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Tennessee Valley Authority, Post Office Box 2000, Spring City, Tennessee 37381-2000

JUN 2 9 2006

10 CFR 50.4

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555-0001

Gentlemen:

In the Matter of Tennessee Valley Authority Docket No. 50-390

WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 - AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) INSERVICE INSPECTION (ISI) PROGRAM REQUEST FOR RELIEF 1-ISI-16, 1-ISI-17, 1-ISI-18, AND 1-ISI-19 - REQUEST FOR ADDITIONAL INFORMATION (TAC NOS. MC 9638, MC9639, MC9640, MC9641)

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The purpose of this letter is to provide a response to NRC's request for additional information dated April 27, 2006, concerning TVA's request for relief dated January 25, 2006.

The Enclosure provides TVA's response to NRC's questions. There are no regulatory commitments associated with this submittal. If you have any questions concerning this matter, please call me at (423) 365-1824.

Sincerely,

P. L. Pace Manager, Site Licensing and Industry Affairs

Enclosure Cc: See Page 2

U.S. Nuclear Regulatory Commission Page 2

JUN 2 9 2006

Enclosure cc (Enclosure): NRC Resident Inspector Watts Bar Nuclear Plant 1260 Nuclear Plant Road Spring City, Tennessee 37381 Mr. D. V. Pickett, Senior Project Manager U.S. Nuclear Regulatory Commission MS 08G9a One White Flint North 11555 Rockville Pike Rockville, Maryland 20852-2738

U.S. Nuclear Regulatory Commission Region II Sam Nunn Atlanta Federal Center 61 Forsyth St., SW, Suite 23T85 Atlanta, Georgia 30303

WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 REQUEST FOR RELIEF 1-ISI-16, 1-ISI-17, 1-ISI-18, AND 1-ISI-19

This letter provides TVA's response to NRC's request for additional information dated April 27, 2006, concerning TVA's Inservice Inspection Program requests for relief dated January 25, 2006. Below are the responses to NRC's questions:

RELIEF REQUEST 1-ISI-16:

NRC QUESTION 1

Are there any other welds, within the examination category, that can be examined that will provide essentially 100 percent coverage of the examination volume?

TVA RESPONSE

The risk informed segment which includes weld SIF-D092-15 is classified High Safety Significant. The postulated failure mechanisms for the segment include Stress Corrosion Cracking (SCC). All welds in this segment that are subject to SCC must be examined every ten years. Weld SIF-D092-15 is the only weld in this segment that is subject to SCC. Therefore, there are no other welds in this segment to substitute for SIF-D092-15.

NRC QUESTION 2

Please confirm that personnel performing the single-sided examination were Performance Demonstration Initiative-qualified, and provide the appropriate ASME Section XI, Appendix VIII supplement(s) to which they qualified.

TVA RESPONSE

TVA confirms that personnel performing the single-sided examination were Performance Demonstration Initiative (PDI) qualified. Copies of the individual qualified examiner's certifications are provided in Attachment 1. The appropriate ASME Section XI, Appendix VIII Supplement to which the examiners were qualified, are listed on the Certifications.

NRC QUESTION 3

Other than radiographic examination, what other volumetric techniques were considered to increase volumetric coverage, and why were they not pursued?

WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 REQUEST FOR RELIEF 1-ISI-16, 1-ISI-17, 1-ISI-18, AND 1-ISI-19

TVA RESPONSE

Currently, ASME Section XI lists three types of volumetric examination methods (Eddy Current, Radiography, and Ultrasonics). As required by ASME Section XI, and listed in the latest edition of the Electric Power Research Institute (EPRI) PDI qualified procedure, PDI-UT-2, "Generic Procedure for the Ultrasonic Examination of Austenitic Pipe Welds," Revision C, the required examination volume to be examined is basically the lower one third thickness of the weld for a distance of 1/4-inch from the toe of the weld.

