

10/20/04  
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**From:** "Graham, D. Rick" <DORGRAHA@southernco.com>  
**To:** <wen@nrc.gov>  
**Date:** 10/14/04 9:21AM  
**Subject:** SNC comments on DG-1125, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1"

Wally,

Listed below are Southern Nuclear's (SNC) comments on draft regulatory guide DG-1125, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1." The first comment is SNC's comment regarding Code Case N-597-1 and the attached word document contains a listing of code cases SNC would like to see included in Revision 14. If these cases were included in Revision 14 of RG 1.147, it would benefit SNC and would eliminate need for relief requests.

8/3/04  
69FR H6597  
⑩

Code Case N-597-1 Comment

- > Table 2, Conditionally Acceptable Section XI Code Cases - Code Case number
- > N-597-1, Requirements for Analytical Evaluation of Pipe Wall Thinning,
- > Section XI, Division, R3/28/01, Condition (2) states " Components affected
- > by flow-accelerated corrosion to which this Code Case are applied must be
- > repaired or replaced in accordance with the constructions code of record
- > and Owner's requirements or a later NRC approved edition of Section III of
- > the ASME Code prior to the value of tp reaching the allowable minimum wall
- > thickness , tmin, as specified in-3622(a)(1) of this Code Case.
- > Alternatively, use of the Code Case is subject to NRC review and approval."
- >
- > Comment: Request for NRC approval to apply Code Case N-497 limits the
- > effective licensee use of the case and should be removed.
- >
- > Discussion: Should the licensee discover a locally-thinned pipe due to FAC
- > late in an outage, one that the rules of N-597 finds acceptable for
- > continued service, the licensee is left scrambling for NRC relief without
- > any assurance of success. The first choice in a thinned component
- > situation would be replacement. However, where a replacement is difficult
- > or impossible, then an N-597 evaluation would be utilized.
- >
- > The Code Case was developed through the ASME Section XI Code Committee
- > with participation by members of the NRC. It is believed that the committee
- > applied sound engineering principles in the development of the Code Case.
- > Additionally, the NRC participated in the development of these rules.
- > Consequently, the NRC should remove the requirement on the licensee to seek
- > additional NRC review and approval for use of the Case.

SNC Code Case Table

> <<SNC\_CC\_REQUESTED\_\_08-20-2004.DOC>>

> If you have any questions, please advise.

- > Thanks,
- > Rick Graham
- > Senior Engineer
- > Southern Nuclear Operating Company

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**POTENTIAL ASME CODE CASES  
To be INCLUDED in REVISION 14 of  
REGULATORY GUIDE 1.147**

**AS of 08 - 20 - 2004**

<b>NUMBER</b>	<b>2001 SUPPLEMENT</b>	<b>DESCRIPTION</b>	<b>INITIAL APPLICABILITY</b>	<b>REMARKS</b>
N-652-1	12	Alternative Requirements to Categories B-G-1, B-G-2, and C-D Bolting Examination Methods and Selection Criteria	1977 Edition	This Code Case clarified the examination methods and notes for these ASME Categories. It would be Nice to Have.
N-665	8 / 9	Alternative Requirements for Angle Beam Measurements Using RL Wave Search Units	1983 Edition with Winter, 1985 Addenda	This clarifies by adding additional instructions on how to calculate the angle. It would be Nice to Have.
N-685	8 / 9	Lighting Requirements for Surface Examination	1998 Edition	Would be Helpful for Hatch after their update since the 2003 Addenda still calls out ASME Section V.
N-686	8 / 9	Alternative Requirements for Visual Examinations, VT-1, VT-2, and VT-3	1989 Edition with 1990 Addenda	Would be Helpful for Hatch after their update since the 2003 Addenda doesn't address this issue. Hatch would have to Submit a Relief Request.

**POTENTIAL ASME CODE CASES**  
**To be INCLUDED in REVISION 14 of**  
**REGULATORY GUIDE 1.147**

**AS of 08 - 20 - 2004**

<b>NUMBER</b>	<b>2001 SUPPLEMENT</b>	<b>DESCRIPTION</b>	<b>INITIAL APPLICABILITY</b>	<b>REMARKS</b>
N-696	10	Piping Examinations from the ID using Appendix VIII Techniques	1989 Edition with 1989 Addenda	This Code Case or a relief request will be needed for Farley and Vogtle on their RPV examinations.
N-700	11	Alternative Rules for the Examination of Integrally Welded Attachments for Class 1, 2, and 3 Vessels	1995 Edition with 1996 Addenda	Would be Helpful for Hatch (RPV) and Vogtle (PZR). Otherwise, SNC would need a relief request.
N-702	12	Alternative Requirement for BWR Nozzle Examinations (Scope Reduction)	1986 Edition	Can be used at Hatch. NRC needs to accept the BWRVIP Report.