Progress Energy

DEC 1 9 2007

10 CFR 50.55a(a)(3)(i)

SERIAL: BSEP 07-0145

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

Subject: Brunswick Steam Electric Plant, Unit Nos. 1 and 2
Docket Nos. 50-325 and 50-324/License Nos. DPR-71 and DPR-62
Request for Approval of Risk-Informed Inservice Inspection Program for the Fourth 10-Year Interval

Ladies and Gentlemen:

In accordance with 10 CFR 50.55a(a)(3)(i), Carolina Power & Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc., is requesting NRC approval of an alternative to the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The enclosed proposed alternative, designated as Relief Request ISI-02, involves extension of the previously approved Risk-Informed Inservice Inspection (RI-ISI) Program to the fourth 10-year inservice inspection interval. Relief requests for the fourth 10-year inservice inspection interval which are not associated with the RI-ISI Program are being submitted separately.

No regulatory commitments are contained in this letter. Please refer any questions regarding this submittal to Ms. Annette H. Pope, Supervisor - Licensing/Regulatory Programs, at (910) 457-2184.

Sincerely,

Randy C Ivey

Randy C. Ivey
Manager - Support Services
Brunswick Steam Electric Plant

**Progress Energy Carolinas, Inc.**
Brunswick Nuclear Plant
PO Box 10429
Southport, NC 28461

A047
NRR

WRM/wrm

Enclosure: 10 CFR 50.55a Request Number ISI-02

cc (with enclosure):

U. S. Nuclear Regulatory Commission, Region II
ATTN: Mr. Victor M. McCree, Regional Administrator (Acting)
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW, Suite 23T85
Atlanta, GA 30303-8931

U. S. Nuclear Regulatory Commission
ATTN: Mr. Joseph D. Austin, NRC Senior Resident Inspector
8470 River Road
Southport, NC 28461-8869

U. S. Nuclear Regulatory Commission **(Electronic Copy Only)**
ATTN: Mr. Stewart N. Bailey (Mail Stop OWFN 8B1)
11555 Rockville Pike
Rockville, MD 20852-2738

Chair - North Carolina Utilities Commission
P.O. Box 29510
Raleigh, NC 27626-0510

Mr. Jack Given, Bureau Chief
North Carolina Department of Labor
Boiler Safety Bureau
1101 Mail Service Center
Raleigh, NC 27699-1101

**10 CFR 50.55a Request Number ISI-02**

Proposed Alternative In Accordance with 10 CFR 50.55a(a)(3)(i)

- Acceptable Level of Quality and Safety -

## 1. ASME Code Component(s) Affected

| | |
|---|---|
| Code Class: | Class 1 |
| Category: | B-J and B-F |
| System: | See Notes (pages 8 and 13) |
| Affected Components: | Pressure Retaining Piping |

## 2. Applicable Code Edition and Addenda

The Code of Record for the fourth 10-year inservice inspection interval at the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2, is the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, 2001 Edition with 2003 Addenda.

The fourth 10-year inservice inspection interval will begin May 11, 2008, and will conclude on May 10, 2018.

## 3. Applicable Code Requirement

The following Code requirements are paraphrased from the 2001 Edition through the 2003 Addenda of the ASME Code, Section XI:

Table IWB-2500-1, Examination Category B-F, requires volumetric and surface examinations on all welds for Items B5.10.

Table IWB-2500-1, Examination Category B-J, requires volumetric and/or surface examinations on a sample of welds for items B9.11, B9.21, B9.31, B9.32, and B9.40. The weld population selected for inspection includes the following:

1. All terminal ends in each pipe or branch run connected to vessels.

2. All terminal ends and joints in each pipe or branch run connected to other components where the stress levels exceed either of the following limits under loads associated with specific seismic events and operational conditions:

   a. primary plus secondary stress intensity range of $2.4S_m$ for ferritic steel and austenitic steel.

   b. cumulative usage factor $U$ of 0.4.

3. All dissimilar metal welds not covered under Category B-F.

4. Additional piping welds so that the total number of circumferential butt welds, branch connections, or socket welds selected for examination equals 25 percent of the circumferential butt welds, branch connections, or socket welds in the reactor coolant piping system. This total does not include welds exempted by IWB-1220 or welds in Item No. B9.22.