In order to perform an adequate examination of the required volume utilizing the Eddy Current Examination Method, an extensive modification would be required to gain access to the inside diameter of the weld since the component is a Pipe to Tee weld configuration.

Although radiography could be utilized, it is a less sensitive examination in detecting flaws unless the radiographic beam passes thru the weld oriented along the same plane as the flaw, which may require several radiographic shots resulting in additional dosage to personnel.

As indicated above, the Appendix VIII qualified ultrasonic examination technique was developed to provide the best method for detecting flaws in the required examination volume, as required by Supplement 2 of ASME Code Section XI and mandated by 10 CFR 50.55a.

NRC QUESTION 4

What are the general area, contact, and 12" dose rates at weld SIF-D092-15?

TVA RESPONSE

Weld SIF-D092-15 is at the intersection of the 6-inch emergency core cooling system (ECCS) flow path with the 14-inch Residual Heat Removal (RHR) letdown line off of reactor coolant system (RCS) Loop 4 hotleg. The weld of the 6-inch elbow to the 14-inch x 14-inch x 6-inch Tee is just a few feet from the RCS piping.

No specific radiological survey was performed for this weld inspection activity. However, a pre-shielding survey of the hot legs on RCS Loops 1 and 4 was conducted just days before the weld

WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 REQUEST FOR RELIEF 1-ISI-16, 1-ISI-17, 1-ISI-18, AND 1-ISI-19

inspection. The results of the radiological survey were as follows:

General area	25 millirem per hour	(mrem/hr)
30 centimeters	35-40 mrem/hr	
Contact	80-100 mrem/hr	

These survey results are a good approximation of the dose rates at the weld location since the weld is only a few feet off of the RCS loop.

RELIEF REQUEST 1-ISI-17 AND 1-ISI-18:

NRC QUESTION 5

Provide an explanation of Actual Increment and Scan Positions in relation to the limitations of the weld scans.

TVA RESPONSE

The actual increment and scan positions indicate the specific start and stop position readouts indicated by the scanner for the raster scans. Depending upon the specific scanner axes used for incrementing and scanning, the readouts typically represent inches or degrees. These readouts allow the examiner to determine the length of the scan that was accomplished at each increment location, which is used to compute coverage obtained.

NRC QUESTION 6

Compare the limitations on coverage of welds W01-02, W02-03, W2A, W2B, W2C, W2D, W2E, and W2F, with the limitations from any previous scans of the welds, such as preservice inspections, and explain any areas of less coverage than on previous exams. Discuss the results of the comparison.

TVA RESPONSE

The Pre-Service Examination of the WBN reactor vessel was performed during October-November, 1978. The exams were performed to the requirements of Section V and Section XI of the ASME Boiler and Pressure Vessel Code, 1974 Edition through the Summer 1975 Addenda. In accordance with Paragraph I-5213 of Section XI, only the limitations were required to be listed on the examination report. The requirement to calculate the extent of coverage was not required until Regulatory Guide 1.150,

WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 REQUEST FOR RELIEF 1-ISI-16, 1-ISI-17, 1-ISI-18, AND 1-ISI-19

"Ultrasonic Testing of Reactor Vessel Welds during Pre-Service and Inservice Examinations," dated June 1981 was issued. The Pre-Service Examination was performed prior to issuance of this regulatory guide. As a result, the limitation of each component was recorded by the obstruction, and no coverage estimates of the volume were calculated.

As a result, a direct comparison of the extent of coverage cannot be accurately determined. The 2005 Inservice Inspection was performed to Appendix VIII qualified PDI guidelines which utilize qualified personnel and techniques as required by 10 CFR 50.55a and Section XI.

A listing of the reported coverage and limitations for the inservice inspection and limitations for the pre-service inspection is included in Attachment 2.

RELIEF REQUEST 1-ISI-19:

NRC QUESTION 7

Provide details showing ultrasonic beam angles used to find the two code allowable indications in weld-18 and the coverage obtained in the area of the flaws. Also, provide details showing the ultrasonic beam angles for any additional interrogation of these two code allowable indications in weld-18 and any additional coverage obtained in the area of the flaws.

