



Clarification of BWRVIP-75

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Background

- BWRVIP-75 Final SE issued May 14, 2002
- Open Item 3.2, “Proposed Inspection Frequency for Category B Welds”
 - Staff response: “...The BWRVIP stated that Note 4 is only applicable to a limited number of plants that had not completed their initial qualified examinations (Performance Demonstration Initiative (PDI) type examination, as defined in the BWRVIP-75 report) when the subject report was written...”
 - Note 4: If qualified IGSCC examinations have not been conducted, the inspection frequency for Category B welds will be limited to 25 percent of the population every 6 years under NWC conditions, or 25 percent every 10 years under HWC conditions.
- “Initial qualified examinations” were not performed using formal PDI protocol, but were PDI “type”. However, inspection qualification program was accepted by NRC.

Background

- Section 3 of BWRVIP-75 states that “Examination personnel and the procedures used for all the examinations will continue to be in accordance with the program identified in Reference 4 and 5.”
- Reference 5 is the PDI Performance Description, revision 1, change 1, December 1996.
 - Requirement in place at that time and was intended to be followed going forward.
 - Remain in place until such time that the regulations regarding implementation of Appendix VIII would be finalized and supercede the BWRVIP-75 NDE qualification (e.g. 10CFR50 required implementation)

Historical Summary

- Reference 4 is a letter from Bill Russell (NRC) that approved a transition from the old 3-party coordination plan to the PDI process
 - The proposed transition process was intended to go from the original “coordination plan” to Appendix VIII
 - However, NRC could not complete regulatory work
 - The BWROG proposed a different plan in a January 23, 1996 letter which Russell approved. It included information that relates to past examiner qualifications and basis for why they were acceptable
 - Effective 3/1/96 IGSCC examiner qualifications obtained by passing the test of either the PDI Program or the original IGSCC program are satisfactory
 - BWR examiner qualifications are good for a period of 5 years regardless which program was used to obtain the qualification

Historical Summary

- Item #1 was approved with no limitations
- Item #2 was approved with modifications
 - Examiners qualified prior to 3/1/94 were good for 5 years
 - Examiners qualified on or after 3/1/94 were good for three years
 - PDI qualification (not Appendix VIII at this time) is preferred going forward and once someone qualifies using PDI, that will be the required requalification process

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- Assumptions
 - Examiners qualified under either program were acceptable and the examinations performed by such folks would be considered qualified.
 - Procedure used would be qualified as specified in GL 88-01. GL 88-01 states in part: "... the detailed procedure, equipment and examination personnel shall be qualified by a formal program approved by the NRC such as that being conducted in accordance with the NDE Coordination Plan agreed upon by NRC, EPRI and the BWROG..."
- Possible scenario is that an owner used qualified personnel but not a qualified procedure which is not compliant with GL 88-01
- Clarification needed in BWRVIP-75 to eliminate ambiguity regarding definition of "qualified examinations"