately, and requires that flaws be concealed from the candidate. This is consistent with the recent revision to Supplement 2.

Items 7 and 8 - The proposed alternatives to Paragraph 2.2(b) and 2.2(c) state:

"... containing a flaw to be sized may be identified to the candidate."

Technical Basis - The current Code requires that the regions of each specimen containing a flaw to be length-sized shall be identified to the candidate. The candidate shall determine the length of the flaw in each region (Note, that length and depth sizing use the term "regions" while detection uses the term "grading units" - the two terms define different concepts and are not intended to be equal or interchangeable). To ensure security of the samples, the proposed alternative modifies the first "shall" to a "may" to allow the test administrator the option of not identifying specifically where a flaw is located. This is consistent with the recent revision to Supplement 2.

Items 9 and 10 - The proposed alternative to Paragraph 2.3(a) and 2.3(b) state:

"... regions of each specimen containing a flaw to be sized may be identified to the candidate."

Technical Basis - The current Code requires that a large number of flaws be sized at a specific location. The proposed alternative changes the "shall" to a "may" which modifies this from a specific area to a more generalized region to ensure security of samples. This is consistent with the recent revision to Supplement 2. It also incorporates terminology from length-sizing for additional clarity.

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Item 11 - The proposed alternative modifies the acceptance criteria of Table VIII-S2-1 as follows:

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TABLE VIII-S2 1

PERFORMANCE DEMONSTRATION DETECTION TEST ACCEPTANCE CRITERIA

Detection Test Acceptance Criteria		False Call Test Acceptance Criteria	
No. of Flawed Grading Units	Minimum Detection Criteria	No. of Unflawed Grading Units	Maximum Number of False Calls
5	5	10	0
6	6	12	1
7	6	14	1
8	7	16	2
9	7	18	2
10	8	20 15	3 2
11	9	22 17	3 3
12	9	24 18	3 3
13	10	26 20	4 3
14	10	28 21	5-3
15	11	30 23	5 3
16	12	32 24	6 4
17	12	34 26	6 4
18	13	36 27	7 4
19	13	38 29	7 4
20	14	40 30	8 5

Technical Basis - The proposed alternative is identified as new Table VIII-S10-1 above. It was modified to reflect the reduced number of unflawed grading units and allowable false calls. As a part of ongoing Code activities, Pacific North West National Laboratory has reviewed the statistical significance of these revisions and offered the revised Table VIII-S2-1.

CONCLUSION:

Calvert Cliffs believes the proposed alternatives to Supplement 10, as administered by the Electric Power Research Institute-Performance Demonstration Initiative Program, provide an acceptable level of quality and safety.

ATTACHMENT (2)

**SUPPLEMENT 10 – QUALIFICATION REQUIREMENTS
FOR DISSIMILAR METAL PIPING WELDS**

ATTACHMENT (2)

SUPPLEMENT 10 - QUALIFICATION REQUIREMENTS FOR DISSIMILAR METAL PIPING WELDS		
Current Requirement	Proposed Change	Reasoning
	1.0 SCOPE	
	Supplement 10 is applicable to dissimilar metal piping welds examined from either the inside or outside surface. Supplement 10 is not applicable to piping welds containing supplemental corrosion resistant clad (CRC) applied to mitigate Intergranular Stress Corrosion Cracking (IGSCC).	A scope statement provides added clarity regarding the applicable range of each individual Supplement. The exclusion of CRC provides consistency between Supplement 10 and the recent revision to Supplement 2 (Reference BC 00-755). Note, an additional change identifying CRC as "in course of preparation" is being processed separately.
1.0 SPECIMEN REQUIREMENTS	2.0 SPECIMEN REQUIREMENTS	Renumbered
Qualification test specimens shall meet the requirements listed herein, unless a set of specimens is designed to accommodate specific limitations stated in the scope of the examination procedure (e.g., pipe size, weld joint configuration, access limitations). The same specimens may be used to demonstrate both detection and sizing qualification.	Qualification test specimens shall meet the requirements listed herein, unless a set of specimens is designed to accommodate specific limitations stated in the scope of the examination procedure (e.g., pipe size, weld joint configuration, access limitations). The same specimens may be used to demonstrate both detection and sizing qualification.	No Change
1.1 General. The specimen set shall conform to the following requirements.	2.1 General. The specimen set shall conform to the following requirements.	Renumbered
	(a) The minimum number of flaws in a test set shall be ten.	New, changed minimum number of flaws to 10 so sample set size for detection is consistent with length and depth sizing.
(a) Specimens shall have sufficient volume to minimize spurious reflections that may interfere with the interpretation process.	(b) Specimens shall have sufficient volume to minimize spurious reflections that may interfere with the interpretation process.	Renumbered

