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PROCEDURE DEVELOPMENT ED 7635-7 | SHEET 1 of 2 | PROCEDURE ACTIVITY TRACKING NUMBER 91-1849

SECTION 1 - IDENTITY

PROCEDURE NO.: NG-EN-00324 R00 | OLD NO. (for number change): | PROPOSED REVISION NO.: NA | PROPOSED CHANGE NO.: C-2

☐ NEW ☐ CANCELLATION ☒ NORMAL CHANGE ☐ LIMITED CHANGE ☐ TEMPORARY APPROVAL
☐ REVISION ☐ INACTIVATION ☐ RESTRICTED
FROM _____ TO _____ (DATE/EVENT)

PROCEDURE TITLE: BORIC ACID CORROSION CONTROL

PROCEDURE CLASSIFICATION: ☐ SR ☒ QR ☐ N-QR
CHANGE TO? ☐ YES ☑ NO

SAFETY REVIEW REQUIRED? ☒ YES ☐ Performed in conjunction with other activity ☐ NO

PERIODIC REVIEW CYCLE: ☐ 1 YEAR ☑ 2 YEAR ☐ 5 YEAR ☐ OTHER _____

PAT NOS. CLOSED OUT: 90-2201, 90-5436

ACTIVITY SUMMARY:
THE PURPOSE OF THIS CHANGE IS TO CORRECTLY INCORP PREVIOUS ERRORS AND TO COMPLY WITH NEW REGULATIONS. ASME Sect.- XI related requirements removed due to their inclusion in performance procedures. Informati- ☒ CONTINUED

PROCEDURE PREPARER: Tom P. McC Ron- 8374 | DATE: 5/29/91

SECTION 2 - QUALIFIED REVIEW

VALIDATION REQUIRED? ☐ YES ☒ NO | METHOD OF VALIDATION: N/A | ASARA REVIEW REQUIRED? ☐ YES ☒ NO

JUSTIFICATION:
VALIDATION IS NOT REQUIRED SINCE CHANGE PRIMARILY DIRECTS INSPECTIONS TO BE PERFORMED BY SYSTEMS ENGINEERING. THESE INSPECTIONS ARE VISUAL AND WILL IN NO WAY CHALLENGE A SYSTEM, OR SHUTDOWN THE PLANT. AN ☒ CONTINUED

QUALIFIED REVIEWER: [signature] | DATE: 8/2/91 | PROCEDURE SPONSOR: Eugene C Mutrux | DATE: 8/8/91

SECTION 3 - CROSS-DISCIPLINARY REVIEW DUE: _____

REQUIRED	REQUESTED	ORG	CONCURRENCE/DATE	REQUIRED	REQUESTED	ORG	CONCURRENCE/DATE
☐	☑	QA	[signature]	☑	☐	SYSTEMS ENG	[signature] 08/21/91
☑	☐	[illegible]		☐	☐		
☑	☐	PE	TR Bugliarello 8/21/91	☐	☐		
☑	☐	QRS	T. Sylvan 8/7/91	☐	☐		
☑	☐	QAD	[signature] 8/20/91	☐	☐		
☑	☐	PM	[signature]	☐	☐		

SECTION 4 - ATTACHMENTS COMPLETED AND ATTACHED

YES	N/A		YES	N/A		YES	N/A	
☑	☐	DOCUMENT INTERFACE WORKSHEET	☐	☒	VALIDATION CHECKLIST	☑	☐	VENDOR MANUAL CONFIRMATION FORM
☑	☐	COMMITMENT VERIFICATION SUMMARY	☒	☐	SAFETY REVIEW	☒	☐	DOCUMENT REVIEW SHEETS
☐	☑	EDITORIAL VERIFICATION CHECKLIST	☐	☒	SAFETY EVALUATION	☐	☒	REVISED CROSS REFERENCES LIST
						☑	☐	OTHER PCRS

QUALIFIED REVIEWER CONCURRENCE: [signature] | DATE: 8-29-91

SECTION 5 - TEMPORARY APPROVAL

MCRC SRO: N/A | DATE: | PLANT MANAGER/DESIGNEE ☐ NOT REQUIRED N/A | DATE:

SECTION 6 - CONCURRENCE/FINAL APPROVAL

PROCEDURE SPONSOR: [signature] | DATE: 8/28/91 | ☐ SRB N/A | DATE:

APPROVAL AUTHORITY: [signature] | DATE: 8/2/91 | ☐ PLANT MANAGER N/A | DATE:

