

From: Peter Tam
To: David Helker
Date: 1/8/04 4:08PM
Subject: Oyster Creek Relief Request of 6/12/03 (**TAC MB9636, 7, 8, 9**)

Dave:

This refers to Oyster Creek relief request of 6/12/03 (your letter no. 2130-03-20180). Our reviewer, Tom McLellan, has prepared the following draft RAI. We would like to discuss these questions and comments with you in a conference call, during which we will agree on future disposition of these questions and comments.

Request for Relief No. OC-32

Are you aware that when requesting the use of a later Edition of the Code or parts of the Code, all associated requirements needs to be used? In the text of the basis, you referenced Code item numbers instead of weld identification numbers. It is not clear for what components you are requesting an alternative examination schedule, and as noted above, you need to consider applying this request to all welds/components in the ISI program.

Reuest for Relief No. OC-33

Please provide a drawing of the shell-to-flange weld and weld identification number, if available.

Request for Relief No. OC-34

Please provide drawings of the components listed in the tables. In the text of the basis, you referenced Code item numbers instead of weld identification numbers as listed in the tables. It is not clear what weld or inter-radius that you are discussing, or as to why the Code requirement is impractical. We need details for each component/weld as to why the Code requirement is impractical and why the limited coverage provides reasonable assurance of structural integrity of the components.

You need to discuss material type and environment of the component/weld in order to state that you have examined a representative and significant sample of the welds. Further, you need to feel confident that there is no degradation mechanisms occurring or that you have examined fully other nozzles of similar materials and environments and can relate to that experience to the subject components. For example, Weld No. NR02 2-567, there is no discussion why 34.1% ultrasonic coverage provides reasonable assurance of structural integrity of the weld. You need to discuss the various factors as noted above to ensure that the component is structurally sound. But, the discussion is not to be limited to the one weld. Has any of these components received an essentiality 100% surface examination? If needed, you should provide the results of the surface examinations in its basis.

For CRD Return Nozzle N9, it is not clear if you are discussing the shell-to-nozzle weld or nozzle inter-radius examinations. Has this line been capped off to address industry experience with fatigue in these lines? If you are discussing the weld, have you considered the recent experience at Pilgrim? Also, have you considered the BWRVIP requirements and how they apply to these welds? There was no discussion regarding IGSCC susceptibility of the subject

welds which should have been part of your basis of relief (you should also discuss IGSCC in RR OC-35 for piping welds).

If you are discussing the inter-radius of the CRD nozzles, are these nozzles susceptible to thermal fatigue cracking? Did you consider supplementing your UT examinations with an EVT-1 and are you considering the same for the next interval?

These questions and comments aim solely to prepare you and others for the requested conference call. These questions and comments do not at present convey a formal NRC position, nor do they constitute a formal request for additional information.

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CC: David Distel; David Robillard; Thomas Loomis; Thomas McLellan

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Subject: Oyster Creek Relief Request of 6/12/03 (TAC MB9636, 7, 8, 9)
Creation Date: 1/8/04 4:08PM
From: Peter Tam
Created By: PST@nrc.gov

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