



March 13, 2008

10 CFR 54

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

Palisades Nuclear Plant
Docket 50-255
License No. DPR-20

License Renewal Commitment to Submit Alloy 600 Program

Dear Sir or Madam:

Nuclear Management Company, LLC (NMC, the former license holder) letter to the Nuclear Regulatory Commission (NRC), dated April 26, 2006 (ML061170214), responded to NRC follow up questions related to Palisades Nuclear Plant (PNP) license renewal. NMC included a revised commitment on the Alloy 600 Program in the letter. In NUREG-1871, "Safety Evaluation Report Related to the License Renewal of Palisades" (ML062710074), January 2007, the NRC discussed the Alloy 600 Program and reiterated the NMC commitment to submit a revised Alloy 600 Program description for NRC review and approval by March 24, 2008.

Enclosure 1 contains PNP engineering procedure EM-09-22, "Nickel-Alloy Program," Revision 0.

EM-09-22 contains references to NMC fleet procedures that are in the process of being replaced with Entergy Nuclear Operations, Inc, (ENO) procedures. A NMC to ENO document cross-reference matrix is in place to identify the corresponding ENO procedures as they replace the NMC procedures.

Summary of Commitments

This letter contains no new commitments. This letter completes the following commitment:

"NMC will revise the Alloy 600 Program to update the PWSCC [primary water stress corrosion cracking] corrosion rate assessments and inspection program consistent with the latest NRC requirements and inspection program consistent with the latest NRC requirements and industry commitments (e.g., EPRI [Electric Power Research Institute])

Document Control Desk

Page 2

Report 1010087 "Materials Reliability Program [MRP]: Primary System Piping System Butt Weld Inspection and Evaluation Guidelines [MRP-139]," (August 2005)). The updated program will be submitted for NRC review and approval by March 24, 2008."

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 13, 2008.



Christopher J. Schwarz
Site Vice President
Palisades Nuclear Plant

Enclosure (1)

CC Administrator, Region III, USNRC
Project Manager, Palisades, USNRC
Resident Inspector, Palisades, USNRC

ENCLOSURE 1

Palisades Nuclear Plant
Engineering Manual Procedure
Procedure No. EM-09-22
Revision 0
Nickel-Alloy Program

15 pages follow

PALISADES NUCLEAR PLANT
ENGINEERING MANUAL PROCEDURE

TITLE: NICKEL-ALLOY PROGRAM

Approved: MWAcker / 4/19/07
Procedure Sponsor Date

New Procedure/Revision Summary:

This new procedure formalizes, in one document, the Palisades programmatic requirements for managing PWSCC in 251 nickel-base alloy components within the reactor coolant pressure boundary. It satisfies the intent of the mandatory requirements of MRP-126. It also provides an appropriate Palisades-specific vehicle for implementing the Alloy 600 program commitment made for the renewed operating license.

This procedure was developed using the generic guidance provided in MRP-126 and, given that the program is implemented under the auspices of ISI, is presented in a form similar to that used in the Engineering Manual procedure for Inservice Inspection. This procedure does not contain specifics which already exist elsewhere; rather, it is intended to point the user to the locations where those specifics are captured.

Specific Changes

Not applicable

TITLE: NICKEL-ALLOY PROGRAM

Table of Contents

1.0	PURPOSE	1
2.0	SCOPE	1
2.1	DEFINITIONS.....	2
	2.1.1 Nickel-Alloys	2
	2.1.2 Primary Water Stress Corrosion Cracking (PWSCC).....	2
	2.1.3 Component	2
3.0	REFERENCES	3
3.1	SOURCE DOCUMENTS	3
3.2	REFERENCE DOCUMENTS	4
3.3	COMMITMENTS	4
4.0	RESPONSIBILITIES AND ADMINISTRATION.....	5
4.1	PROGRAMS ENGINEERING	5
4.2	PLANT ENGINEERING	5
4.3	SITE MAINTENANCE AND PROJECTS	5
4.4	ADMINISTRATIVE CONTROLS.....	6
	4.4.1 Program Development and Maintenance.....	6
	4.4.2 Requests for Relief from the Provisions of Section XI	6
	4.4.3 ISI Master Plan Updates	6
	4.4.4 Program Revision	6
	4.4.5 Program Continuity.....	6
	4.4.6 Program Engineering.....	6
4.5	PLANT AND INDUSTRY OPERATING EXPERIENCE	7
5.0	PROGRAM REQUIREMENTS	7
5.1	PROGRAM COMMITMENTS.....	7
	5.1.1 Renewed License Commitment	7
	5.1.2 Other Commitments.....	7