SECTION 7 - TRAINING/PROCEDURE EFFECTIVITY

TRAINING REQUIRED? ☐ YES ☒ NO | JUSTIFICATION FOR NO TRAINING: Minor Nature of changes. Personnel who will use the procedure are already aware of changes ☐ CONTINUED | TRAINING COMPLETION/EVIDENCE DOCUMENTS ATTACHED? DATE n/a ☐ YES ☐ NO

PROCEDURE EFFECTIVE DATE OR EVENT: Approval plus One day 08/30/91 | PROCEDURE SPONSOR: [signature] | DATE: 8/28/91

SECTION 1 - IDENTITY (CONTINUED)

guidelines also incorporated into procedure

SECTION 2 - QUALIFIED PROCEDURE REVIEW (CONTINUED)

ALARA REVIEW IS NOT REQUIRED SINCE THE CHANGES WILL NOT INCREASE PERSONNEL EXPOSURE, ADVERSELY AFFECT RADIOLOGICAL CONDITIONS, OR GENERATE AN INCREASED AMOUNT OF SOLID, LIQUID, OR GASEOUS RADWASTE.

Additional review of, a validation is not required as the flow changes incorporate informal guidance which has been used since last RFO. Plant staff who will use portions of the procedure that changed are aware, familiar with the requirements and the intent of a validation has already been met.

SECTION 7 - TRAINING/PROCEDURE EFFECTIVITY (CONTINUED)

2 of 3

PROCEDURE DEVELOPMENT ED 7435.4

SHEET 1 OF 1

PROCEDURE ACTIVITY TRACKING NUMBER 89-6872

SECTION 1 - IDENTITY

PROCEDURE NO. NG-EN-00324 /00 | PROPOSED REVISION NO. - | PROPOSED CHANGE NO. C-1 | ☐ NEW ☐ CANCELLATION ☐ REVISION ☐ INACTIVATION | ☒ NORMAL CHANGE ☐ LIMITED CHANGE ☐ TEMPORARY APPROVAL ☐ RESTRICTED FROM ____ TO ____ (DATE/EVENT)

OLD NO. (for number change)

PROCEDURE TITLE: BORIC ACID CORROSION CONTROL

PROCEDURE CLASSIFICATION: ☐ SR ☒ OR ☐ N-QR — CHANGE TO? ☐ YES ☐ NO

SAFETY REVIEW REQUIRED? ☒ YES ☐ Performed in conjunction with other activity ☐ NO

PERIODIC REVIEW CYCLE: ☐ 1 YEAR ☐ 2 YEAR ☐ 5 YEAR ☐ OTHER ____

PAT NOS. CLOSED OUT

ACTIVITY SUMMARY: Clarified that this procedure is not limited to Reactor Coolant System leaks, but applies to leaks on all systems borated for the purpose of reactivity control. Added references and the specific requirements of ASME XI, IWA 5000 for the evaluation and determination of corrective action for identified boric acid leaks during ASME XI pressure testing. ☐ CONTINUED

PROCEDURE PREPARER: K.R. ELLISON x7223 | DATE: 11/7/89

SECTION 2 - QUALIFIED REVIEW

VALIDATION REQUIRED? ☐ YES ☒ NO | METHOD OF VALIDATION: N/A | ALARA REVIEW REQUIRED? ☐ YES ☒ NO

JUSTIFICATION: This administrative procedure change broadens the scope of the procedure only and does not require validation. This change does not increase personnel exposure or generate RADWASTE ☐ CONTINUED

QUALIFIED REVIEWER: [signature] | DATE: 11/29/89 | PROCEDURE SPONSOR: [signature] | DATE: 11/30/89

SECTION 3 - CROSS-DISCIPLINARY REVIEW DUE:

PRIMARY	REQUIRED	REQUESTED	ORG	CONCURRENCE/DATE
☐	☒	☐	OPS	[signature] 1/4/90
☐	☒	☐	SYS. ENG	[signature] 1/10/90
☐	☒	☐	DESIGN ENG	[signature] 1/16/90
☒	☐	☐	PE	[signature] 1-9-90
☐	☐	☐		
☐	☐	☐		

PRIMARY	REQUIRED	REQUESTED	ORG	CONCURRENCE/DATE
☐	☒	☐	QAD	[signature] 1/15/90
☐	☒	☐	PM	[signature] 1/12/90
☐	☐	☐		
☐	☐	☐		
☐	☐	☐		
☐	☐	☐		