## 4. Reason for Request

ASME Code, Section XI, Examination Categories B-F and B-J currently contain the requirements for the nondestructive examination of Class 1 pressure retaining welds. The previously approved RI-ISI program (i.e., Reference 1) was substituted for Class 1 piping (Examination Categories B-F and B-J) in accordance with 10 CFR 50.55a(a)(3)(i) by alternatively providing an acceptable level of quality and safety. The purpose of this request is for the continued application of the RI-ISI methodology on Class 1 pressure retaining welds during the fourth inspection interval. Other non-related portions of the ASME Code, Section XI, will be unaffected. For example, existing pressure testing requirements remain unchanged.

In accordance with 10 CFR 50.55a(a)(3)(i), relief is requested on the basis that the proposed alternative using Electric Power Research Institute (EPRI) Topical Report TR-112657, "Risk-Informed Inservice Inspection Evaluation Procedure," (i.e., Reference 1) will provide an acceptable level of quality and safety.

## 5. Proposed Alternative and Basis for Use

In accordance with 10 CFR 50.55a(a)(3)(i), Carolina Power & Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc., requests NRC approval of the BSEP Risk-Informed Inservice Inspection (RI-ISI) Program as an alternative to the ASME Code, Section XI, 2001 Edition with 2003 Addenda inspection requirements for Class 1 Examination Category B-J and B-F pressure retaining welds.

The current BSEP RI-ISI Program was developed in accordance with the EPRI methodology contained in EPRI Topical Report TR-112657, "Revised Risk-Informed Inservice Inspection Evaluation Procedure," (i.e., Reference 1). The current BSEP RI-ISI Program was approved by NRC letter dated November 28, 2001, (i.e., Reference 2) for use during the second and third periods of the third 10-year inspection interval.

The fourth interval RI-ISI Program will be a continuation of the current application and has been updated consistent with the intent of NEI 04-05, "Living Program Guidance to Maintain Risk-Informed Inservice Inspection Programs for Nuclear Plant Piping Systems," (i.e., Reference 3) and continues to meet EPRI TR-112657 and Regulatory Guide 1.174 (i.e., Reference 4) risk acceptance criteria.

In addition to the risk-informed evaluation, selection, and examination procedure, all ASME Code, Section XI components, regardless of risk classification, will continue to receive Code-required pressure testing as part of the current ASME Code, Section XI program. Visual examinations (i.e., VT-2) are implemented in accordance with the BSEP pressure testing program, which remains unaffected by the RI-ISI Program.

## 6. Duration of Proposed Alternative

Use of the alternative is proposed for the fourth 10-year inservice inspection interval, which will begin on May 11, 2008, and will conclude on May 10, 2018.

## 7. Precedents

The NRC previously approved the BSEP RI-ISI Program, by Reference 2, for use during the third 10-year inservice inspection interval.

## 8. References

1. Electric Power Research Institute Topical Report TR-112657, Revision B-A, "Revised Risk-Informed Inservice Inspection Evaluation Procedure," Palo Alto, CA: 1999.

2. NRC letter dated November 28, 2001, "Brunswick Steam Electric Plant, Unit Nos. 1 and 2– Safety Evaluation for the Risk-Informed Inservice Inspection (RI-ISI) Program, TAC Nos. MB1760 and MB1761."

3. NEI 04-05, "Living Program Guidance to Maintain Risk-Informed Inservice Inspection Programs for Nuclear Plant Piping Systems," dated April 2004.

4. NRC Regulatory Guide 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis."

5. CP&L Letter dated April 20, 2001, "Brunswick Steam Electric Plant, Unit Nos. 1 and 2, Third Ten Year Inservice Inspection Interval – Request for Approval of Risk-Informed Inservice Inspection Program."

6. Electric Power Research Institute, Risk-Informed Inservice Inspection (RI-ISI) Report for the Brunswick Steam Electric Plant, December 2007.

