VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

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VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)
SURRY POWER STATION UNITS 1 AND 2
NORTH ANNA POWER STATION UNITS 1 AND 2
REQUEST TO USE PORTION OF LATER EDITION
AND ADDENDA OF ASME SECTION XI

Currently North Anna and Surry Power Stations Units 1 and 2 are completing their first ten-year Containment Inservice Inspection (ISI) Interval using the 1992 Edition with the 1992 Addenda of ASME Section XI (Code). The IWE portion of the Containment ISI Plan is currently in the 3rd period for all four units. The Code allowed period/interval extension requirements of IWA-2430(d) and IWE-2412(b) have been applied coinciding with planned outages such that the 3rd period end dates for the Containment ISI (IWE) Plan are as follows:

North Anna Unit 1 - 10/06/2007
North Anna Unit 2 - 10/11/2008
Surry Unit 1 - 11/21/2007
Surry Unit 2 - 05/21/2008

10CFR50.55a(b) currently endorses the 2001 Edition through the 2003 Addenda of ASME Section XI. Pursuant to 10 CFR 50.55a(g)(4)(iv), Dominion requests approval to use the 2001 Edition through the 2003 Addenda of ASME Section XI, Subsection IWE, Table IWE-2500-1, Category E-A, Item number E1.12. The use of Item E1.12 is requested to clarify VT-3 examination methods for the IWE containment surfaces.

NRC Regulatory Issue Summary 2004-12, "Clarification on Later Use of Editions and Addenda to the ASME OM Code and Section XI," notes that if licensees choose to use only portions of the later Code, then they must meet all related requirements of the respective editions and addenda as well. Therefore, a discussion of the related Code requirements and how they will be implemented by Dominion is provided in Attachments 1, 2, and 3.

Dominion requests approval to use the above mentioned Edition and Addenda of ASME Section XI by May 31, 2007 to support implementation of the alternate Code requirements during the Surry Unit 1 and North Anna Unit 1 fall 2007 refueling outages. A decision in processing this request by the requested date provides adequate time to obtain and qualify the remote visual VT-3 examination procedure and equipment for implementation of the current code requirements.

If you have any questions or require additional information, please contact Mr. Thomas Shaub at (804) 273-2763.

Very truly yours,

Gerald T. Bischof
Vice President – Nuclear Engineering

Attachments

1. Comparison of and Compliance with ASME Code Requirements
2. Comparison of Code Requirements for IWA-2200 and IWE-3510 VT-3 Examination
3. Comparison of Code Requirements for IWA 2300 VT-3 Examiner Qualification/Certification

Commitments made in this letter: None

cc:

U.S. Nuclear Regulatory Commission
Region II
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Suite 23T85
Atlanta, Georgia 303035

Mr. N. P. Garrett
NRC Senior Resident Inspector
Surry Power Station

Mr. J. T. Reece
NRC Senior Resident Inspector
North Anna Power Station

Mr. S. R. Monarque
NRC Project Manager – North Anna Power Station
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Mail Stop 8-H12
Rockville, Maryland 20852-2738

Mr. S. P. Lingam
NRC Project Manager – Surry Power Station
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Mail Stop 8 G9A
Rockville, Maryland 20852-2738

Mr. R. A. Smith
Authorized Nuclear Insurance Inspector
Surry Power Station

Mr. M. Grace
Authorized Nuclear Insurance Inspector
North Anna Power Station

ATTACHMENT 1

COMPARISON OF AND COMPLIANCE WITH ASME CODE REQUIREMENTS

NORTH ANNA AND SURRY POWER STATIONS UNITS 1 AND 2
VIRGINIA ELECTRIC AND POWER COMPANY
(DOMINION)

COMPARISON OF AND COMPLIANCE WITH ASME CODE REQUIREMENTS NORTH ANNA AND SURRY POWER STATIONS UNITS 1 AND 2

Introduction

North Anna and Surry Units 1 and 2 are in the 3rd period of the first ten-year Containment Inservice Inspection (ISI) Interval for ASME Section XI Subsection IWE. Pursuant to 10CFR50.55a(g)(4)(iv), Dominion requests approval to use a portion of later editions and addenda of ASME Section XI, specifically the 2001 Edition through the 2003 Addenda, Subsection IWE, Table IWE-2500-1, Category E-A, Item number E1.12. The use of Item E1.12 is requested to clarify where the VT-3 examination method is intended to be performed (i.e., wetted surfaces of submerged areas) for the IWE containment surfaces requiring examination.