TVA RESPONSE

The nozzle to vessel welds were examined with vendor PDI qualified procedures, and were scanned from the inside surface of the vessel and from the nozzle inside surface. The following information (listed in the vendor's final report) is described below.

• Nozzle to vessel weld from the inside surface of the vessel.

The inner 3.25 inches including the weld metal and adjacent metal for 1/2-inch beyond the weld fusion line was scanned with a module designed to generate 50 and 70 degree shear and longitudinal waves.

The weld metal and adjacent material in the outer volume beyond 3.25 inches was scanned with a module to generate 45 and 55 degree shear wave search units.

WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 REQUEST FOR RELIEF 1-ISI-16, 1-ISI-17, 1-ISI-18, AND 1-ISI-19

• Nozzle to vessel weld from the inside surface of the nozzle bore.

In order to achieve coverage through the examination volume, the nozzle to shell welds were examined from the nozzle bore using longitudinal wave beam angles ranging from 5 degrees to 40 degrees and shear wave beam angles from 35 degrees to 45 degrees.

The indications were located in the outer 85 percent of the vessel and were ultrasonically detected from the inside diameter of the nozzle bore using the phased array technique. The indications were subsequently sized using the vendor's PDI qualified phased array sizing procedure.

A nozzle sketch from the vendor examination report, which shows the beam angles utilized for the outlet nozzle to vessel scan is included in Attachment 3. This sketch identifies the transducer and scan direction performed during the inspection.

NRC QUESTION 8

Compare the two code allowable indications with the results of any previous examinations for weld-18 and discuss the results of the comparison.

TVA RESPONSE

As discussed in Question 7 above, the two code allowable indications were detected from the inside bore surface of the nozzle with a qualified vendor procedure using a Phased Array technique.

During the pre-service examination, there were no flaws detected. The examination was performed utilizing 10, 15, and 45 degree refracted longitudinal waves, and 41.5, 45, and 60 degree shear waves in accordance with ASME Section V and ASME Section XI.

The two code allowable indications were detected and sized using a PDI qualified technique, which was not available at the time of the pre-service inspection.

WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 REQUEST FOR RELIEF 1-ISI-16, 1-ISI-17, 1-ISI-18, AND 1-ISI-19

NRC QUESTION 9

Describe the outlet nozzle integral extension and how it restricts the ultrasonic search unit scan surface, thereby limiting the two-direction transverse coverage.

TVA RESPONSE

The sketch referenced in Question 7, (Attachment 3), shows a basic outline of the integral extension of the outlet nozzle. As seen in the sketch, the outlet nozzle extension extends outward from the inside surface of the nozzle. The height and radius of this design prevents the transducers from mating to the surface, thereby, preventing sound from passing from the transducer to the inside surface of the reactor vessel.

ENCLOSURE Attachment 1

WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 REQUEST FOR RELIEF 1-ISI-16, 1-ISI-17, 1-ISI-18, AND 1-ISI-19

EXAMINERS CERTIFICATIONS



Sonic Systems International

Sonic Systems

Visual Acuity Examination Record

Jason Polisensky 0009666

This vision acuity examination is in compliance with ANSI N45.2.6, NQA-1, ASNT SNT-TC-1A, ANSI/ASNT CP-189, and ASME Section XI 1992 with 1992 addenda and Later editions.

SSI Visual Acuity Examination Procedure No.

551-A-020 Rev. 02

Q.