## Table 1

## Unit 1 Inspection Location Selection Comparison Between Existing and New RI-ISI Interval by Risk Category

| System[1] | Risk | | Consequence Rank | Failure Potential | | Code Category | Weld Count | 1st Approved RI-ISI Interval | | New RI-ISI Interval | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Category | Rank | | DMs | Rank | | | RI-ISI | Other[2] | RI-ISI | Other[2] |
| RPV | 4 (2) | Medium (High) | High | None (IGSCC) | Low (Medium) | B-F | 2 | 1[3] | | 1[3] | |
| RPV | 4 | Medium | High | None | Low | B-F | 3 | 1 | | 1 | |
| RPV | 5 | Medium | Medium | TASCS | Medium | B-F | 2 | 1 | | 1 | |
| RPV | 6 | Low | Medium | None | Low | B-F | 2 | 0 | | 0 | |
| | | | | | | B-J | 4 | 0 | | 0 | |
| RCR | 2 | High | High | CC | Medium | B-F | 10 | 3 | | 3 | |
| RCR | 4(2) | Medium (High) | High | None (IGSCC) | Low (Medium) | B-F | 2 | 0 | | 0 | |
| | | | | | | B-J | 64 | 7[4] | | 7[4] | |
| RCR | 4 | Medium | High | None | Low | B-J | 35 | 4 | | 4 | |
| RWCU | 4(1) | Medium (High) | High | None (IGSCC, FAC) | Low (High) | B-F | 1 | 1[5] | | 1[5] | |
| RWCU | 4 (1) | Medium (High) | High | None (FAC) | Low (High) | B-J | 3 | 1 | | 1 | |
| RWCU | 4(2) | Medium (High) | High | None (IGSCC) | Low (Medium) | B-J | 1 | 1[6] | | 1[6] | |
| RWCU | 4 | Medium | High | None | Low | B-J | 13 | 2 | | 2 | |
| RWCU | 6 | Low | Medium | None | Low | B-J | 6 | 0 | | 0 | |
| RCIC | 4 (1) | Medium (High) | High | None (FAC) | Low (High) | B-J | 11 | 1 | | 1 | |
| RCIC | 4 | Medium | High | None | Low | B-J | 3 | 1 | | 1 | |
| RCIC | 6 (3) | Low (High) | Medium | None (FAC) | Low (High) | B-J | 1 | 0 | | 0 | |
| RCIC | 6 | Low | Medium | None | Low | B-J | 22 | 0 | | 0 | |

## Table 1

## Unit 1 Inspection Location Selection Comparison Between Existing and New RI-ISI Interval by Risk Category

| System[1] | Risk | | Consequence Rank | Failure Potential | | Code Category | Weld Count | 1st Approved RI-ISI Interval | | New RI-ISI Interval | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Category | Rank | | DMs | Rank | | | RI-ISI | Other[2] | RI-ISI | Other[2] |
| RHR | 4 (2) | Medium (High) | High | None (IGSCC) | Low (Medium) | B-F | 3 | 0 | | 0 | |
| | | | | | | B-J | 2 | 1[7] | | 1[7] | |
| RHR | 4 | Medium | High | None | Low | B-J | 11 | 2 | | 2 | |
| RHR | 7 | Low | Low | None | Low | B-J | 23 | 0 | | 0 | |
| CS | 2 | High | High | CC | Medium | B-F | 2 | 1 | | 1 | |
| CS | 4 | Medium | High | None | Low | B-F | 2 | 0 | | 0 | |
| | | | | | | B-J | 39 | 5 | | 5 | |
| CS | 7 | Low | Low | None | Low | B-J | 6 | 0 | | 0 | |
| HPCI | 4 | Medium | High | None | Low | B-J | 28 | 3 | | 3 | |
| HPCI | 6 | Low | Medium | None | Low | B-J | 7 | 0 | | 0 | |
| MS | 4 | Medium | High | None | Low | B-J | 109 | 11 | | 11 | |
| MS | 6 | Low | Medium | None | Low | B-J | 4 | 0 | | 0 | |
| FW | 2 (1) | High (High) | High | TASCS, CC (IGSCC, FAC) | Medium (High) | B-F | 2 | 0 | | 0 | |
| FW | 2 (1) | High (High) | High | TASCS (IGSCC, FAC) | Medium (High) | B-F | 2 | 1[8] | | 1[8] | |
| FW | 2 (1) | High (High) | High | CC (IGSCC, FAC) | Medium (High) | B-F | 2 | 1[9] | | 1[9] | |
| FW | 2 (1) | High (High) | High | TASCS, CC (FAC) | Medium (High) | B-J | 4 | 2 | | 2 | |

