

April 28, 2005

Shannon E. Burke
ASME Boiler and Pressure Vessel Committee
Three Park Avenue
New York, NY 10016-5990

Dear Ms. Burke:

The proposed technical inquiry and associated change to ASME Section XI, Paragraph IWA-4160 (attached) is submitted for consideration at the Technical Inquiry Session.

SCOPE

This inquiry addresses ASME Section XI, Paragraph IWA-4160, and the definition of an *“item”* as provided in ASME Section XI, Article IWA-9000.

BACKGROUND

ASME Section XI, Paragraph IWA-4160 requires that an item, when found not to satisfy Division 1 requirements, shall be subjected to an evaluation by the Owner to determine the cause of unacceptability. Prior to returning the item to service, the Owner is also required to evaluate the suitability of the item subjected to repair/replacement activity.

ASME Section XI, Paragraph IWA-9000 defines the term *“item”* as a material, part, appurtenance, piping subassembly, component, or component support. ASME Section XI, Paragraph IWB-2412 refers to *“items or welds”* in various places, e.g., IWB-2412(a)(5) and (b). Therefore, it appears that the definition of *“item”* in IWA-9000 does not include structural welds or weld overlays. If the definition of *“item”* does not include structural welds or weld overlays, it follows that if a weld or weld overlay failed, the Owner would not be required to perform an evaluation to determine the cause of failure in accordance with IWA-4160.

INQUIRY

Is it the intent of ASME Section XI, Paragraph IWA-4160, that deposited structural weld metal, e.g., welds connecting items, or weld overlay, not satisfying the requirements of Division 1 be subjected to an evaluation by the Owner to determine the cause of unacceptability?

PROPOSED REPLY

Yes.

Yours truly,

/RA/

Wallace E. Norris, Member
Subcommittee on Inservice Inspection
Division of Engineering Technology
Office of Nuclear Regulatory Research
U.S. Nuclear Regulatory Commission

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