Far Distance Acuity:		Far Vision	Snellen T	est
: Natural	•	🖌 Right 20/20		
 Corrected 		∠ Left 20/20		
	• • •	☑ Both 20/20		
Near Distance Acuity:	•. •	Near Vision	ASME XI Tes	t Card
Natural		K Right J1-20/2	5	1
		K. Left J1-20/25		}
Corrected		Mi Both J1-20/25		
Color Contrast Acuity:		· Normal	 Abnormal 	
'normal', where discrimination to the examiner. Comments:				
Vision acuity examination given by a	WGI Level III.	Documentation on file	<u></u>	· · · · · · · · · · · · · · · · · · ·
Vision doury endimination growing -				
				•
Eye Test Date		······		
Eye Test Expiration Date 8/24/2005				
Administered By	· · ·	Reviewed By	\sim	
For the	8/24/2004	Attel	end	8/24/2004
Michael Robbins WGI Level III	Date	Stephen K. Hubbard Le	vel III	Date



Sonic Systems International

Page 1 of 1

Sonic Systems

Certificate of Qualification *for* Jason Polisensky 0009666

This Individual is certified in accordance with Sonic Systems International Inc.'s Nondestructive Examination Qualification and Certification Program, which is in compliance with the applicable portions of ASNT SNT-TC-1A, CP-189 and ASME Section Xt.

SSI NDE Certification Procedure(s) No.

SSI-A-005 Rev. 20 ICN 01 for MT, PT & VT1,2,3; SSI-A-013 Rev. 1 for UT

CERTIFICATIONS

Method	Level	Certification Date	Recertification Date	Expiration Date
Liquid Penetrant	i ii	1/14/2004	N/A	1/12/2007
Magnetic Particle	1 11	1/14/2004	• N/A	1/12/2007
Ultrasonic	II-PDI	1/13/2004	N/A	1/13/2007
Visual VT-1	11.	1/14/2004	N/A	1/12/2007
Visual VT-2		1/14/2004	N/A	1/12/2007
Visual VT-3	tt	1/14/2004	N/A	1/12/2007

Limitations: None.

Test Techniques: MT: Indirect; PT: Color Contrast and Flourescent, Solvent Removable and Water Washable; UT: Contact; VT-1: VT-2: VT-3, Direct and Remote.

EYE EXAMS

Not valid without current eye exam attached,

ADDITIONAL CERTIFICATIONS / QUALIFICATIONS

Appendix VIII PDI Qualified for Detection In Feritic and Austenitic with IGSCC-Expires – Exp Date 10/24/2007 Appendix VIII PDI Qualified for Length Sizing for Ferritic and Austenitic with IGSCC- Expires - 10/24/2007

Q:r

Reviewed By Hills 2/1/05 Stephen K. Hubbard, Principal Level III Date



Qualification and Certification Summary Sonic Systems International

Name:		Jason Po	liconcl	v [.]		Bados	e: 0009	666				
						Daug						
METHOD			GENERAUBASIC SPEC.METHOD PRACT./SPEC		PRACT./SPEC. COMPOSIT			EXAMINER				
		SCORE	WT	SCORE	WT	SCORE	WT	SCORE		274 (11)		
AE			†									
ET		f										
MT	1	92.5	0.333	100	0.333	100	0.333	. 97.4		Slephen .K	Hubbard	
PT	11	95	0.333	90	0.333	100	0.333	94.9		Stephen K.	. Hubbard	
RŤ										•		
UT	II-POI	81.6	0.333	100	0.333	80	0.333	87.1		S.K. Hubbard	& EPRI POI	·
VT												
VT-1	11	81.7	0.333	93	0.333	100	0.333	91.5		Stephen K.		
VT-2	N N	81.7	0.333	93 .	0.333	100	0.333	91.5		Stephen K.	Hubbard	
VT-3	11	81.7	0.333	93	0.333	100	0.333	91.5	1	Stephen K.	Hubbard	
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Diplom RAININ CLS 28 12 4 80 80	IG LAB 12 24 41	Hours - M Hours - Li Hours - Li Hours - U Hours - Pl Hours - Sr	agnetic P quid Pen quid Pen lirasonic, DI, EPRI mart 2000	article, Ocea etrant, Ocea etrant, SSI Ocean Corp), GE Nuclea	an Corp. n Corp.	·.						
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The above Individual meets or exceeds the certification requirements as specified in Sonic System International. Inc.'s Qualification Program.