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SUPPLEMENT 10 - QUALIFICATION REQUIREMENTS FOR DISSIMILAR METAL PIPING WELDS

Current Requirement	Proposed Change	Reasoning
<p>(b) The specimen set shall include the minimum and maximum pipe diameters and thicknesses for which the examination procedure is applicable. Pipe diameters within a range of 0.9 to 1.5 times a nominal diameter shall be considered equivalent. Pipe diameters larger than 24 inches shall be considered to be flat. When a range of thicknesses is to be examined, a thickness tolerance $\pm 25\%$ is acceptable.</p>	<p>(c) The specimen set shall include the minimum and maximum pipe diameters and thicknesses for which the examination procedure is applicable. Pipe diameters within a range of 1/2 inch (13 mm) of the nominal diameter shall be considered equivalent. Pipe diameters larger than 24 inches (610 mm) shall be considered to be flat. When a range of thicknesses is to be examined, a thickness tolerance of $\pm 25\%$ is acceptable.</p>	<p>Renumbered, metricated, the change in pipe diameter tolerance provides consistency between Supplement 10 and the recent revision to Supplement 2. (Reference BC 00-755)</p>
<p>(c) The specimen set shall include examples of the following fabrication condition:</p>	<p>(d) The specimen set shall include examples of the following fabrication conditions:</p>	<p>Renumbered, changed "condition" to "conditions."</p>
<p>(1) Geometric conditions that normally require discrimination from flaws (e.g., counterbore or weld root conditions, cladding, weld buttering, remnants of previous welds, adjacent welds in close proximity);</p>	<p>(1) Geometric and material conditions that normally require discrimination from flaws (e.g., counterbore or weld root conditions, cladding, weld buttering, remnants of previous welds, adjacent welds in close proximity, and weld repair areas);</p>	<p>Clarification, some of the items listed relate to material conditions rather than geometric conditions. Weld repair areas were added as a result of recent field experiences.</p>
<p>(2) Typical limited scanning surface conditions (e.g., diametrical shrink, single-side access due to nozzle and safe end external tapers).</p>	<p>(2) Typical limited scanning surface conditions (e.g., weld crowns, diametrical shrink, single-side access due to nozzle and safe end external tapers for outside surface examinations; and internal tapers, exposed weld roots, and cladding conditions for inside surface examinations). Qualification requirements shall be satisfied separately for outside surface and inside surface examinations.</p>	<p>Differentiates between ID and OD scanning surface limitations. Requires that ID and OD qualifications be conducted independently {Note, new paragraph 2.0 (identical to old paragraph 1.0) provides for alternatives when "a set of specimens is designed to accommodate specific limitations stated in the scope of the examination procedure."}</p>
<p>(d) All flaws in the specimen set shall be cracks.</p>		<p>Deleted this requirement, because new paragraph 2.3 below provides for the use of "alternative flaws" in lieu of cracks.</p>

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SUPPLEMENT 10 - QUALIFICATION REQUIREMENTS FOR DISSIMILAR METAL PIPING WELDS