The 2001 Edition through the 2003 Addenda of ASME Section XI Code limits parts (surfaces) to be examined for Item E1.12 to wetted surfaces of submerged areas. The 1992 Edition with the 1992 Addenda of ASME Section XI requires examination of accessible surface areas similar to Item number E1.11 of the 1992 Edition with the 1992 Addenda ASME Section XI Code. The wetted surfaces of submerged areas was only part of the examination requirement in the 1992 Edition with the 1992 addenda of the ASME Code.

ASME Code Components Affected

The North Anna and Surry containments are sub-atmospheric. The metallic liner of the concrete containment is examined under the rules of ASME Section XI, IWE (metallic liners of Class CC components). The components affected are the containment surface areas of the liner as addressed by Table IWE-2500-1, Category E-A, Item number E1.12.

The 1992 Edition with 1992 Addenda Item E1.12 – includes all accessible surface areas of the metallic liner including wetted surface areas of submerged areas.

The 2001 Edition through 2003 Addenda Item E1.12 – includes only the metallic liner wetted surface areas of submerged areas.

Applicable Code Edition and Addenda

The first ten-year Containment Inservice Inspection Plan for IWE for the North Anna and Surry units is based upon the 1992 Edition with the 1992 Addenda of ASME Section XI. The 1992 Edition with the 1992 Addenda of ASME Section XI, Subsection IWE, Table 2500-1, Category E-A, Item number E1.12, requires a 100% visual, VT-3 examination of the accessible surface areas. The parts (surfaces) to be examined include the following

notes associated with the item number.

(2) Examination shall include structures that are parts of reinforcing structure, such as stiffening rings, manhole frames, and reinforcement around openings.
(4) Including the wetted surfaces of submerged areas and the portions of insulated surface areas that are necessary to meet the requirements of IWE-1231(a)(4).
(5) Examination shall include the attachment welds between structural attachments and pressure retaining boundary or reinforcing structure, except for nonstructural and temporary attachments as defined in NE-4435 and minor permanent attachments as defined in CC-4543.4. Examination shall include the weld metal and the base metal for ½ in. beyond the edge of the weld.

The VT-3 examination is required once at the end of the interval. Note 1 was applicable to the examination requirement.

(1) Examination may be made from either the inside or outside surface.

Proposed Subsequent Code Edition and Addenda

The 2001 Edition through the 2003 Addenda of ASME Section XI, Subsection IWE, Table 2500-1, Category E-A, Item number E1.12, requires a 100% general visual of the wetted surfaces of submerged areas. The following note applied to the examination requirement.

(1) Examination shall include all accessible interior and exterior surfaces of Class MC components, parts, and appurtenances, and metallic shell and penetration liners of Class CC components. The following items shall be considered for examination:

(a) integral attachments and structures that are parts of reinforcing structure, such as stiffening rings, manhole frames, and reinforcement around openings.
(b) surfaces of attachment welds between structural attachments and pressure retaining boundary or reinforcing structure, except for nonstructural and temporary attachments as defined in NE-4435 and minor permanent attachments as defined in CC-4543.4.
(c) surfaces of containment structural and pressure boundary welds, including longitudinal welds (Category A), circumferential welds (Category B), flange welds (Category C), and nozzle-to-shell welds (Category D) as defined in NE-3351 for Class MC and CC-3840 for Class CC; and surfaces flued head and bellows seal circumferential welds joined to the penetration.
(d) Pressure-retaining bolted connections, including bolts, studs, nuts,

bushings, washers, and threads in base material and flange ligaments between fastener holes. Bolted connections need not be disassembled for performance of examinations, and bolting may remain in place under tension.

The general visual examination is required once an interval and deferral of the inspection to the end of the interval is permissible.

10 CFR50.55a(b)(2)(ix) modified the use of the 2001 Edition through the 2003 Addenda with limitations. The following limitations are applicable; paragraphs (b)(2)(ix)(A), (b)(2)(ix)(B), and (b)(2)(ix)(F) through (b)(2)(ix)(I). These are discussed.