TITLE: NICKEL-ALLOY PROGRAM

Table of Contents

5.2	KEY PROGRAM ELEMENTS	8
5.2.1	Identification of Susceptible Locations	8
5.2.2	Component Ranking	8
5.2.3	Mitigation	9
5.2.4	Detection.....	9
5.2.5	Repair or Replacement	9
5.3	EXAMINATION REQUIREMENTS.....	10
5.3.1	Examination Methods and Frequency.....	10
5.3.2	Examination Agency Project Plan	10
5.3.3	Examination Procedures	10
5.3.4	Inspection Activities	10
5.3.5	Audits or Assessments	10
5.3.6	Reportable Indications	11
5.3.7	Evaluation of Indications.....	11
5.3.8	Disposition of Indications	11
5.3.9	Administrative Anomalies	12
6.0	ATTACHMENTS AND RECORDS.....	12
6.1	ATTACHMENTS	12
6.2	RECORDS	12
7.0	SPECIAL REVIEWS	12

TITLE: NICKEL-ALLOY PROGRAM

REFERENCE USE
<ul style="list-style-type: none">• Procedure should be at the work location.• Procedure segments may be performed from memory.• Use the procedure to verify segments have been completed.• Mark off steps within the segment before continuing.

1.0 PURPOSE

This procedure provides the overall programmatic requirements for management of primary water stress corrosion cracking (PWSCC) in nickel-alloy reactor vessel head penetration (RVHP) locations, pressurizer locations, and other locations exposed to the reactor coolant environment.

This document contains one or more steps or sections that implement a Nuclear Regulatory Commission requirement or commitment to manage the effects of aging on systems, structures, and components within the scope of license renewal as described in Palisades Administrative Procedure 3.26, "Implementation of Palisades Renewed License Requirements," and Engineering Manual Procedure EM-32, "Renewed License Program - Aging Management Activities." The Renewed License commitment is designated "[RLC]".

2.0 SCOPE

The Nickel-Alloy Program is used to manage primary water stress corrosion cracking in 251 specific nickel-alloy components within the reactor coolant pressure boundary, including the reactor pressure vessel head. The program follows the guidelines provided by the Materials Reliability Program (MRP) to:

- a. Minimize the impact of PWSCC on plant safety and operation
- b. Ensure that regulatory requirements are met
- c. Develop and execute long-term strategies for managing primary water stress corrosion cracking in Alloy 600 base metal and Alloy 82/182 weld metal

The Nickel-Alloy Program does not include any nickel-alloy components other than the 251 specific locations identified in the Palisades 10-Year Interval Master Inservice Inspection Plan for Class 1, 2, 3, Risk-Informed, Defense-In-Depth and Augmented Examinations.

TITLE: NICKEL-ALLOY PROGRAM

2.1 DEFINITIONS

2.1.1 Nickel-Alloys

The term nickel-alloy refers to alloys which include Alloy 182, Alloy 600, Alloy 690, Gr. 688 (X-750), Inconel 182, Inconel 82, NiCrFe, SB-166, SB-167, SB-168, and X-750. The terms nickel-alloy and nickel-base alloy are used interchangeably.

2.1.2 Primary Water Stress Corrosion Cracking (PWSCC)

PWSCC is an intergranular cracking mechanism which is known to occur in the presence of high applied and/or residual stress, susceptible microstructures, and high temperature.

