

(Via email)

August 11, 2006

To: MRP Technical Advisory Group

Subject: MRP-139 Interim Guidance (Mandatory Element)

References

1. MRP Letter 2006-013, *MRP Review Board Procedure and MRP-139 Resolved Inquiries: Inquiry MRP139-09*, March 2, 2006
2. *Primary System Piping Butt Weld Inspection and Evaluation Guidelines (MRP-139)* 1010087, August 2005

To ensure consistent application of the reference guideline, MRP established a formal industry process whereby clarification and interpretation may be obtained. This process is described in the Reference 1 letter and was approved by the MRP IIG in March 2006 and will be incorporated into the next version of the MRP Administrative Procedures.

During the discussion of inquiry MRP139-09, the Review Board asked the Butt Weld guideline committee to consider the need to modify MRP-139 with interim guidance. Specifically, the guideline committee was asked to determine that if a utility cannot inspect or mitigate by the dates in Section 1.2 and is doing additional measures as laid out in 5.1.7, should the utility document this as a deviation? This letter is the result of this deliberation.

INTERIM GUIDANCE

Upon receipt of this letter, it is mandatory that any plant that does not meet the implementation dates stated in Section 1.2 of MRP-139 shall process the inability to meet the date as a deviation under the guidance of NEI-03-08. MRP review process for deviations will be incorporated into the next version of the MRP Administrative Procedures.

If you have any questions or concerns, please contact Craig Harrington (charrington@epri.com, 972-556-6519) or Dana Covill (dana.covill@pgnmail.com, 919-546-2631).

Best Regards,

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(on behalf of Mike Robinson, Duke Energy, Chairman MRP IIG)

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