(A) For Class MC applications, the licensee shall evaluate the acceptability of inaccessible areas when conditions exist in accessible areas that could indicate the presence of or result in degradation to such inaccessible areas. For each inaccessible area identified, the licensee shall provide the following in the ISI Summary Report as required by IWA-6000:
1) A description of the type and estimated extent of degradation, and the conditions that led to the degradation;
2) An evaluation of each area, and the result of the evaluation, and;
3) A description of necessary corrective actions.
- Dominion comment: The limitation also applies to the current 1992 Edition with the 1992 Addenda, no change.

(B) When performing remotely the visual examinations required by Subsection IWE, the maximum direct examination distance specified in Table IWA-2210-1 may be extended and the minimum illumination requirements specified in Table IWA-2210-1 may be decreased provided that the conditions or indications for which the visual examination is performed can be detected at the chosen distance and illumination.
- Dominion comment: The limitation also applies to the current 1992 Edition with the 1992 Addenda, no change.

(F) VT-1 and VT-3 examinations must be conducted in accordance with IWA-2200. Personnel conducting examinations in accordance with the VT-1 or VT-3 examination method shall be qualified in accordance with IWA-2300. The "owner-defined" personnel qualification provisions in IWE-2330(a) for personnel that conduct VT-1 and VT-3 examinations are not approved for use.
- Dominion comment: Dominion performs its VT-1 and VT-3 examinations in accordance with IWA-2200, and performs its VT-1 and VT-3 personnel qualification in accordance with IWA-2300.

(G) The VT-3 examination method must be used to conduct the examinations in items E1.12 and E1.20 of Table IWE-2500-1, and the VT-1 examination method must be used to conduct the examination in Item 4.11 of Table-2500-1. An examination of the pressure-retaining bolted connections in Item E1.11

of Table IWE-2500-1 using the VT-3 examination method must be conducted once each interval. The "owner-defined" visual examination provisions in IWE-2310(a) are not approved for use for VT-1 and VT-3 examinations.

- Dominion comment: For Item E1.12 the limitation requires that the VT-3 examination method be used instead of a general visual examination. Dominion will perform this examination using the visual VT-3 method using the examination provisions of IWA-2200.

(H) Limitation (bolting examinations per Item E1.11 while disassembled) does not apply to Item E1.12.

(I) Limitation (ultrasonic examination acceptance criteria of IWE-3511.3) does not apply to Item E1.12.

The 2001 Edition through the 2003 Addenda Table IWE-2500-1, Category E-A, Item E1.12 with applicable notes, is proposed for use with the required 10 CFR 50.55a(b)(2)(ix) limitations noted above.

Implementation of Related Requirements

Table 2500-1, Category E-A, Item number E1.12 as modified by 10 CFR 50.55a(b)(2)(ix)(F) and (G) are the related sections of the requested portion of the 2001 Edition through the 2003 Addenda of ASME Section XI.

The provisions of 10CFR50.55a(b)(2)(ix)(G) requires that a VT-3 examination be performed for Item number E1.12, when using the 2001 Edition through the 2003 Addenda of ASME Section XI. Additionally, the provisions of IWA-2200 and IWA-2300 shall be used for the VT-3 examination method and examiner qualification as opposed to any "owner-defined" program per 10CFR50.55a(b)(2)(ix)(F) and (G). These limitations for implementation of the ASME Section XI Code would be complied with. The following clarification of Dominion's VT-3 examination and qualification procedures are provided.

1) The North Anna and Surry VT-3 examination procedure for Category E-A, Item number E1.12 is based upon IWA-2200 and the acceptance criteria of IWE-3510 of the 1992 Edition with the 1992 Addenda of ASME Section XI. The examination requirements are essentially the same. Some of the later Code edition requirements are already incorporated in the Dominion VT-3 procedure, if more conservative. As such, the VT-3 examination procedure will not be modified due to this request. (Attachment 2 provides a comparison of the applicable code requirements found in IWA-2200 and IWE-3510 associated with the VT-3 examination, and provides an assessment of the Dominion procedure requirements.)

2) The written practice for North Anna and Surry VT-3 examination personnel qualification was previously updated by approved request to the requirements of

IWA-2300 in the 1998 Edition through the 2000 Addenda of ASME Section XI. These requirements are essentially the same as the requested 2001 Edition through the 2003 Addenda of ASME Section XI. As such, the written practice for the VT-3 examination method will not be modified due to this request. (Attachment 3 provides the differences in the applicable code requirements found in IWA-2300 associated with VT-3 examiner qualification/certification.)