1/05 2



Individual Experience Summary Record Sonic Systems International

Documented records are maintained on file and meet at least the minimum Sonic Systems International requirements for each certification discipline. These and additional records (when referenced) provide objective evidence supporting Qualification and Certification.

File Date

Name: Jason Polisensky						Badge	: 0009	666						
Prior C	ertific	ation:												
Raytheon Longview DNV-199 GE UT Le LMTLevel	Levei 7 :vei li	-	91 MT				•. •	P	•			•		
		Documente	d Experience		AE	ET	MT	PT	RT	UT	VT	VT-1	VT-2	VT-3
	Date		Company	Level			11	11		II-PDI		1		ū
02/92	to	12/97	GE		0	0	0	0	0	4231	0	0	0	0
01/98	10	03/98	Longview	11	0	0	0	100	0	300	.0	•0	0	0
03/98	to	04/00	Raytheon	TRN	0	0	0	0	0	0	0	837	372	372
03/98	10	04/00	Raytheon	11	0	0	620	695	0	892	0	0	0	0
09/00	10	10/00	LMT	1	0	0	113	100	0	79	0	0	0	0.
10/01	to	04/04	SSI		0	0	424	333	0	944	110	168	165	169
			perience		0	0	1157	1228	0	6446	110	1005	537	541

The supporting documented records have been reviewed and are true and correct to the best of my knowledge.

2/1/05 Date

Stephen K. Hubbard, Principal Level III



Sonic Systems International, Inc. The Nuclear Refueling and Inspection Specialists

1880 Dairy Ashford Suite 207 Houston, Texas 77077 (281) 531-7611

ASME XI Appendix VIII Hands-on-Practice (8 Hours) Documentation

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Candidate Name: Jason Polisensky

Date: October 24, 2004

SS#/1D#: 0009666

Mr. Polisensky successfully completed qualification for Detection and Length Sizing for Feritic and Austenitic, PDI-UT-1 and PDI-UT-2 with IGSCC at the EPRI NDE Center on October 24, 2004.

Due Date: May 24, 2005



ASME Section XI -Appendix VII Annual Training

Topics Covered:

- A. Review of ASME Section XI, Appendix VII, 1995 Edition
- B. Review of ASME Section XI, Appendix VIII Supplement Identification
- C. Feasibility of Ultrasonic Examination of Dissimilar Metal Welds
 - PDI Presentation by Carl Latiolais & Jeff Landrum, EPRI NDE Center April 22, 2002
- D. Status of the PDI Dissimilar Metal Weld Program
 - a. PDI Presentation by Carl Latiolais, EPRI NDE Center, April 12, 2002
- E. Dissimilar Metal Welds Program Issues
 - a. PDI Presentation by Carl Latiolais, EPRI NDE Center, December 17, 2002
- F. PDI Generic Procedure for the Ultrasonic Examination of Dissimilar Metal Piping Welds; PDI-UT-10, Rev. A 12/20/2002
 - a. This procedure has been qualified at the EPRI NDE Center

<u>; </u>	Name			SSN	 D	ate
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NDE Instructor Michael Kohbere

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Sonic Systems International, Inc. The Nuclear Refueling and Inspection Specialists 1880 Dairy Ashford Suite 207 Houston, Texas 77077 (281) 531-7611

ASME XI Appendix VII Annual Training (10 Hours) Documentation

Candidate Name: Jason Polisensky

Completion Date: 08/25/2004

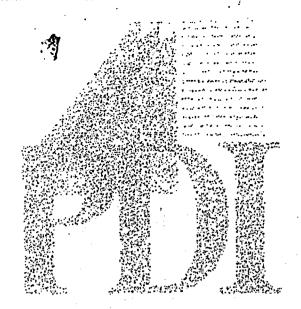
ID#: 0009666

Mr. Polisensky received 10 hours of Annual Training from the Washington Group on August 25, 2004. I have reviewed the documentation signed by a Washington Group Level III Instructor. I accept this training as meets the Annual Training requirements outlined in SSI-A-013 Rev. 02.