SECTION 4 - ATTACHMENTS

COMPLETED AND ATTACHED

YES	N/A		YES	N/A		YES	N/A	
☑	☐	DOCUMENT INTERFACE WORKSHEET	☐	☑	VALIDATION CHECKLIST	☐	☑	VENDOR MANUAL CONFIRMATION FORM
☑	☐	COMMITMENT VERIFICATION SUMMARY	☑	☐	SAFETY REVIEW	☑	☐	DOCUMENT REVIEW SHEETS
☐	☑	EDITORIAL VERIFICATION CHECKLIST	☐	☑	SAFETY EVALUATION	☐	☑	REVISED CROSS REFERENCES LIST
						☐	☑	OTHER ____

PRIMARY REVIEWER CONCURRENCE: [signature] | DATE: 1-16-90 | QUALIFIED REVIEWER: [signature] | DATE: 1/17/90

SECTION 5 - TEMPORARY APPROVAL

MANAGEMENT SRO | DATE | PLANT MANAGER/DESIGNEE ☐ NOT REQUIRED | DATE

SECTION 6 - CONCURRENCE/FINAL APPROVAL

PROCEDURE SPONSOR: [signature] | DATE: 1/19/90 | ☐ PSRB K.R.C. 1/17/90 | DATE

APPROVAL AUTHORITY: [signature] | DATE: 1/19/90 | ☐ PLANT MANAGER | DATE

SECTION 7 - TRAINING/PROCEDURE EFFECTIVITY

TRAINING REQUIRED? ☐ YES ☒ NO

JUSTIFICATION FOR NO TRAINING: THIS CHANGE BROADENS THE SCOPE OF APPLICATION TO INCLUDE ASME XI PRESSURE TESTING. PERSONNEL RESPONSIBLE FOR ASME PRESSURE TESTING PARTICIPATED IN THE DEVELOPMENT OF THIS CHANGE

TRAINING COMPLETION DATE

COPIES OF DOCUMENTS ATTACHED ☐ YES ☒ NO

PROCEDURE EFFECTIVE (DATE OR EVENT): NORMAL - 2 DAY JAN 23 1990 | PROCEDURE SPONSOR: [signature] | DATE: 1/18/90

DBPDS UPDATE BY

DBNPS

PROCEDURE TITLE SHEET
ED 3151

TOLEDO EDISON	TITLE: NUCLEAR GROUP PROCEDURE	NO. NG-EN-00324 REVISION 00 PAGE 1 OF 13
SUBJECT: Boric Acid Corrosion Control	EFFECTIVE DATE: SEP 0 8 1989	INITIATED BY: Patrick Connell
	SUPERSEDES: N/A	APPROVED BY (Division Director):

Approved by: DC Shelton [signature] DATE 8/23/89
Vice President, Nuclear

Released for Controlled Distribution by:
[signature]
Systems & Procedures General Supervisor EFFECTIVE DATE 9/8/89

SRB Review Required? X Yes ___ No

REVISION LOG

Revision Number	Revision Summary
00	This is a new procedure.

LIST OF EFFECTIVE PAGES

Page	Change No.
1	
2	
3	C-2
4	C-2 C-1
5	C-2
6	C-2
7	C-2
7a	C-2
8	C-2
9	C-1
10	C-2
10a	C-2
11	C-2
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12a	C-1
13	C-2

Page	Change No.

Page	Change No.

8/24/91

TABLE OF CONTENTS

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1.0 PURPOSE

1.1 This procedure provides a program which implements systematic measures to ensure that boric acid corrosion at Davis-Besse Nuclear Power Station does not degrade the assurance that the reactor coolant pressure boundary (as defined in 10 CFR 50.2) will have an extremely low probability of abnormal leakage, rapidly propagating failure, or gross rupture. These measures include:

1.1.1 Identification of principal locations where leaks can cause degradation of the primary pressure boundary by boric acid corrosion.

1.1.2 Procedures for locating small coolant leaks.

1.1.3 Methods for conducting examinations and performing engineering evaluations to establish the impact on the reactor coolant pressure boundary when leakage is located.

1.1.4 Corrective actions to prevent recurrences of boric acid leaks.

1.2 Deleted C-2

2.0 APPLICABILITY/SCOPE

2.1 This procedure applies whenever a coolant leak is detected anywhere within the reactor coolant pressure boundary of the Plant. The leak may be in the form of running or dripping water, boric acid residue, or discolored (e.g., rust stained) insulation. C-2

2.1.1 Routine inspections for coolant leaks shall be conducted during the performance of activities governed by the following procedures:

a. DB-PF-03065, ASME Section XI Pressure Tests

b. DB-OP-06901, Plant Startup

c. DB-OP-06903, Plant Shutdown and Cooldown.