All other provisions of the 1992 Edition with the 1992 Addenda of ASME Section XI as modified by approved relief request in the Containment ISI Plan remain in affect for the first ten-year Containment ISI Interval.

Duration of Proposed Request

Approval is requested for the first Containment ISI (IWE) ten-year interval for North Anna Units 1 and 2 and Surry Units 1 and 2.

ATTACHMENT 2

COMPARISON OF CODE REQUIREMENTS FOR IWA-2200 AND IWE-3510 VT-3 EXAMINATION

NORTH ANNA AND SURRY POWER STATIONS UNITS 1 AND 2 VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)

Comparison of Code Requirements for IWA-2200 and IWE-3510 VT-3 Examination
(1992 Edition with the 1992 Addenda vs. 2001 Edition through the 2003 Addenda of ASME Section XI)

Code Paragraph	1992e with 1992a	2001e through 2003a	Noted differences	Comments
IWA-2200(a)	The three types of examinations used during inservice inspection are defined as visual, surface, and volumetric. The examination method to be used is specified in Tables IWB-, IWC- , IWD-, IWE-, IWF-, and IWL-2500-1. If a component must be examined in a high radiation area, remotely controlled equipment may be advisable.	Same	None	Note: 2003a IWA-2200 corrected by erratum 12/03 No issue
IWA-2200(b)	When preparation of a surface for nondestructive examination is required, the preparation shall be by mechanical method. Such surfaces shall be blended into the surrounding area as may be required to perform the examination. The wall thickness shall not be reduced below the minimum thickness required by design. Non-mandatory Appendix D may be used for such surface preparation.	Same	None	No issue

Code Paragraph	1992e with 1992a	2001e through 2003a	Noted differences	Comments
IWA-2210(a) (b) (c) (d) (e)	Visual examinations shall be conducted in accordance with Article 9 of Section V and the following. **[a]** A written procedure and report of examination results is required. **[b]** For procedure demonstration, a near-distance vision chart containing text with lower case characters without ascender or descender (e.g., a, c, e, o) meeting Table IWA-2210-1 is required. Measurements of the near-distance test chart shall be made once before initial use with an optical comparator (10X or greater) or other suitable instrument to verify that the height, of a representative lower case character, for the selected type size, meets the requirements of Table-2210-1. **[c]** Remote examination may be substituted for direct examination. The remote examination procedure shall be demonstrated to resolve the selected test chart characters.	Intro is the same essentially (a) is the same (b) For procedure demonstration, a test chart containing text with some lower case characters without an ascender or descender (e.g., a, c, e, o) meeting Table IWA-2210-1 is required. Measurements of the test chart shall be made once before initial use with an optical comparator (10X or greater) or other suitable instrument to verify that the height of a representative lower case character without an asceder or descender, for the selected type size, meets the requirements of table IWA-2210-1. (c) is the same	The 1992e with the 1992a did not have subparagraphs (a), (b), (c), (d) or (e) (a) None (b) The later code substituted a generic test chart for a more specific near-distance vision chart. Some minor wording differences also noted. (c) None	Subparagraphs (a), (b), (c), (d), and (e) added to 1992e with 1992a IWA-2210 to facilitate comparison by Dominion (a) No issue (b) No issue (c) No issue

Code Paragraph	1992e with 1992a	2001e through 2003a	Noted differences	Comments
	[d] Alternatives to the direct visual examination distance requirements of Section V may be used as specified in Table IWA-2210-1. **[e]** It is not necessary to measure illumination levels on each examination surface when the same portable light source or similar installed lighting equipment is demonstrated to provide the specified illumination at the maximum examination distance. **[f]** The illumination levels from battery powered portable lights shall be checked before and after each examination or series of examinations, not to exceed 4 hours between checks.	(d) is the same (e) It is not necessary to measure illumination levels on each examination surface when the same portable light source or similar installed lighting equipment is demonstrated to provide the illumination specified in Table-2210-1 at the maximum examination distance. (f) The adequacy of illumination levels from battery powered portable lights shall be checked before and after each examination or series of examinations, not to exceed 4 hr between checks. In lieu of using a light meter, these checks may be made by verifying that the illumination is adequate (i.e., no discernable degradation in the visual examination resolution of the procedure demonstration test chart characters).	(d) None (e) The later code added a specific reference to Table-2210-1 (f) The later code added an alternative to the light meter requirements.	(d) No issue (e) The Table was implied in the previous code and results in no change to Dominion's procedure. (f) The addition to the later code incorporates Inquiry XI-1-01-07, which Dominion uses already in the examination procedure. No change.

