

**From:** Kimberly Green  
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**Date:** Tue, Oct 2, 2007 1:34 PM  
**Subject:** Draft RAIs for Nickel Alloy Inspection Program

Donna,

Attached are draft requests for additional information related to the Indian Point license renewal application. Please review and provide me with a couple of possible times for a telecon to discuss. The purpose of the telecon will be to obtain clarification on the staff's questions.

Thanks,

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Indian Point Nuclear Generating Unit Nos. 2 and 3  
License Renewal Application  
Draft Request for Additional Information Set 3  
Nickel Alloy Inspection Program

DRAI B.1.21-1

Nickel Alloy Inspection programs need to be plant specific. All locations of nickel based alloys need to be considered within the program. The industry has recognized this and developed, via the Electric Power Research Institute sponsored Materials Reliability Program, a document which establishes a standard guideline for plants to use in developing their Alloy 600 management plans that provides short- and long-term guidance for managing inspection, evaluation, mitigation, and repair/replacement of all Alloy 600 base material and Alloy 82/182 weld metal locations. This document is MRP-126, *Materials Reliability Program: Generic Guidance for Alloy 600 Management (MRP-126)*. Please confirm the Nickel Alloy Inspection program does or will contain the following attributes:

- a) Conform to the standards established in MRP-126.
- b) Include all locations where Alloy 600/82/182 materials are used in the plants. For components addressed under other programs, the nickel alloy inspection program is to identify the other programs governing the inspections.
- c) Establish inspection requirements consistent with mandatory industry requirements. Inspections are to also comply with applicable U.S. Nuclear Regulatory Commission (NRC) Orders, Bulletins, Generic Letters and NRC staff-accepted industry guidelines. Participate in industry initiatives, such as the owners' group programs and the Electric Power Research Institute Materials Reliability Program for managing aging effects associated with nickel alloy.
- d) Require that volumetric examinations on nickel alloy butt welds will be performed using personnel and procedures qualified in accordance with American Society of Mechanical Engineers Code, Section XI, Appendix VIII.
- e) Establish the basis for the acceptance criteria used in evaluating examination results.
- f) Include provisions for the expansion of examinations if a flaw, indication, or cracking is identified during volumetric, surface, or visual examinations, and require the expansion examinations to be completed during the same outage that the initial flaw, indication, or cracking was identified.

DRAI B.1.21-2

Please commit to re-submit the subject plant-specific Nickel Alloy Inspection program, including updated information and program changes, to the NRC for review and approval. The submittal is to be made no less than 24 months prior to entering the period of license extension.