Current Requirement	Proposed Change	Reasoning
<p>(1) At least 50% of the cracks shall be in austenitic material. At least 50% of the cracks in austenitic material shall be contained wholly in weld or buttering material. At least 10% of the cracks shall be in ferritic material. The remainder of the cracks may be in either austenitic or ferritic material.</p>	<p>2.2 Flaw Location. At least 80% of the flaws shall be contained wholly in weld or buttering material. At least one and a maximum of 10% of the flaws shall be in ferritic base material. At least one and a maximum of 10% of the flaws shall be in austenitic base material.</p>	<p>Renumbered and re-titled. Flaw location percentages redistributed because field experience indicates that flaws contained in weld or buttering material are probable and represent the more stringent ultrasonic detection scenario.</p>
<p>(2) At least 50% of the cracks in austenitic base material shall be either IGSCC or thermal fatigue cracks. At least 50% of the cracks in ferritic material shall be mechanically or thermally induced fatigue cracks.</p>	<p>2.3 Flaw Type. (a) At least 60% of the flaws shall be cracks; the remainder shall be alternative flaws. Specimens with IGSCC shall be used when available. Alternative flaws, if used, shall provide crack-like reflective characteristics and shall be limited to the case where implantation of cracks produces spurious reflectors that are uncharacteristic of service-induced flaws. Alternative flaw mechanisms shall have a tip width of less than or equal to 0.002 inch (.05 mm).</p>	<p>Renumbered and re-titled. Alternative flaws are required for placing axial flaws in the HAZ of the weld and other areas where implantation of a crack produces metallurgical conditions that result in an unrealistic ultrasonic response. This is consistent with the recent revision to Supplement 2 (Reference BC 00-755). The 40% limit on alternative flaws is needed to support the requirement for up to 70% axial flaws. Metricated.</p>
<p>(3) At least 50% of the cracks shall be coincident with areas described in (c) above.</p>	<p>(b) At least 50% of the flaws shall be coincident with areas described in 2.1(d) above.</p>	<p>Renumbered. Due to inclusion of "alternative flaws," use of "cracks" is no longer appropriate.</p>

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SUPPLEMENT 10 - QUALIFICATION REQUIREMENTS FOR DISSIMILAR METAL PIPING WELDS

Current Requirement	Proposed Change	Reasoning								
	<p>2.4 Flaw Depth. All flaw depths shall be greater than 10% of the nominal pipe wall thickness. Flaw depths shall exceed the nominal clad thickness when placed in cladding. Flaws in the sample set shall be distributed as follows:</p> <table border="1" data-bbox="751 436 1344 612"> <thead> <tr> <th>Flaw Depth (% Wall Thickness)</th> <th>Minimum Number of Flaws</th> </tr> </thead> <tbody> <tr> <td>10-30%</td> <td>20%</td> </tr> <tr> <td>31-60%</td> <td>20%</td> </tr> <tr> <td>61-100%</td> <td>20%</td> </tr> </tbody> </table> <p>At least 75% of the flaws shall be in the range of 10 to 60% of wall thickness.</p>	Flaw Depth (% Wall Thickness)	Minimum Number of Flaws	10-30%	20%	31-60%	20%	61-100%	20%	<p>Moved from old paragraph 1.3(c) and 1.4 and re-titled. Consistency between detection and sizing specimen set requirements (e.g., 20% vs. 1/3 flaw depth increments, e.g., original paragraph 1.3(c)).</p>
Flaw Depth (% Wall Thickness)	Minimum Number of Flaws									
10-30%	20%									
31-60%	20%									
61-100%	20%									
<p>1.2 Detection Specimens. The specimen set shall include detection specimens that meet the following requirements.</p>		<p>Renumbered and re-titled and moved to paragraph 3.1(a). No other changes.</p>								
<p>(a) Specimens shall be divided into grading units. Each grading unit shall include at least 3 inches of weld length. If a grading unit is designed to be unflawed, at least 1 inch of unflawed material shall exist on either side of the grading unit. The segment of weld length used in one grading unit shall not be used in another grading unit. Grading units need not be uniformly spaced around the pipe specimen.</p>		<p>Renumbered to paragraph 3.1(a)(1). No other changes.</p>								
<p>(b) Detection sets shall be selected from Table VIII-S2- 1. The number of unflawed grading units shall be at least twice the number of flawed grading units.</p>		<p>Moved to new paragraph 3.1(a)(2).</p>								