Code Paragraph	1992e with 1992a	2001e through 2003a	Noted differences	Comments
IWA-2213	VT-3 examinations are conducted to determine the general mechanical and structural condition of components and their supports by verifying parameters such as clearances, settings, and physical displacements; and to detect discontinuities and imperfections, such as loss of integrity at bolted or welded connections, loose or missing parts, debris, corrosion, wear, or erosion. VT-3 includes examinations for conditions that could affect operability or functional adequacy of snubbers and constant load and spring type supports.	Same	None	No issue
IWA-2215	Surface replication methods may be used for VT-1 and VT-3 examinations when the surface resolution is at least equivalent to that of direct visual observation.	Same	None	No issue
IWA-2216	No paragraph	In addition to the requirements of Section V, Article 9, when remote visual examination is substituted for direct visual examination, the	The later code added remote visual requirements.	The Dominion visual procedure for VT-3 provides

Code Paragraph	1992e with 1992a	2001e through 2003a	Noted differences	Comments
		remote visual examination system shall have the capability of distinguishing and differentiating between the colors applicable to the requirements of VT-1 and VT-3 for the component examinations being conducted.		requirements that meet Section V, Article 9 and requires that the remote visual examination system have the capability of distinguishing and differentiating between the colors applicable to the requirements of VT-3 for the component examinations being conducted. The procedure has already incorporated the later requirements. No issue.

Code Paragraph	1992e with 1992a	2001e through 2003a	Noted differences	Comments
Table IWA-2210-1	VT-3 50fc 4ft 0.105in. (visual method, minimum illumination, maximum direct examination distance, maximum procedure demonstration lower case character height)	Same, except for metric values and the following note. (1) Resolution of the specified characters can be used in lieu of illumination measurement to verify illumination adequacy.	Later code added metric values, and note associated with resolution of characters can be used in lieu of illumination measurement.	No issue, Dominion has incorporated inquiry, XI-1-01-07 into the examination procedure, which meets the same illumination requirements provided in the note.
IWE-3510.2	**Coated** The inspected area, when painted or coated, shall be examined for evidence of flaking, blistering, peeling, discoloration, and other signs of distress. Areas that are suspect shall be accepted by engineering evaluation or corrected by repair or replacement in accordance with IWE-3122. Supplemental examinations in accordance with IWE-3200 shall be performed when specified as a result of the	**Coated and Uncoated** The condition of the inspected area is acceptable if there is no evidence of damage or degradation, which exceeds the visual examination acceptance criteria specified by the Owner. Areas that are suspect shall be accepted by engineering evaluation or corrected by repair/replacement activities or by corrective measures in accordance with IWE-3122. Supplemental examinations in accordance with IWE-3200 shall	The earlier code only addressed coated areas in IWE-3510.2. The later code had combined non-coated and coated in IWE-3510.2. The later code also allows the owner to develop the visual examination	The Dominion VT-3 examination procedure follows the earlier code requirements. Dominion's procedure meets this requirement for the earlier VT-3 acceptance criteria.

Code Paragraph	1992e with 1992a	2001e through 2003a	Noted differences	Comments
	engineering evaluation.	be performed when specified as a result of the engineering evaluation.	acceptance criteria.	
IWE-3510.3	**Uncoated** The inspected area shall be examined for evidence of cracking, discoloration, wear, pitting, excessive corrosion, arc strikes, gouges, surface discontinuities, dents, and other signs of surface irregularities. Areas that are suspect shall be accepted by engineering evaluation or corrected by repair or replacement in accordance with IWE-3122. Supplemental examinations in accordance with IWE-3200 shall be performed when specified as a result of the engineering evaluation.	**Bolting** Except for loose bolting, bolting materials with conditions that cause the bolted connection to violate either the containment leak-tight or structural integrity shall be corrected by repair/replacement activities. Loose bolting shall be corrected by corrective measures.	The earlier code addressed the non-coated area acceptance criteria. The later code now addresses pressure retaining bolting acceptance criteria.	The Dominion ISI Plan addresses pressure retaining bolting under Table IWE-2500-1 Category E-G of the 1992e with the 1992a. The later code eliminates this category and combines the requirement with Category E-A. Dominion is continuing the Category E-G requirements and is not changing the bolting examination requirements in

Code Paragraph	1992e with 1992a	2001e through 2003a	Noted differences	Comments
				this request. No issue.
IWE-3510.4	No paragraph	Moisture barriers with wear, damage, erosion, tear, surface cracks, or other defects that permit intrusion of moisture against inaccessible areas of the pressure retaining surfaces of the metal containment shell or liner shall be corrected by corrective measures.	The earlier code did not address moisture barriers as part of Category E-A. The earlier code addressed moisture barriers in Category E-D.	Dominion is not requesting the use of Item number E1.30 associated with moisture barriers. No issue.