Retraining due date: 08/25/2005

Approved:

Stephen K. Hubbard Level III / Instructor



Performance Demonstration Initiative Program

In Accordance with the PDI Implementation of Section XI, Appendix VIII

IGSCC Requalification Signature Sheet

Candidate : Polisensky Jason

Original Procedure : PDI-UT-2 vBa0

(Limitations and Comments listed on original PDQS still apply)

Corl Catiolais Date 91 8 12004

Performance Demonstration Initative Piping and Bolting Supervisor/Level III

Date <u>91812004</u> L. Becker

Performance Demonstration Initative Administrator

Page 2 of 2

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Performance Demonstration Initiative Program

In Accordance with the PDI Implementation of Section XI, Appendix VIII

IGSCC Requalification Summary Sheet

Candidate : Polisensky Jason

Original Procedure : PDI-UT-2 vBa0

(Limitations and Comments listed on original PDQS still apply)

Revision	Addenda		Requal Date	Application	Exam Type	Access
C	0		07/05/2004	Piping Manua	I Detection	Single
Ċ	0	·. ·	07/05/2004	Piping Manua	d Detection	Dual



Performance Demonstration Initiative Program In Accordance with the PDI Implementation of Section XI, Appendix VIII Printed: 17-Nov-04 PDQS No: 448 04061103

Specific Detail of Qualifications

Procedure: PDI-UT-2; Revision: C; Addenda: 0

Candidate: Jason Polisensky

ID#: 격

PDI Generic Procedure for the Ultrasonic Examination of Austenitic Pipe Welds

PDQS Rev: 0 Owner: Performance Demonstration Initiative Hardware: N/A Category: Piping

Date of Issue:	17-Nov-04
Analysis SW Type/Rev:	N/A
Operator SW Type/Rev:	N/A
Scan Application:	Manual

The above candidate has met the requirements of The Performance Demonstration Initiative's Implementation of The American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, Appendix VIII, as stated in this document.

for Carl Latiolais. Carl L. Latiolals

Date: 11/17/04

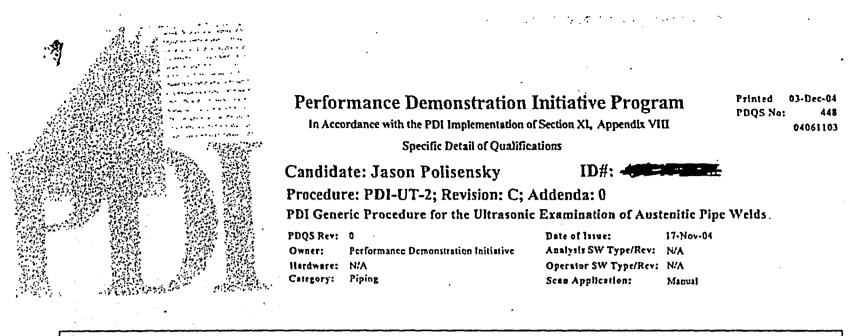
Performance Demonstration Initiative Piping and Bolting Supervisor/Level III

Beck · F. L. Becker

Date: 1/

Performance Demonstration Initiative Administrator

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When "Length Sizing" is indicated, the 0.750 RMS acceptance criteria per the PDI Program Description has been achieved. When "Through Wall Sizing" is indicated, the 0.125 RMS acceptance criteria per the PDI Program Description has been achieved.

Tolerances for field applications as follows:

Diameter:

Lower: .500" can be subtacted from the minimum diameter demonstrated.

Upper: Diameters greater than 24" need not be demonstrated.