## Table 1

## Unit 1 Inspection Location Selection Comparison Between Existing and New RI-ISI Interval by Risk Category

| System[1] | Risk | | Consequence Rank | Failure Potential | | Code Category | Weld Count | 1st Approved RI-ISI Interval | | New RI-ISI Interval | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Category | Rank | | DMs | Rank | | | RI-ISI | Other[2] | RI-ISI | Other[2] |
| FW | 2 (1) | High (High) | High | TASCS (FAC) | Medium (High) | B-J | 6 | 2 | | 2 | |
| FW | 2 (1) | High (High) | High | CC (FAC) | Medium (High) | B-J | 4 | 0 | | 0 | |
| FW | 2 (2) | High (High) | High | TASCS (IGSCC) | Medium (Medium) | B-J | 2 | 1[10] | | 1[10] | |
| FW | 4 (1) | Medium (High) | High | None (IGSCC, FAC) | Low (High) | B-F | 2 | 1[11] | | 1[11] | |
| FW | 4 (1) | Medium (High) | High | None (FAC) | Low (High) | B-J | 63 | 7 | | 7 | |
| FW | 4 (2) | Medium (High) | High | None (IGSCC) | Low (Medium) | B-J | 2 | 1[12] | | 1[12] | |
| FW | 5 (3) | Medium (High) | Medium | TASCS (FAC) | Medium (High) | B-J | 1 | 1 | | 1 | |
| FW | 6 (3) | Low (High) | Medium | None (FAC) | Low (High) | B-J | 1 | 0 | | 0 | |
| CRD | 4 | Medium | High | None | Low | B-F | 1 | 1 | | 1 | |
| JPI | 4 (2) | Medium (High) | High | None (IGSCC) | Low (Medium) | B-J | 2 | 1[13] | | 1[13] | |

## Table 1 Notes

1. System designations are as follows:
   CRD – Control Rod Drive
   CS – Core Spray
   HPCI – High Pressure Coolant Injection
   FW - Feedwater
   JPI – Jet Pump Instrumentation
   MS – Main Steam (i.e., Nuclear Boiler)
   RCIC – Reactor Core Isolation Cooling
   RCR – Reactor Coolant Recirculation
   RHR – Residual Heat Removal
   RPV – Reactor Pressure Vessel
   RWCU – Reactor Water Clean-up
2. The column labeled "Other" is generally used to identify augmented inspection program locations credited per Section 3.6.5 of EPRI TR-112657. The EPRI methodology allows augmented inspection program locations to be credited if the inspection locations selected strictly for RI-ISI purposes produce less than a 10% sampling of the overall Class 1 weld population. As stated in Section 3.5 of Reference 4, BSEP achieved greater than a 10% sampling without relying on augmented inspection program locations beyond those selected by the RI-ISI process. The "Other" column has been retained in this table solely for uniformity purposes with the other RI-ISI application template submittals.
3. This one weld was selected for examination by both the Intergranular Stress Corrosion Cracking (IGSCC) Program and the RI-ISI Program. Since IGSCC was the only potential damage mechanism for this weld, the IGSCC examination will be credited towards both programs.
4. These seven welds were selected for examination by both the IGSCC Program and the RI-ISI Program. Since IGSCC was the only damage mechanism identified for these welds, the IGSCC examinations will be credited toward both programs.
5. This one weld was selected for examination by both the IGSCC Program and the RI-ISI Program. Since IGSCC was the only potential damage mechanism for this weld, the IGSCC examination will be credited towards both programs.
6. This one weld was selected for examination by both the IGSCC Program and the RI-ISI Program. Since IGSCC was the only potential damage mechanism for this weld, the IGSCC examination will be credited towards both programs
7. This one weld was selected for examination by both the IGSCC Program and the RI-ISI Program. Since IGSCC was the only potential damage mechanism for this weld, the IGSCC examination will be credited towards both programs.

8. This one weld was selected for examination by both the IGSCC Program and the RI-ISI Program. Since thermal stratification, cycling and striping (TASCS) was identified along with IGSCC as a potential damage mechanism for this weld, the examination will include the requirements identified in EPRI TR-112657 for TASCS examinations in order to be credited towards both the IGSCC and RI-ISI programs.
9. This one weld was selected for examination by both the IGSCC Program and the RI-ISI Program. Since crevice corrosion was identified along with IGSCC as a potential damage mechanism for this weld, the examination will include the requirements identified in EPRI TR-112657 for crevice corrosion examinations in order to be credited towards both the IGSCC and RI-ISI programs.
10. This one weld was selected for examination by both the IGSCC Program and the RI-ISI Program. Since TASCS was identified along with IGSCC as a potential damage mechanism for this weld, the examination will include the requirements identified in EPRI TR-112657 for TASCS examinations in order to be credited towards both the IGSCC and RI-ISI programs.
11. This one weld was selected for examination by both the IGSCC Program and the RI-ISI Program. Since IGSCC was the only potential damage mechanism for this weld, the IGSCC examination will be credited towards both programs.
12. This one weld was selected for examination by both the IGSCC Program and the RI-ISI Program. Since IGSCC was the only potential damage mechanism for this weld, the IGSCC examination will be credited towards both programs.
13. This one weld was selected for examination by both the IGSCC Program and the RI-ISI Program. Since IGSCC was the only potential damage mechanism for this weld, the IGSCC examination will be credited towards both programs.