2.1.2 Coolant leaks or evidence of coolant leaks may also be detected during routine operation of the Plant or during Plant Maintenance.

2.2 Deleted

2.3 This procedure may also apply whenever excessive Reactor Coolant System (RCS) leakage is identified during the performance of DB-SP-03357, RCS Water Inventory Balance.

2.4 This procedure does not circumvent or alter the intent of DB-OP-00000, Conduct of Operations, or DB-MN-00001, Conduct of Maintenance, which allow immediate corrective actions and minor maintenance without an MWO.

2.5 This procedure does not require implementing procedures.

3.0 REFERENCES

3.1 10 CFR 50.2, Code of Federal Regulations, Title 10 - Energy

3.2 NG-QA-00702, Potential Condition Adverse to Quality Reporting

3.3 Deleted C-2

3.4 DB-PF-03065, ASME Section XI Pressure Tests

3.5 DB-PF-00204, ASME Section XI Pressure Testing

3.6 Deleted C-2

3.7 DB-OP-00000, Conduct of Operations

3.8 DB-OP-02522, Small RCS Leaks

3.9 DB-OP-06901, Plant Startup

3.10 DB-MN-00002, Preventive Maintenance C-2

3.11 DB-OP-06903, Plant Shutdown and Cooldown

3.12 DB-MN-00001, Conduct of Maintenance

3.13 DB-PN-00007, Control of Work

3.14 DB-SP-03357, RCS Water Inventory Balance.

3.15 EPRI NP-5985, Boric Acid Corrosion of Carbon and Low Alloy Steel Pressure Boundary Components in PWRs

(Continued on page 7a)

3.16 NUREG/CR-2827, Boric Acid Corrosion of Ferritic Reactor Components

3.17 NUREG-1095, Evaluation of Responses to IE Bulletin 82-02, Degradation of Threaded Fasteners in Reactor Coolant Pressure Boundary of Pressurized Water Reactor Plants.

3.18 Deleted C-2

3.19 DB-OP-00005, Operating Logs and Reading Sheets

4.0 DEFINITIONS

None

5.0 RESPONSIBILITIES

5.1 The person finding the coolant leak shall be responsible for informing the Shift Supervisor of the location and magnitude of the leak.

5.2 The Shift Supervisor shall be responsible for:

5.2.1 Informing Systems Engineering of the location and magnitude of the leak.

NOTE: When the leak is found during performance of an ASME Section XI pressure test, the person conducting the pressure test shall be responsible for the notification of Systems Engineering.

5.2.2 Determining Plant Shutdown requirements based on RCS leak rates and safety concerns reported by Systems Engineering.

5.3 Systems Engineering shall be responsible for:

NOTE: These actions may be completed by Performance Engineering when the leak or evidence of leakage is noted during an ASME Section XI pressure test and VT-2 visual examination. C-2

5.3.1 Performing and documenting the necessary inspection(s) of the detected leak.

5.3.2 Promptly responding to and informing the Shift Supervisor of any immediate safety concerns raised by the leak inspections.

5.3.3 Taking the necessary actions to:

a. Have boric acid residue removed from the affected component(s) if necessary.

b. Have insulation and other obstructions removed as necessary to gain access to the leak source. C-2

5.3.4 Determining the root cause and source of the coolant leak. C-2

5.3.5 Forwarding the inspection report to Design Engineering and providing additional technical information as required.

5.4 Design Engineering shall be responsible for the following:

5.4.1 Assessing the information provided by Systems Engineering regarding the coolant leak and available industry technical data (e.g., NUREGs and EPRI publications) to:

a. Determine the extent of damage incurred by the affected component(s).

b. Perform any necessary stress and corrosion calculations for determining extent of degradation to the affected pressure boundary.

c. Determine immediate and/or long term corrective actions to stop the leak and prevent recurrence of boric acid corrosion.

6.0 PROCEDURE

6.1 Principal Leak Locations

6.1.1 All areas and components within primary system pressure boundaries are capable of developing leaks. However, when checking for leaks, it is important to know the principal locations where they are most likely to cause degradation of the pressure boundary by boric acid corrosion. The following locations in primary systems have been identified as the most probable locations of leakage: C-2 C-2

a. Steam Generator and Pressurizer manways and handholes

b. Seal Welds

c. Thermowells

d. Reactor Coolant Pump seals and casing flanges

e. Control Rod Drive flanges

f. Piping flanges and bolted connections

g. Valves bonnets and packing glands

h. The Reactor Vessel head o-rings

i. Threaded connections.

