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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

AREVA Comments to add 10 CFR 50.55a (g)(6)(ii)(D)

AREVA has comments to the NRC rulemaking to add 10 CFR 50.55a(g)(6)(ii)(D) – Regarding a new provision that will require augmented inspection of PWR reactor vessel heads using Code Case N-729-1 with cited conditions.

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AREVA has reviewed all of the comments contained in ASME letter dated June 13, 2007 pertaining to the addition of Code Case N-729-1 to the subject rulemaking and concurs with the ASME comments. In addition, AREVA NDE Services has the following comments associated with the following conditions that are being proposed for the incorporation of this code case into the subject rulemaking:

1. Under subparagraph (D) (2) – the requirement is being added to perform a surface examination on all J-groove welds.
    a. This eliminates the option to perform a leak path assessment, and the surface examination of all J-groove welds would be mandatory. The leak path assessment was used by some licensees, with the NRC approving some relief requests to use the leak path assessment.
    b. Adding the 100% surface examination of the J-Groove Weld examination has the potential impact of increasing the time required to complete a vessel head examination by an additional 7 to 10 days. In addition, the surface condition of many of the J-groove welds is not conducive to examination by eddy current and additional time may be needed for surface preparation.
    c. As an inspection vendor, we don't see that the addition of this surface examination provides any additional assurance of safety over the visual and volumetric examinations that are already being performed. We believe that the requirement for 100% surface examination of all J-Groove Weld should be dropped from the rulemaking and that the requirements of NRC Order EA-03-009 are more appropriate.
    d. Our understanding that the primary reason that leak path assessment was not included in the code case was due to perceived difficulties with demonstrating the validity of the leak path assessment technique. Two inspection vendors have the capability to perform leak path assessments and have demonstrated the validity of the technique as part of their internal procedure qualifications processes. We believe that the leak path assessment should still be allowed as an alternative when needed to supplement coverage.

2. Under subparagraph (D) (4) (iv) – Acceptance criteria are being added to meet a 1/32" (0.8mm) depth sizing RMS (root mean square) error for flaw depth measurements. In addition, the procedures, equipment and

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personnel must meet a 1/16" (1.6mm) length sizing RMS error for flaw length measurements.

a. The detection of these flaw sizes may have been achievable in laboratory conditions using EDM notches, under special scanning or technique conditions. As a comparison of detection and sizing limits, PDI only requires a 1/8" (3.2 mm) sizing accuracy for procedure qualification on dissimilar metal welds. Implementing techniques that have capability of the proposed sizing accuracy will result in examination techniques that are overly sensitive for the weld conditions that are found in the field. This oversensitivity will likely result in the detection, evaluation, and potential repair of many fabrication flaws that were previously accepted under the construction code requirements. As an inspection vendor, we don't see that the addition of these acceptance criteria provide any additional assurance of safety over the acceptance criteria being used for the volumetric examinations that are already being performed.

3. Under subparagraph (D) (4) the NRC is recommending a procedure and personnel qualification that is similar to an ASME Section XI, Appendix VIII ultrasonic examination performance demonstration process. This type of qualification would be similar to an ASME Section V, Article 14, and "Intermediate Rigor" qualification. We believe that this intermediate level of rigor is not warranted for this examination, since most procedures have already been demonstrated through the Materials Reliability Program (MRP) demonstration process. We believe that an ASME Section V, Article 14, "Low" Rigor qualification process is the more appropriate process to follow for these examinations. In addition, the use of a "low" rigor qualification process would permit a smoother transition from the existing MRP demonstration process to a new performance based demonstration process.

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Date: Fri, Jun 22, 2007 4:45 PM
Subject: AREVA NP Inc. Comments to Proposed Rule 10CFR50

See attached comments from AREVA NP Inc. to the proposed rulemaking to 10CFR50 for review and consideration.

Thank you for your time and consideration.

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