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SUPPLEMENT 10 - QUALIFICATION REQUIREMENTS FOR DISSIMILAR METAL PIPING WELDS		
Current Requirement	Proposed Change	Reasoning
(c) Flawed grading units shall meet the following criteria for flaw depth, orientation, and type.		Flaw depth requirements moved to new paragraph 2.4, flaw orientation requirements moved to new paragraph 2.5, flaw type requirements moved to new paragraph 2.3, "Flaw Type."
(1) All flaw depths shall be greater than 10% of the nominal pipe wall thickness. At least 1/3 of the flaws, rounded to the next higher whole number, shall have depths between 10% and 30% of the nominal pipe wall thickness. However, flaw depths shall exceed the nominal clad thickness when placed in cladding. At least 1/3 of the flaws, rounded to the next whole number, shall have depths greater than 30% of the nominal pipe wall thickness.		Deleted, for consistency in sample sets the depth distribution is the same for detection and sizing.
(2) At least 30% and no more than 70% of the flaws, rounded to the next higher whole number, shall be oriented axially. The remainder of the flaws shall be oriented circumferentially.	2.5 Flaw Orientation. (a) For other than length sizing specimens, at least 30% and no more than 70% of the flaws, rounded to the next higher whole number, shall be oriented axially. The remainder of the flaws shall be oriented circumferentially.	Note this distribution is applicable for detection and depth sizing. Paragraph 2.5(b)(1) requires that all length-sizing flaws be oriented circumferentially.
1.3 Length-Sizing Specimens. The specimen set shall include length-sizing specimens that meet the following requirements.		Renumbered and re-titled and moved to new paragraph 3.2.
(a) All length-sizing flaws shall be oriented circumferentially.		Moved, included in new paragraph 3.2(a).
(b) The minimum number of flaws shall be ten.		Moved, included in new paragraph 2.1 above.

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SUPPLEMENT 10 - QUALIFICATION REQUIREMENTS FOR DISSIMILAR METAL PIPING WELDS										
Current Requirement	Proposed Change	Reasoning								
(c) All flaw depths shall be greater than 10% of the nominal pipe wall thickness. At least 1/3 of the flaws, rounded to the next higher whole number, shall have depths between 10% and 30% of the nominal pipe wall thickness. However, flaw depth shall exceed the nominal clad thickness when placed in cladding. At least 1/3 of the flaws, rounded to the next whole number, shall have depths greater than 30% of the nominal pipe wall thickness.		Moved, included in new paragraph 2.4 above after revision for consistency with detection distribution.								
1.4 Depth Sizing Specimens. The specimen set shall include depth sizing specimens that meet the following requirements.		Moved, included in new paragraphs 2.1, 2.3, 2.4.								
(a) The minimum number of flaws shall be ten.		Moved, included in new paragraph 2.1.								
(b) Flaws in the sample set shall not be wholly contained within cladding and shall be distributed as follows:		Moved, potential conflict with old paragraph 1.2(c)(1); "However, flaw depths shall exceed the nominal clad thickness when placed in cladding." Revised for clarity and included in new paragraph 2.4.								
<table border="0"> <thead> <tr> <th><u>Flaw Depth (% Wall Thickness)</u></th> <th><u>Minimum Number of Flaws</u></th> </tr> </thead> <tbody> <tr> <td>10-30%</td> <td>20%</td> </tr> <tr> <td>31-60%</td> <td>20%</td> </tr> <tr> <td>61-100%</td> <td>20%</td> </tr> </tbody> </table> <p>The remaining flaws shall be in any of the above categories.</p>	<u>Flaw Depth (% Wall Thickness)</u>	<u>Minimum Number of Flaws</u>	10-30%	20%	31-60%	20%	61-100%	20%		Moved, included in paragraph 2.4 for consistent applicability to detection and sizing samples.
<u>Flaw Depth (% Wall Thickness)</u>	<u>Minimum Number of Flaws</u>									
10-30%	20%									
31-60%	20%									
61-100%	20%									
	(b) Sizing Specimen sets shall meet the following requirements.	Added for clarity.								
	(1) All length-sizing flaws shall be oriented circumferentially.	Moved from old paragraph 1.3(a).								

