UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

10/27/06
71 FR 62947
(3)

RECEIVED
2007 JAN -3 PM 5:35
RULES AND DIRECTIVES
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W. Norris
(WEN)

NRCREP - Comments on Draft Reg Guide DG-1133 Supplemented by Federal Register, Vol. 71, No. 208, pages 62947 - 62954

From: "Kerr, Daniel" <DSK1@pge.com>
To: <wen@nrc.gov>, <nrcrep@nrc.gov>
Date: 01/02/2007 8:32 PM
Subject: Comments on Draft Reg Guide DG-1133 Supplemented by Federal Register, Vol. 71, No. 208, pages 62947 - 62954

Dear Mr. Norris,

The purpose of this email is to provide comments on the subject documents, related to the use of ultrasonic examination (UT) in-lieu-of radiography (RT) for ASME B&PV Code, Section III, Code Case N-659.

Comment 1: General - I could not access the website referenced on page 62947 of the subject FR, i.e. - http://ruleform.llnl.gov returned an error message "...Unable to determine IP address from host name for *unknown server name...*" It appears to be a bad URL address.

Comment 2: General - I agree with the well-articulated comments submitted on these documents by Douglas Henry, dated 1/1/07. In addition, I have the following comments.

Comment 3: Page 62949 of the subject FR - The sentence "The demonstration must show the capability to detect flaws having a minimum 2% through-wall depth and within the flaw length acceptance of NB-2553(c)" is excessively conservative and not clear.

A) First, if I interpret the above sentence conservatively, the intended 2% (not to exceed?) is unreasonable and excessive for an adequate UT examination. It appears to be based on typical ASME Section V RT penetrameter requirements and should not be a requirement for an adequate UT examination. As you have noted in the discussion on page 62948 of the subject FR, the physics of a RT examination are much different than the physics of a UT examination. For this Code Case I suggest something more appropriate and realistic, in-line with what is specified in ASME Section Section VIII Code Case 2235, which is approximately 10%.

B) Second, no matter what value is specified, the existing wording is not clear. Using my suggested value of 10%, "a minimum of 10%" could be interpreted non-conservatively as allowing the demonstration to show detection of flaws 10% or greater, such as 11% or even a 100% flaw. More appropriate wording might be something like "... capability to detect flaws having a *through-wall extent not exceeding 10% of the nominal wall thickness* and..." instead of using the confusing term "minimum."

Comment 4: Page 62949 of the subject FR, middle of the page in the left margin - Change the sentence "For qualification, all flaws shall be correctly identified as acceptable or unacceptable." to the following: "For qualification *purposes only, after applying a flaw length tolerance equal to +/- 10% of the nominal wall thickness, or (approximately) +/- 0.2", whichever is greater, to the recorded flaw length,* all flaws shall be correctly identified as acceptable or unacceptable." I believe this is more clear, as well as more reasonable and realistic all things considered. Otherwise, for example, if a length of 0.50" is the Code acceptance standard, a person would get a demerit for recording a real 0.50" long flaw as an acceptable 0.45" long flaw, or even an acceptable 0.49" long flaw. And visa versa if they recorded a barely acceptable flaw as unacceptable.

Comment 5: Pages 62948 and 62949 of the subject FR - If the current number of required qualification flaws remains the same, consider, within limitations, allowing a single qualification flaw to be counted more than once to meet the requirement for "A minimum of 10 flaws..." (for sizing), or the number of flaws required for detection. For example, a single flaw on the upstream side of a base metal-to-weld fusion zone weld prep could be considered 2 separate flaws if it can be

properly detected or sized from both the upstream and downstream sides independently. Another example might be the use of a different UT mode (e.g. - shear, longitudinal, surface, creeping wave, etc.) or angle (more than ~5° different?) to detect the same flaw. All methods used to record the required number of flaws properly would then be required to be part of a qualified procedure. A much smaller number of flaws could then still provide the intended statistical basis for substantially less cost.

Please contact me at the email address or phone numbers below if you have any questions regarding my comments.
Sincerely,

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TLS Report #420DC-07.1

Mail Envelope Properties (459B07B2.5AB : 14 : 46507)

Subject: Comments on Draft Reg Guide DG-1133 Supplemented by Federal Register, Vol. 71, No. 208, pages 62947 - 62954
Creation Date Tue, Jan 2, 2007 8:32 PM
From: "Kerr, Daniel" <DSK1@pge.com>

Created By: DSK1@pge.com

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Files	Size	Date & Time
MESSAGE	4373	Tuesday, January 2, 2007 8:32 PM
TEXT.htm	6506	
Mime.822	13622	

Options
Expiration Date: None
Priority: Standard
ReplyRequested: No
Return Notification: None

Concealed Subject: No
Security: Standard

Junk Mail Handling Evaluation Results
Message is eligible for Junk Mail handling
This message was not classified as Junk Mail

Junk Mail settings when this message was delivered
Junk Mail handling disabled by User
Junk Mail handling disabled by Administrator
Junk List is not enabled
Junk Mail using personal address books is not enabled
Block List is not enabled