6.2 Locating Small Leaks

6.2.1 Personnel in the Plant should always be watchful for coolant leaks whenever performing work on primary systems. Larger coolant leaks are normally readily noticeable. Small coolant leaks, however, may show up only as an accumulation of boric acid residue from the leak source. Once the water has evaporated, boric acid residue appears as a white crystal-like substance. It is normally found where metals are joined together, although it may also be the result of a leak which has dripped down from another source, such as an accumulation on the floor beneath the actual leak. Activities such as valve positioning, equipment operation, corrective maintenance, and routine inspections all provide opportunities for detecting small coolant leaks.

6.2.2 Routine inspections for coolant leaks shall be conducted during the performance of activities governed by the following procedures:

a. DB-PF-03065, ASME Section XI Pressure Tests C-1

b. DB-OP-06901, Plant Startup

c. DB-OP-06903, Plant Shutdown and Cooldown

d. DB-MN-00002, Preventive Maintenance.

6.2.3 Inspections for coolant leaks may also be required by the following procedures:

a. DB-SP-03357, RCS Water Inventory Balance

b. DB-OP-02522, Small RCS Leaks.

6.2.4 Once a coolant leak is discovered in containment:

a. The person finding the leak shall:

1. Inspect other components in the immediate area for possible damage.

2. Immediately inform the Shift Supervisor of the location and magnitude of the leak(s) or boric acid residue.

3. Contact the Radiological Controls Supervisor to control the spread of contamination.

b. The Shift Supervisor, in turn, shall contact Systems Engineering to inspect the leak.

(Continued on page 10a)

6.2.5 When boric acid leakage or boric acid residues are detected during ASME Section XI pressure tests of the Reactor Coolant System, the person conducting the test shall: C-2

a. Inform the Shift Supervisor of the location and magnitude of the leak or residue.

b. Perform an initial inspection of attached areas and inform Systems Engineering of the location and magnitude of the leak or residue. C-2

6.3 Examination and Evaluation

6.3.1 Upon notification of boric acid build up in the Plant, Systems Engineering shall perform an initial inspection of the affected area, if not already performed, to determine the "as found" conditions and documenting the results using drawings, photographs, or other aids as appropriate. Steps with a "*" should be performed because they assist in determining if a boric acid corrosion concern exists. The remaining steps help identify the scope of the problem.

a. The total amount of boron deposits and the amount of boron on each component should be estimated. This may be to identify the build-up as a light film or an estimate of the weight and/or volume. Coordinate with RADCON before collecting any boron samples if this is determined to be appropriate.*

b. The area of the identified boron build-up should be inspected to verify that the boron is localized to the identified area. This should include a verification that a boron build-up is not located at an elevation above or below the identified area or on other near-by components. All components with a boron build-up should be identified. The area should also be inspected to determine if boric acid could have entered the internals of a component or the inside of insulation and spread internally to a location that is not visible and is susceptible to boric acid corrosion.* C-2

c. The affected areas should be inspected to identify any signs of corrosion. This will most likely be exhibited by red rust or red/brown stained boron. If corrosion is present, the amount of corrosion should be estimated. This should include an estimate of corrosion products present as well as an estimate of base metal removed.*

(Continued)

6.3.1 (Continued)

d. The affected components should be carefully inspected to determine if a boric acid solution is present or just crystals and residue. If active leakage is present a leak rate should be measured or estimated and then action taken to stop the leakage.*

e. The material that makes up affected components should be determined. Components that are fabricated of stainless steel or inconel do not require further evaluation. Carbon steel components can experience wastage rates up to one third inch per month under "ideal" conditions. Accelerated corrosions rates occur with temperatures near 200 degrees F and when an active leakage exists. Under these conditions, most of the water from the boric acid solution will attack the carbon steel. If the build up or corrosion is limited to valve handwheels or other extraneous appurtenances that do not affect component operability then the evaluation should be considered complete.* C-2

f. The temperature of the affected components should be determined for both existing conditions and for other conditions that the component may be subjected to. As an example, boron may be identified during a hydrostatic test conducted during refueling and the component is relatively cool but during power operation the component is subjected to high temperatures. Actual temperatures may be measured using installed instrumentation or a contact pyrometer. Temperatures may be estimated from previous log readings or vendor information.

g. The concentration of the boric acid solution in the system should be determined for both the existing conditions and for other condition the component may be subjected. This is most easily accomplished by a review of Chemistry Logs.

h. Identification of insulation of any other type of interference which must be removed to gain access to the leak.

i. Any preliminary preparations necessary for performing subsequent inspections.