Thickness:

Lower: 0.100° can be subtracted from the minimum thickness demonstrated for both austenitic and ferritic

Upper: 1.000" can be added to the maximum thickness demonstrated for ferrific material.

"0.500" can be added to the maximum thickness demonstrated for austenitic material.

This candidate has met the practical requirements of Appendix VII: Yes

Comments:

Limitations: 1 This procedure/candidate is not qualified to detect axially orientated flaw's located on the far side of the weld where access is limited to one side and the ultrasonic beam is required to propagate through austenitic weld material.

2 The austentitic single side qualifications, documented on this summary, demonstrate application of best available technology, but do not meet the requirements of 10CFR 50.55x(b)(2) (avi) (B).



Performance Demonstration Initiative Program

In Accordance with the PDI Implementation of Section XI. Appendix VIII Specific Detail of Qualifications

Candidate: Jason Polisensky

ID#; -

Printed:

PDQS No:

17-Nov-04

04061103

448

Procedure: PDI-UT-2; Revision: C; Addenda: 0

PDI Generic Procedure for the Ultrasonic Examination of Austenitic Pipe Welds

PDQS Rev: 0 Owner: Performance Demonstration initiative Hardware: N/A Category: Pipag Date of Issue: 17-Nnv-(4 Analysis SW Type/Rev: N/A Operator SW Type/Rev: N/A Scan Application: Manual

Ranges Demonstrated:

	• .	· ·		•	
Date: 25-Oc	1-04				
MinDiam:	2.000	Min	Thick:	0.237	
MaxDiam:	36.000	Max	Thick:	2,900	
Material:	Austo	enitic	with IGSCC.		
Examin	ation: 1	Detect	ion		
54	cess:	: De	nuble Sided		
	Weld Co.	nd:	Ground Fl	ush	
	Weld Co	nd:	Flat Top		
Ι.	Weld Co	nd:	As Welde	đ	
.Ar	cess:	Si	ngle Sided		
l	Weld Co	nd:	Ground F	lush	
	Weld Co	nd:	Flat Top		
	Weld Co	nel:	As Welde	đ	



Performance Demonstration Initiative Program

In Accordance with the PDI Implementation of Section XI, Appendix VIII Specific Detail of Qualifications

Candidate: Jason Polisensky

ID#: =

l'rinted;

PDQS No:

17-Nov-04

04061103

448

Procedure: PDI-UT-1; Revision: C; Addenda: 0

PDI Generic Procedure for the Ultrasonic Examination of Ferritic Pipe Welds

PDQS Rev: 0 Owner: Performance Demonstration Initiative Hardware: N/A Category: Piping
 Date of Issue:
 17-Nov-04

 Analysis SW Type/Rev:
 N/A

 Operator SW Type/Rev:
 N/A

 Scan Application:
 Manual

The above candidate has met the requirements of The Performance Demonstration Initiative's Implementation of The American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, Appendix VIII, as stated in this document.

for Carl Lafiolais

Date: 11/17/04

Carl L. Latiolais Performance Demonstration Initiative Piping and Bolting Supervisor/Level III

Beck F. L. Becker

Performance Demonstration Initiative Administrator

Date: 11-17-04

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	Performance Demonstration In Accordance with the PDI Implementation Specific Detail of Qual	m of Section XI, Appendix Vi	1.11/23 1.101	17-Nov-04 448 04061103	
	Candidate: Jason Polisensky	ID#: 48			
	Procedure: PDI-UT-1; Revision: C	; Addenda: 0			
	PDI Generic Procedure for the Ultrason	ic Examination of Ferritic	Pipe Welds		
	PDQS Rev: 0 Owner: Performance Demonstration Initiative Hardware: NA Category: Piping	Apalysis SW Type/Rev: N Operator SW Type/Rev: N	l-Nov-C4 IA IA Ianual		
	RMS acceptance criteria per the PDI Program Description has been a c 0.125 RMS acceptance criteria per the PDI Program Description has		· ····	•	
Tolerances for field applications as follows				· · · · · · · · · · · · · · · · · · ·	
Diameter: Lower: .500" can be subracted from t	h minimum diamatan dan seconda	•		•	
Lower, 1900 can be subfacted from t				:	
Upper: Diameters greater than 24" no					
Thickness:					
Thickness: Lower: 0.100° can be subtracted from	the minimum thickness demonstrated for both austenitic and ferrific eximum thickness demonstrated for ferrific material.	• •			

