

Comments; Questions to May 13, 2004 Internal NMC Memorandum from Charles Tomes to
Mark Huting

Text at Issue	Comment	Page, Section, Paragraph
<p>Item 1 states that "PBNP conservatively elected to repair penetration #26 due to:</p> <ul style="list-style-type: none"> a. Presence of a large crack like ultrasonic reflector. b. Verification through review of construction records that this area may have been repaired during construction, and c. Detection through confirmatory dye penetrant examination of small linear indications." 	<p>Statement in 1.a. conflicts with statement in 1st sentence of 4th paragraph on page 5 which states "...the reflector is related to fabrication-related geometry and does not possess characteristics indicative of primary water stress corrosion cracking." Please correct inaccurate statement.</p> <p>Statement in 1.b. indicates review of construction records. This is not correct. Construction records do not indicate repairs to any J-welds. please correct inaccurate statement.</p>	<p>Page 1, Summary, Item 1</p>

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<p>Item 5 states "Additional dye penetrant examination or eddy current examination of the J-groove welds prior to returning to service are not required or recommended since the structural integrity and leakage integrity has been verified and there is no UT indications that suggest a need for confirmatory PT."</p>	<p>Facts as understood by RIII NRC inspector:</p> <p>1) Two patches of crack-like indications were identified in the nozzle 26 J-weld that were not detected by your UT examination.</p> <p>2) Licensee attributes this cracking in part to residual stress from weld repairs on nozzle 26 (ref page 5 second paragraph item 3).</p> <p>3) Licensee has records to suggest other nozzles have weld repairs (e.g. nozzle 27). However reliance on these records is dubious because they are not official construction/ fabrication records and no basis for identifying a weld repair was given.</p> <p>4) Licensee has UT data which identifies recordable weld fabrication anomalies in numerous nozzles.</p> <p>5) Licensee use of UT data for RPV nozzles to identify J-groove welds which have had repairs may not be accurate. Only nozzles with UT anomalies that extend into the nozzle base material were considered recordable. If weld repairs did not involve removal of nozzle base material, the UT performed would not identify a weld repair.</p> <p><u>Conclusions:</u></p> <p>These facts strongly suggest that you likely have other similar undetected cracks in other J-groove welds. If these cracks are acceptable from a leakage integrity standpoint, please provide the analysis that demonstrates this cracking cannot grow through the J-groove weld prior to your next outage. (note this document does not provide this assessment).</p>	<p>Page 1, Summary, Item 5</p>