6.3.2 System Engineering shall notify the Shift Supervisor of any immediate safety concerns raised by the initial inspection.

6.3.3 Based on the magnitude of the leak and extent of damage to the affected area, Systems Engineering shall document the inspections by one of the following:

a. Writing a Potential Condition Adverse to Quality (PCAQ) Report per NG-QA-00702, Potential Condition Adverse to Quality Reporting

b. Writing a Work Request per DB-PN-00007, Control of Work.

6.3.4 If boric acid residue is present, Systems Engineering shall contact Radiological Controls for cleanup of the affected area.

6.3.5 Systems Engineering shall determine whether follow-up or more detailed inspections of the leak are necessary to fully assess component damage and determine possible corrective action. C-2

NOTE: If the magnitude of the leak or the extent of the component damage is extreme, Systems Engineering may confer with Design Engineering before taking further action.

a. If a detailed inspection is deemed necessary, then Systems Engineering shall perform the following as required: C-2

1. Write service requests or work requests per DB-PN-00007, Control of Work, as necessary for the removal of any insulation, scaffolding, cables, or any other type of interference which prevents access to the leak.

2. Perform subsequent inspections of the affected component(s) as necessary and include the results with the initial inspection. These inspections should include: C-2

a) A detailed description of visible damage to the affected area. This description should include the presence of pitting or material wastage. If corrosion is present, then the depth of

pitting or wastage should be identified. This information is required for the analysis of component integrity.

b) Pictures of the affected area, if possible.

c) Identification of any other affected components not revealed in the initial inspection.

d) Any additional information regarding the leak source and leak path.

e) Determination of the leak rate, if possible.

f) Determining the root cause of the leak.

6.3.6 If a PCAQ was generated in step 6.3.3, then:

a. Systems Engineering shall forward the PCAQ to Design Engineering via the PCAQ Review Board and provide any additional system technical information as required.

b. Design Engineering shall perform the following:

1. Review the inspection report and request additional information from Systems Engineering as necessary to assess the leak.

2. Assess the extent of component damage.

C-2

3. Determine the component wall degradation rate.

NOTE: NUREG and EPRI Manuals, available in the Technical Library, contain helpful reference material for determining boric acid corrosion rates:

a. EPRI NP-5985, Boric Acid Corrosion of Carbon and Low Alloy Steel Pressure Boundary Components in PWRs

b. NUREG/CR-2827, Boric Acid Corrosion of Ferritic Reactor Components

c. NUREG-1095, Evaluation of Responses to IE Bulletin 82-02, Degradation of Threaded Fasteners in Reactor Coolant Pressure Boundary of Pressurized Water Reactor Plants.

4. Perform any necessary stress calculations for assessing continued pressure boundary integrity.

5. Determine the corrective action to be taken if repair or replacement are necessary to support continued service of the component. C-1

6. Determine the corrective actions to be taken to prevent recurrence of boric acid corrosion. These corrective actions should include consideration of plant design modifications and operating procedure modifications which would:

a. Reduce the probability of leaks at locations where they may cause corrosion damage. C-1

b. Entail the use of corrosion resistant materials or the application of protective coatings or claddings.

c. Redesign insulation layout that would permit draining or shunting of coolant leaks away from critical areas.

7.0 RECORDS

7.1 If the inspection report was documented as a PCAQ, it shall be processed by Nuclear Records Management as per NG-QA-00702, Potential Condition Adverse to Quality Reporting.

7.2 If the inspection report was documented as an MWO, it shall be processed by Nuclear Records Management as in DB-PN-00007, Control of Work.

7.3 The following non-quality assurance records are completed by this procedure and may be captured and submitted to Nuclear Records Management, in accordance with NG-IM-00106:

7.3.1 None

COMMITMENTS

Section	Reference	Comments
5.0	TERMS ID 014997	This procedure is being implemented in response to NRC Generic Letter 88-05, BORIC ACID CORROSION OF CARBON STEEL REACTOR PRESSURE BOUNDARY COMPONENTS IN PWR PLANTS.
All	TERMS ID 008404	C-2
1.1	TERMS ID 015041	

END