Comments:

Limitations: 1 This procedure candidate is only qualified to length size flaws orientated in the circumferential direction.

Page 2 of 3

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Performance Demonstration Initiative Program

In Accordance with the PDI Implementation of Section XI, Appendix VIII

Printed: 17-Nov-04 PDQS No: 448 04067103

Specific Detail of Qualifications

Candidate: Jason Polisensky

ID#:

Procedure: PDI-UT-1; Revision: C; Addenda: 0

PDI Generic Procedure for the Ultrasonic Examination of Ferritic Pipe Welds

 PDQS Rev:
 0

 Owner:
 Performance Demonstration Initiative

 Hardware:
 N'A

 Category:
 Piping

Date of Issue: 17-Nov-04 Aualysis SW Type/Rev: N/A Operator SW Type/Rev: N/A Scan Application: Manual

Ranges Demonstrated:

Date: 25-Oct-04 MinDiam: 4.000 MinThick: 0.337 MaxDiam: 50.000 MaxThick: 3850 -----Material: Ferritic Examination: Detection Double Sided Access: **Ground Flush** Weld Cond: Weld Cond: Flat Top Weld Cond: As Welded Single Sided Access: . Ground Flush Weld Coud: Weld Cond: Flat Top Weld Cond: As Welded

Page 1 of 3

ENCLOSURE Attachment 2

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WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 REQUEST FOR RELIEF 1-ISI-16, 1-ISI-17, 1-ISI-18, AND 1-ISI-19

LIST OF LIMITATIONS

WBN RAI QUESTION #6 PRE-SERVICE VS ISI RPV EXAMINATIONS COVERAGE OF REQUESTED WELDS

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ISI Weld #	% Coverage	Restrictions listed in ISI Report	% Coverage	Restrictions listed in Pre-Service Report
	,			No Examinations from the cap side due to
W01-02	60%	Limited to bottom head penetrations	None Performed	instrumentation tue interference
		Limited due to proximity of core barrel		Limited Examination due to core support lug
W02-03	72%	stabilizing lugs	None Performed	interference.
		Limited due to the bottom head		
		penetrations and core barrel	and the second sec	Limited examination due to core support lug
W2A	79%	stabilizing lugs	None Performed	intereference.
		Limited due to the bottom head		
		penetrations and core barrel		Limited examination due to core support lug and
W2B	84%	stabilizing lugs	None Performed	instrumenation tube intereference.
	[Limited due to the bottom head		
		penetrations and core barrel	ļ	Limited examination due to core support lug and
W2C	85%	stabilizing lugs	None Performed	instrumenation tube intereference.
	· · · · · · · · · · · · · · · · · · ·	Limited due to the bottom head		
	Į	penetrations and core barrel		Limited Examination due to core support lug
W2D	85%	stabilizing lugs	None Performed	interference.
	· · · · · ·	Limited due to the bottom head		
	1	penetrations and core barrel		Limited examination due to core support lug and
W2E	85%	stabilizing lugs	None Performed	instrumenation tube intereference.
	1	Limited due to the bottom head		
	1	penetrations and core barrel		Limited examination due to core support lug and
W2F	67%	stabilizing lugs	None Performed	instrumenation tube intereference.

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ENCLOSURE Attachment 3

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WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 REQUEST FOR RELIEF 1-ISI-16, 1-ISI-17, 1-ISI-18, AND 1-ISI-19

VENDOR'S NOZZLE SKETCH

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