DRS D-10

NDE Procedure Related Questions/Requests (3/29/04)

Provide NDE-109 (used for determining weld thickness profiles).

1) NDE-163

a) This appears to be a Performance Demonstration Initiative (PDI) qualified procedure. If so, provide the PDI qualification record.
b) Does this procedure limit transducer selection to 60 degree RL? If so why is this necessary for ferritic material?
c) This procedure lacks Code acceptance criteria (Section XI, Table IWB(C)-3410-1 and IWB(C)-3510). Please provide governing procedure which describes who is responsible for applying Code acceptance criteria and how this process is documented.
d) What areas of this procedure deviate from ASME Section V, Article 4 requirements which necessitated use of IWA-2240 procedure demonstration?

2) NDE-171, NDE-164

a) These procedures lack Code acceptance criteria (Section XI, Table IWB(C)-3410-1 and IWB(C)-3514). Please provide governing procedure which describes who is responsible for applying Code acceptance criteria and how this process is documented.

3) NDE-172 & 173

a) These procedures lack Code acceptance criteria (Section XI, Table IWB(C)-3410-1 and IWB(C)-3514). Please provide governing document which describes who is responsible for applying Code acceptance criteria and how this process is documented
b) These procedures require same examination volume for all risk based welds. This appears to be excessive for R1.20 welds not subject to degradation. Please explain basis for using a single examination volume and is this ALARA?

4) NDE-350

a) This procedure contains acceptance criteria unlike other NDE procedures why the difference?
b) Procedure does not address demagnetization required by Section V, Article 7 T-750. Why not? Do you need a Code relief?

5) NDE-451

a) Provide the record of qualification at the non-standard temperature range allowed 45-120 F (e.g. below Code minimum 50 F) (required by T-653 of Article 6 of Section V).
b) Has this procedure ever been used at less than 50 degrees F on Code components? If so provide a copy the examination records.
c) This procedure contains acceptance criteria unlike other NDE procedures why the difference?

6) NDE-750

a) Paragraph 5.4.2(g) of this procedure modified Code words from Section XI, (IWB 3517(h)) to indicate that only leakage near carbon steel bolting was considered a recordable indication. Please provide the NRC approved relief request or Code Case that allows modification to these Code requirements. If no NRC approval, please identify how VT-1 inspectors would confirm bolting was not carbon steel and what actions you will take to meet Code.
b) Procedure does not address or reference surface preparation and pre-cleaning requirements as required by Article 9 of Section V. What actions are being taken to come into compliance with Code?
c) Procedure does not address report or general statement to be completed following the examination as required by Article 9 of Section V. What actions are being taken to come into compliance with Code?
d) This procedures lacks acceptance criteria. Please provide governing document which describes who is responsible for applying acceptance criteria and how this process is documented.

7) NDE-753

a) Procedure does not address or reference surface preparation and pre-cleaning requirements as required by Article 9 of Section V. What actions are being taken to come into compliance with Code?
b) Procedure does not incorporate requirements of Section XI, IWA 5244 with specific instructions applicable to testing of buried Code components. Please explain why these requirements are not in this procedure. Has this procedure been used in conjunction with testing of buried Code components? If so, were the Code requirements followed?
c) This procedures lacks acceptance criteria. Please provide governing document which describes who is responsible for applying acceptance criteria and how this process is documented.

8) NDE-757

a) Provide a copy of the lesson plan and training materials on industry experience for RPV leakage given to the NDE inspectors to comply with Section 2.1.4 of this procedure.

9) Technical Specification 5.5.8.c "Examination Method and Requirements," incorrectly refers to Appendix IV, of ASME Section XI as the applicable requirements. The correct section of the Code which contains the requirements which apply to ET of SG tubes is in Section V, Article 8, Appendix II. This requirement comes from the ASME Code 1998 Edition, 2000 Addenda Section XI, Paragraph IWA-2233 "Eddy Current Examination, " Eddy current examination (ET) shall be conducted in accordance with Section V, Article 8, Appendix II. Please discuss your actions to correct this reference error.