2.1.3 Component

Within the context of this procedure, the term component means one or more of the following 251 nickel-alloy locations described in detail in the Palisades 10-Year Interval Master Inservice Inspection Plan for Class 1, 2, 3, Risk-Informed, Defense-In-Depth and Augmented Examinations.

- 45 reactor vessel upper head control rod drive (CRD) penetration nozzles
- 8 reactor vessel upper head incore instrument penetration nozzles
- 1 reactor vent line penetration nozzle
- 2 reactor flange leak detector taps
- 1 pressurizer power-operated relief valve (PORV) nozzle safe end weld
- 1 pressurizer spray nozzle safe end
- 1 pressurizer surge line nozzle safe end
- 3 pressurizer safety and relief valve nozzle flanges
- 8 pressurizer level nozzles
- 2 pressurizer temperature element nozzle penetrations
- 120 pressurizer heater sleeves
- 4 primary coolant piping safety injection nozzle safe ends
- 1 primary coolant piping shutdown cooling outlet nozzle safe end
- 1 primary coolant piping surge line nozzle safe end
- 22 temperature measurement nozzles
- 1 hot leg drain nozzle
- 4 cold leg drain nozzles
- 18 pressure measurement and sampling nozzles
- 2 primary coolant piping spray nozzles
- 2 primary coolant piping charging inlet nozzles
- 4 steam generator (SG) primary bowl plugs

TITLE: NICKEL-ALLOY PROGRAM

3.0 REFERENCES

3.1 SOURCE DOCUMENTS

- 3.1.1 NEI 03-08, "Guideline for the Management of Materials Issues"
- 3.1.2 EPRI 1009561, "Materials Reliability Program: Generic Guidance for Alloy 600 Management (MRP-126)", Final Report, November 2004
- 3.1.3 NUREG-1801, "Generic Aging Lessons Learned (GALL) Report," Revision 0
- 3.1.4 Palisades Application for Renewed Operating License, March 22, 2005
- 3.1.5 NUREG-1801, "Generic Aging Lessons Learned (GALL) Report," Revision 1
- 3.1.6 NRC Letter to Paul Harden dated September 28, 2006, "Safety Evaluation Report Related to the License Renewal of Palisades Nuclear Plant"
- 3.1.7 Order EA 03-009, Issuance of Order Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors, February 11, 2003
- 3.1.8 First Revised Order EA-03-009, Issuance of Revised Order EA-03-009 Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors, February 20, 2004
- 3.1.9 Palisades Plant Response to Revised NRC Order EA-03-009, "Issuance of First Revised NRC Order Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors" (dated 3/8/04)
- 3.1.10 Palisades Plant "60-Day Report Per First Revised Order EA-03-009" – fall 2004 refueling outage reactor pressure vessel head visual inspection and NDE of head penetrations (dated 1/13/2005)
- 3.1.11 Letter from Dan J. Malone to the USNRC dated July 26, 2004, 60-Day Response to Bulletin 2004-01, "Inspection of Alloy 82/182/600 Materials Used in the Fabrication of Pressurizer Penetrations and Steam Space Piping Connections at Pressurized-Water Reactors"

TITLE: NICKEL-ALLOY PROGRAM

3.2 REFERENCE DOCUMENTS

- 3.2.1 Palisades Administrative Procedure 3.26, "Implementation of Palisades Renewed License Requirements"
- 3.2.2 Engineering Manual Procedure EM-32, "Renewed License Program - Aging Management Activities"
- 3.2.3 Palisades 10-Year Interval Master Inservice Inspection Plan for Class 1, 2, 3, Risk-Informed, Defense-In-Depth and Augmented Examinations
- 3.2.4 Material Reliability Program: Primary System Piping Butt Weld Inspection and Evaluation Guideline (MRP-139), EPRI, Palo Alto, CA: 2005. 1010087
- 3.2.5 NRC Bulletin 2002-01, "Reactor Pressure Vessel Head Degradation and Reactor Coolant Pressure Boundary Integrity"
- 3.2.6 Regulatory Guide 1.147, Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1
- 3.2.7 Engineering Manual Procedure EM-09-03, "Inservice Inspection"
- 3.2.8 Palisades Plant 60-Day Response to Bulletin 2002-01, "Reactor Pressure Vessel Head Degradation and Reactor Coolant Pressure Boundary Integrity" Request for Additional Information (TAC No MB4562) (dated 1/20/03)
- 3.2.9 Letter from R. Barrett, NRC Office of Nuclear Reactor Regulation (NRR), Division of Engineering to Alex Marion, Nuclear Energy Institute, Flaw Evaluation Guidelines, April 11, 2003 (ADAMS Accession Nos ML030980322 and ML030980333)
- 3.2.10 NMC Fleet Procedure FP-PA-ARP-01, "CAP Action Request Process"
- 3.2.11 NMC Fleet Procedure FP-E-CAL-01, "Calculations"
- 3.2.12 NMC Fleet Procedure FP-G-DOC-04, "Procedure Processing"
- 3.2.13 NMC Fleet Procedure FP-G-RM-01, "Records Management"

