

November 1, 2007

To: MRP Technical Advisory Group

Subject: MRP-139 Interim Guidance on Bare Metal Visual Exam Requirements (Mandatory Element)

References

1. MRP139-013 (Inquiry), *MRP-139 Required Bare Metal Visual Exams*
2. MRP 2005-014, transmittal letter for “*Primary System Piping Butt Weld Inspection and Evaluation Guideline (MRP-139)*”
3. MRP 2004-05, “*Needed Action For Visual Inspection of Alloy 600 82/182 Butt Welds and Good Practice Recommendations Weld Joint Configurations.*”

The MRP-139 Advisory Panel review of inquiry MRP139-013 (Ref. 1) determined that transmittal letter MRP-2005-014 (Ref. 2) provided the initial BMV inspection requirements for butt-welds that also had volumetric requirements but did not provide initial BMV inspection requirements for butt-welds ≥ 1 ” but < 4 ” not having additional volumetric inspections. Therefore, the interim guidance below specifies requirements for these small diameter welds and is mandatory per NEI-03-08 guidelines.

INTERIM GUIDANCE

For those locations ≥ 1 ” NPS and < 4 ” NPS within the scope of this document but without an explicit requirement for volumetric examination, the initial MRP-139 visual exam shall be performed no later than the first refueling outage which begins after July 1, 2008. Subsequent BMV exams shall follow the schedule as specified in Table 6-2. The most recently conducted visual exam meeting the requirements of Section 5.2 may be credited as the initial MRP-139 visual exam.

MRP 2004-05 requires initial bare metal visual exams to be completed within two RFO’s from the spring, 2004 outages. Setting an effective date of July 1, 2008 ensures an efficient transition of BMV requirements from MRP 2004-05 to MRP-139 and a reasonable time period to include this inspection scope in outage plans. If crediting visual examinations already performed as the initial MRP-139 visual inspection, the required Table 6.2 re-inspection RFO shall be based upon the RFO that the credited initial inspection was implemented.

If you have any questions or concerns, please contact Craig Harrington (charrington@epri.com, 972-556-6519).

Best Regards,
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