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SUPPLEMENT 10 - QUALIFICATION REQUIREMENTS FOR DISSIMILAR METAL PIPING WELDS		
Current Requirement	Proposed Change	Reasoning
	(2) Depth sizing flaws shall be oriented as in 2.5(a).	Included for clarity. Previously addressed by omission (i.e., length, but not depth had a specific exclusionary statement).
2.0 CONDUCT OF PERFORMANCE DEMONSTRATION	3.0 CONDUCT OF PERFORMANCE DEMONSTRATION	Renumbered
The specimen inside surface and identification shall be concealed from the candidate. All examinations shall be completed prior to grading the results and presenting the results to the candidate. Divulgence of particular specimen results or candidate viewing of unmasked specimens after the performance demonstration is prohibited.	For qualifications from the outside surface, the specimen inside surface and identification shall be concealed from the candidate. When qualifications are performed from the inside surface, the flaw location and specimen identification shall be obscured to maintain a "blind test." All examinations shall be completed prior to grading the results and presenting the results to the candidate. Divulgence of particular specimen results or candidate viewing of unmasked specimens after the performance demonstration is prohibited.	Differentiate between qualifications conducted from the outside and inside surface.
2.1 Detection Test. Flawed and unflawed grading units shall be randomly mixed.	3.1 Detection Qualification.	Renumbered, moved text to paragraph 3.1(a)(3).
	(a) The specimen set shall include detection specimens that meet the following requirements.	Renumbered, moved from old paragraph 1.2.

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SUPPLEMENT 10 - QUALIFICATION REQUIREMENTS FOR DISSIMILAR METAL PIPING WELDS

Current Requirement	Proposed Change	Reasoning
	(1) Specimens shall be divided into grading units. Each grading unit shall include at least 3 inches (76 mm) of weld length. If a grading unit is designed to be unflawed, at least 1 inch (25 mm) of unflawed material shall exist on either side of the grading unit. The segment of weld length used in one grading unit shall not be used in another grading unit. Grading units need not be uniformly spaced around the pipe specimen.	Renumbered, moved from old paragraph 1.2(a). Metricated. No other changes.
	(2) Detection sets shall be selected from Table VIII-S10-1. The number of unflawed grading units shall be at least one and a half times the number of flawed grading units.	Moved from old paragraph 1.2(b). Table revised to reflect a change in the minimum sample set to 10 and the application of equivalent statistical false call parameters to the reduction in unflawed grading units. Human factors due to large sample size.
	(3) Flawed and unflawed grading units shall be randomly mixed.	Moved from old paragraph 2.1.
	(b) Examination equipment and personnel are qualified for detection when personnel demonstrations satisfy the acceptance criteria of Table VIII S10-1 for both detection and false calls.	Moved from old paragraph 3.1. Modified to reflect the 100% detection acceptance criteria of procedures versus personnel and equipment contained in new paragraph 4.0 and the use of 1.5X rather than 2X unflawed grading units contained in new paragraph 3.1(a)(2). Note, the modified table maintains the screening criteria of the original Table VIII-S2-1.
2.2 Length-Sizing Test	3.2 Length-Sizing Test	Renumbered
(a) The length-sizing test may be conducted separately or in conjunction with the detection test.	(a) Each reported circumferential flaw in the detection test shall be length sized.	Provides consistency between Supplement 10 and the recent revision to Supplement 2 (Reference BC 00-755).

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SUPPLEMENT 10 - QUALIFICATION REQUIREMENTS FOR DISSIMILAR METAL PIPING WELDS		
Current Requirement	Proposed Change	Reasoning
(b) When the length-sizing test is conducted in conjunction with the detection test, and less than ten circumferential flaws are detected, additional specimens shall be provided to the candidate such that at least ten flaws are sized. The regions containing a flaw to be sized shall be identified to the candidate. The candidate shall determine the length of the flaw in each region.	(b) When the length-sizing test is conducted in conjunction with the detection test, and less than ten circumferential flaws are detected, additional specimens shall be provided to the candidate such that at least ten flaws are sized. The regions containing a flaw to be sized may be identified to the candidate. The candidate shall determine the length of the flaw in each region.	Change made to ensure security of samples, consistent with the recent revision to Supplement 2 (Reference BC 00-755). Note, length and depth sizing use the term "regions" while detection uses the term "grading units." The two terms define different concepts and are not intended to be equal or interchangeable.
(c) For a separate length-sizing test, the regions of each specimen containing a flaw to be sized shall be identified to the candidate. The candidate shall determine the length of the flaw in each region.	(c) For a separate length-sizing test, the regions of each specimen containing a flaw to be sized may be identified to the candidate. The candidate shall determine the length of the flaw in each region.	Change made to ensure security of samples, consistent with the recent revision to Supplement 2 (Reference BC 00-755).
	(d) Examination procedures, equipment, and personnel are qualified for length sizing when the RMS error of the flaw length measurements, as compared to the true flaw lengths, is less than or equal to 0.75 inch (19 mm).	Moved from old paragraph 3.2(a) includes inclusion of "when" as an editorial change. Metricated.
2.3 Depth Sizing Test	3.3 Depth Sizing Test	Renumbered
(a) For the depth sizing test, 80% of the flaws shall be sized at a specific location on the surface of the specimen identified to the candidate.	(a) The depth sizing test may be conducted separately or in conjunction with the detection test. For a separate depth sizing test, the regions of each specimen containing a flaw to be sized may be identified to the candidate. The candidate shall determine the maximum depth of the flaw in each region.	Change made to ensure security of samples, consistent with the recent revision to Supplement 2 (Reference BC 00-755).