ATTACHMENT 3

COMPARISON OF CODE REQUIREMENTS FOR IWA 2300 VT-3 EXAMINER QUALIFICATION/CERTIFICATION

NORTH ANNA AND SURRY POWER STATIONS UNITS 1 AND 2
VIRGINIA ELECTRIC AND POWER COMPANY
(DOMINION)

Comparison of Code Requirements for IWA 2300 VT-3 Examiner Qualification/Certification

(1998 Edition through the 2000 Addenda vs. 2001 Edition through the 2003 Addenda of ASME Section XI)
(Only addresses the differences, if paragraph not included, they are the same.)

Code Paragraph	1998e through 2000a	2001e through 2003a	Noted differences	Comments
Table IWA-2322-1	Near - Distance Acuity Test Distances and Character Heights	Same	Added metric values	No issue
IWA-2323(a)	The basic examination shall consist of at least 50 questions (required only once if certification is sought in more than one method): (1) 20% to 30% of the questions shall cover ANSI / ASNT CP-189. (2) 30% to 50% of the questions shall be similar to the Level II questions published by ASNT for the NDE methods referenced in ANSI / ASNT CP-189. (3) 20% to 30% of the questions shall cover applicable materials,	The basic examination shall consist of at least 50 questions (required only once if certification is sought in more than one method): (1) At least 20 questions related to understanding of ANSI /ASNT CP-189. (2) At least 30 questions related to applicable materials, fabrication, and product technology. (3) At least 15 questions that are similar to published Level II questions for other NDT methods.	The later code removes percentage requirements. Number of required questions shifted in areas to be addressed.	Not seen as significant. Basic exam not required for Level III recertification.

Code Paragraph	1998e through 2000a	2001e through 2003a	Noted differences	Comments
	products, and fabrication technology.			
IWA-2323(b)	The Method Examination shall consist of at least 65 questions: (1) 20% to 40% of the questions shall cover fundamentals and principles of the method and shall be similar to published ASNT Level III questions. (2) 30% to 50% of the questions shall cover applications and establishment of procedures and techniques and shall be similar to published ASNT Level III questions. (3) 20% to 30% of the questions shall cover the capability to interpret codes, standards, and specifications for the method.	The Method Examination shall consist of at least 65 questions: (1) At least 30 questions related to fundamentals and principles that are similar to published ASNT Level III questions for each method. (2) At least 15 questions related to application and establishment of procedures and techniques that are similar to published ASNT Level III questions for each method. (3) At least 20 questions related to capability for interpreting codes, standards, and specifications related to the method.	The later code removes percentage requirements. Number of required questions shifted in areas to be addressed.	Not seen as significant. Section XI in IWA-2310(a) accepts earlier code certifications until recertification is required. As such, a Level III may be certified for some time period to an earlier code within the subsequent interval.
IWA-2380	NDE Instructors shall	In lieu of the	The later code moved	No issue.

Code Paragraph	1998e through 2000a	2001e through 2003a	Noted differences	Comments
	meet the requirements of Appendix VII. (VII-4140 - A candidate being considered for qualification as an NDE Instructor shall satisfy the Level III Basic and Method Examination requirements of IWA-2300 and shall also meet one of the following requirements: (a) the candidate shall maintain a current teacher or vocational instructor certificate issued by a state, municipal, provincial, or federal authority; or (b) the candidate shall complete a minimum of 40 hr instruction in training and teaching techniques.	requirements of CP-189, a candidate being considered for qualification as an NDE Instructor shall satisfy the Level III Basic and Method Examination requirements of IWA-2323 and shall meet one of the following requirements: (a) maintain a current teacher or vocational instructor certificate issued by a state, municipal, provincial, or federal authority; or (b) complete a minimum of 40 hr instruction in training and teaching techniques.	the location of these requirements. The requirements remain the same.	