

From: Peter Tam
To: thomas.loomis@exeloncorp.com,david.helker@exeloncorp.com
Date: 9/12/05 7:14AM
Subject: Draft RAI on your 8/16/05 Relief Request (TAC MC8113)

Tom:

The NRC staff has reviewed your submittal and has determined that additional information is necessary to complete the review of Relief Request RR-00-22. Following are draft questions that we would like to discuss with you in a conference call:

(1) On page 2 of the relief request, AmerGen states, "AmerGen Energy Company, LLC (AmerGen) will implement the requirements of ASME Code Case N-638-1 for applicable Class 1 components. N-638-1 will be utilized for, but not limited to, a pressurizer vent nozzle modification scheduled for the upcoming refueling outage in Fall 2005." The relief request also states, "TMI, Unit 1 is requesting the use of the Code Case in its entirety, for the remainder of the interval for all Class 1 components, as specified in the Code Case." The relief request must state the specific conditions under which it may be used, such as is shown in Attachment 2 to the relief request. All other requests for relief shall be made on a case-by-case basis.

(2) Item b) on Page 1 of Attachment 2, "Description of the Modification" states, "A portion of the existing Alloy 600 nozzle outside the pressurizer head and the original NiCrFe weld pad surrounding the vent nozzle will be removed." It is unclear whether this original NiCrFe weld pad is inside the pressurizer or outside the pressurizer, since it does not appear that there was any original weld on the outside of the pressurizer, but the sentence above leads one to believe that this weld is outside the pressurizer. Please clarify this statement.

(3) Item c) on Page 1 of Attachment 2, "Description of the Modification" states, "A weld buildup (i.e. - weld pad) will be deposited at the outer surface of the pressurizer head centered at the vent nozzle opening. The weld pad will be deposited using the Machine Gas Tungsten Arc Welding (GTAW) ambient temperature temper bead process and austenitic stainless steel filler metal." Is the austenitic stainless steel filler metal compatible with the pressurizer head carbon steel base material? That is, how will the licensee prevent decarburization and the resulting loss of fracture toughness in the carbon steel base material? Also, how will the licensee prevent dilution of the austenitic stainless steel filler metal and the resultant potentially brittle weld from chromium dilution?

This e-mail aims solely to prepare you and others for the requested conference call. It does not formally convey an NRC staff position, nor does it formally request for information.

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