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Current Requirement	Proposed Change	Reasoning
(b) For the remaining flaws, the regions of each specimen containing a flaw to be sized shall be identified to the candidate. The candidate shall determine the maximum depth of the flaw in each region.	(b) When the depth sizing test is conducted in conjunction with the detection test, and less than ten flaws are detected, additional specimens shall be provided to the candidate such that at least ten flaws are sized. The regions of each specimen containing a flaw to be sized may be identified to the candidate. The candidate shall determine the maximum depth of the flaw in each region.	Change made to be consistent with the recent revision to Supplement 2 (Reference BC 00-755). Changes made to ensure security of samples, consistent with the recent revision to Supplement 2 (Reference BC 00-755).
	(c) Examination procedures, equipment, and personnel are qualified for depth sizing when the RMS error of the flaw depth measurements, as compared to the true flaw depths, is less than or equal to 0.125 inch (3 mm).	Moved from old paragraph 3.2(b). Metricated.
3.0 ACCEPTANCE CRITERIA		Delete as a separate category. Moved to new paragraph detection (3.1) and sizing 3.2 and 3.3.
3.1 Detection Acceptance Criteria. Examination procedures, equipment, and personnel are qualified for detection when the results of the performance demonstration satisfy the acceptance criteria of Table VIII-S2-1 for both detection and false calls.		Moved to new paragraph 3.1(b), reference changed to Table S10-1 from S2-1 because of the change in the minimum number of flaws and the reduction in unflawed grading units from 2X to 1.5X.
3.2 Sizing Acceptance Criteria		Deleted as a separate category. Moved to new paragraph on length 3.2 and depth 3.3.
(a) Examination procedures, equipment, and personnel are qualified for length sizing the RMS error of the flaw length measurements, as compared to the true flaw lengths, is less than or equal to 0.75 inches.		Moved to new paragraph 3.2(d), included word "when" as an editorial change.

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SUPPLEMENT 10 - QUALIFICATION REQUIREMENTS FOR DISSIMILAR METAL PIPING WELDS		
Current Requirement	Proposed Change	Reasoning
(b) Examination procedures, equipment, and personnel are qualified for depth sizing when the RMS error of the flaw depth measurements, as compared to the true flaw depths, is less than or equal to 0.125 inches.		Moved to new paragraph 3.3(c).
	4.0 PROCEDURE QUALIFICATION	New
	<p>Procedure qualifications shall include the following additional requirements.</p> <p>(a) The specimen set shall include the equivalent of at least three personnel sets. Successful personnel demonstrations may be combined to satisfy these requirements.</p> <p>(b) Detectability of all flaws within the scope of the procedure shall be demonstrated. Length and depth sizing shall meet the requirements of paragraph 3.2 and 3.3.</p> <p>(c) At least one successful personnel demonstration has been performed.</p> <p>(d) To qualify new values of essential variables, at least one personnel qualification set is required.</p>	<p>New. Based on experience gained in conducting qualifications, the equivalent of 3 personnel sets (i.e., a minimum of 30 flaws) is required to provide enough flaws to adequately test the capabilities of the procedure. Combining successful demonstrations allows a variety of examiners to be used to qualify the procedure. Detectability of each flaw within the scope of the procedure is required to ensure an acceptable personnel pass rate. The last sentence is equivalent to the previous requirements and is satisfactory for expanding the essential variables of a previously qualified procedure.</p>