## Table 2

## Unit 2 Inspection Location Selection Comparison Between Existing and New RI-ISI Interval by Risk Category

| System[1] | Risk | | Consequence Rank | Failure Potential | | Code Category | Weld Count | 1st Approved RI-ISI Interval | | New RI-ISI Interval | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Category | Rank | | DMs | Rank | | | RI-ISI | Other[2] | RI-ISI | Other[2] |
| RPV | 4 (2) | Medium (High) | High | None (IGSCC) | Low (Medium) | B-F | 2 | 1[3] | | 1[3] | |
| RPV | 4 | Medium | High | None | Low | B-F | 3 | 1 | | 1 | |
| RPV | 5 | Medium | Medium | TASCS | Medium | B-F | 2 | 1 | | 1 | |
| RPV | 6 | Low | Medium | None | Low | B-F | 2 | 0 | | 0 | |
| | | | | | | B-J | 4 | 0 | | 0 | |
| RCR | 2 | High | High | CC | Medium | B-F | 10 | 3 | | 3 | |
| RCR | 4(2) | Medium (High) | High | None (IGSCC) | Low (Medium) | B-F | 2 | 2[4] | | 2[4] | |
| | | | | | | B-J | 64 | 5[5] | | 5[5] | |
| RCR | 4 | Medium | High | None | Low | B-J | 42 | 5 | | 5 | |
| RWCU | 4(1) | Medium (High) | High | None (FAC) | Low (High) | B-J | 4 | 1 | | 1 | |
| RWCU | 4 (2) | Medium (High) | High | None (IGSCC) | Low (Medium) | B-J | 1 | 1[6] | | 1[6] | |
| RWCU | 4 | Medium | High | None | Low | B-J | 12 | 2 | | 2 | |
| RWCU | 6 (5) | Low (Medium) | Medium | None (IGSCC) | Low (Medium) | B-F | 1 | 0 | | 0 | |
| RWCU | 6 | Low | Medium | None | Low | B-J | 6 | 0 | | 0 | |
| RCIC | 4 (1) | Medium (High) | High | None (FAC) | Low (High) | B-J | 12 | 2 | | 2 | |
| RCIC | 4 | Medium | High | None | Low | B-J | 3 | 1 | | 1 | |
| RCIC | 6 (3) | Low (High) | Medium | None (FAC) | Low (High) | B-J | 1 | 0 | | 0 | |

## Table 2

## Unit 2 Inspection Location Selection Comparison Between Existing and New RI-ISI Interval by Risk Category

| System[1] | Risk | | Consequence Rank | Failure Potential | | Code Category | Weld Count | 1st Approved RI-ISI Interval | | New RI-ISI Interval | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Category | Rank | | DMs | Rank | | | RI-ISI | Other[2] | RI-ISI | Other[2] |
| RCIC | 6 | Low | Medium | None | Low | B-J | 22 | 0 | | 0 | |
| RHR | 4 (2) | Medium (High) | High | None (IGSCC) | Low (Medium) | B-F | 3 | 0 | | 0 | |
| | | | | | | B-J | 2 | 1[7] | | 1[7] | |
| RHR | 4 | Medium | High | None | Low | B-J | 11 | 2 | | 2 | |
| RHR | 7 | Low | Low | None | Low | B-J | 22 | 0 | | 0 | |
| CS | 2 (2) | High (High) | High | CC (IGSCC) | Medium (Medium) | B-F | 2 | 1[8] | | 1[8] | |
| CS | 4 (2) | Medium (High) | High | None (IGSCC) | Low (Medium) | B-F | 2 | 1[9] | | 1[9] | |
| CS | 4 | Medium | High | None | Low | B-J | 39 | 4 | | 4 | |
| CS | 7 | Low | Low | None | Low | B-J | 6 | 0 | | 0 | |
| HPCI | 4 | Medium | High | None | Low | B-J | 26 | 3 | | 3 | |
| HPCI | 6 | Low | Medium | None | Low | B-J | 8 | 0 | | 0 | |
| MS | 4 | Medium | High | None | Low | B-J | 112 | 12 | | 12 | |
| MS | 6 | Low | Medium | None | Low | B-J | 4 | 0 | | 0 | |
| FW | 2 (1) | High (High) | High | TASCS, CC (FAC) | Medium (High) | B-J | 2 | 1 | | 1 | |
| FW | 2 (1) | High (High) | High | TASCS (FAC) | Medium (High) | B-J | 8 | 2 | | 2 | |
| FW | 2 (1) | High (High) | High | CC (FAC) | Medium (High) | B-J | 2 | 0 | | 0 | |
| FW | 4 (1) | Medium (High) | High | None (FAC) | Low (High) | B-J | 56 | 6 | | 6 | |
| FW | 5 (3) | Medium (High) | Medium | TASCS (FAC) | Medium (High) | B-J | 1 | 1 | | 1 | |

## Table 2

## Unit 2 Inspection Location Selection Comparison Between Existing and New RI-ISI Interval by Risk Category

| System[1] | Risk | | Consequence Rank | Failure Potential | | Code Category | Weld Count | 1st Approved RI-ISI Interval | | New RI-ISI Interval | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Category | Rank | | DMs | Rank | | | RI-ISI | Other[2] | RI-ISI | Other[2] |
| FW | 6 (3) | Low (High) | Medium | None (FAC) | Low (High) | B-J | 1 | 0 | | 0 | |
| CRD | 4 | Medium | High | None | Low | B-F | 1 | 1 | | 1 | |
| JPI | 4 (2) | Medium (High) | High | None (IGSCC) | Low (Medium) | B-J | 2 | 1[10] | | 1[10] | |

## Table 2 Notes

1. System designations are as follows:
   CRD – Control Rod Drive
   CS – Core Spray
   HPCI – High Pressure Coolant Injection
   FW - Feedwater
   JPI – Jet Pump Instrumentation
   MS – Main Steam (i.e., Nuclear Boiler)
   RCIC – Reactor Core Isolation Cooling
   RCR – Reactor Coolant Recirculation
   RHR – Residual Heat Removal
   RPV – Reactor Pressure Vessel
   RWCU – Reactor Water Clean-up
2. The column labeled "Other" is generally used to identify augmented inspection program locations credited per Section 3.6.5 of EPRI TR-112657. The EPRI methodology allows augmented inspection program locations to be credited if the inspection locations selected strictly for RI-ISI purposes produce less than a 10% sampling of the overall Class 1 weld population. As stated in Section 3.5 of Reference 4, BSEP achieved greater than a 10% sampling without relying on augmented inspection program locations beyond those selected by the RI-ISI process. The "Other" column has been retained in this table solely for uniformity purposes with the other RI-ISI application template submittals.
3. This one weld was selected for examination by both the IGSCC Program and the RI-ISI Program. Since IGSCC was the only potential damage mechanism for this weld, the IGSCC examination will be credited towards both programs.
4. These two welds were selected for examination by both the IGSCC Program and the RI-ISI Program. Since IGSCC was the only damage mechanism identified for these welds, the IGSCC examinations will be credited toward both programs.
5. These five welds were selected for examination by both the IGSCC Program and the RI-ISI Program. Since IGSCC was the only potential damage mechanism for this weld, the IGSCC examinations will be credited towards both programs.
6. This one weld was selected for examination by both the IGSCC Program and the RI-ISI Program. Since IGSCC was the only potential damage mechanism for this weld, the IGSCC examination will be credited towards both programs
7. This one weld was selected for examination by both the IGSCC Program and the RI-ISI Program. Since IGSCC was the only potential damage mechanism for this weld, the IGSCC examination will be credited towards both programs.

8. This one weld was selected for examination by both the IGSCC Program and the RI-ISI Program. Since crevice corrosion was identified along with IGSCC as a potential damage mechanism for this weld, the examination will include the requirements identified in EPRI TR-112657 for crevice corrosion examinations in order to be credited towards both the IGSCC and RI-ISI programs.
9. This one weld was selected for examination by both the IGSCC Program and the RI-ISI Program. Since IGSCC was the only potential damage mechanism for this weld, the IGSCC examination will be credited towards both programs.
10. This one weld was selected for examination by both the IGSCC Program and the RI-ISI Program. Since IGSCC was the only potential damage mechanism for this weld, the IGSCC examination will be credited towards both programs.