3.3 COMMITMENTS

- 3.3.1 RLC 01038635-01, "Update Alloy 600 Program"

TITLE: NICKEL-ALLOY PROGRAM

4.0 RESPONSIBILITIES AND ADMINISTRATION

The overall responsibility for development, revision, and implementation of the Nickel-Alloy Program resides with the Program Engineering Department. Responsibilities of the various groups contained therein are described below.

4.1 PROGRAMS ENGINEERING

- Preparation, maintenance and ownership of the Nickel-Alloy Program
- Development of refueling outage examination plans
- Development of a recommended strategy for the management of Alloy 600/82/182 materials
- Ensuring compliance with regulatory requirements
- Serving as the Palisades contact for outside technical communications (NEI, INPO, NRC, EPRI/MRP, ASME, PWR Owners Group, etc)
- Participating in industry owners groups
- Providing analysis and response to significant industry events
- Preparing periodic program health reports
- Conducting periodic self-assessments of the Nickel-Alloy Program

4.2 PLANT ENGINEERING

- Preparation of Design Change Packages (DCP) for repairs or modifications that would result in a configuration change to existing Alloy 600/82/182 components
- Disposition of Condition Reports associated with examination results

4.3 SITE MAINTENANCE AND PROJECTS

- Performance of work orders for the implementation of examination, evaluation, mitigation, and repair/replacement activities

TITLE: NICKEL-ALLOY PROGRAM

4.4 ADMINISTRATIVE CONTROLS

4.4.1 Program Development and Maintenance

The Nickel-Alloy Program scope, examination methods, examination frequencies, and other inspection requirements shall be contained in the 10-Year Master Inservice Inspection Plan. The Inservice Inspection Technical Lead provides the necessary code expertise, drawings, and examination tables as required by Engineering Manual Procedure EM-09-03, "Inservice Inspection."

4.4.2 Requests for Relief from the Provisions of Section XI

If necessary, the Inservice Inspection Technical Lead shall prepare and submit relief requests, alternative positions, or hardship requests related to nickel-alloy components in accordance with EM-09-03.

4.4.3 ISI Master Plan Updates

When required, the Inservice Inspection Technical Lead shall prepare and submit the applicable 10-Year Master Inservice Inspection Plan updates for nickel-alloy components in accordance with EM-09-03.

4.4.4 Program Revision

The Inservice Inspection Technical Lead shall maintain the Nickel-Alloy Program through periodic review and correction consistent with the directions provided in EM-09-03. Revision of this program shall require the same reviews and approvals as the original document.

4.4.5 Program Continuity

The Inservice Inspection Technical Lead shall ensure that at least one other additional person is familiar with the Palisades Nickel-Alloy Program and that individuals involved are adequately trained.

4.4.6 Program Engineering

The Inservice Inspection Technical Lead shall provide engineering expertise as delineated in EM-09-03.

TITLE: NICKEL-ALLOY PROGRAM

4.5 PLANT AND INDUSTRY OPERATING EXPERIENCE

The Inservice Inspection Technical Lead shall identify any additional nickel-alloy components based upon industry experience that may be applicable to Palisades. These components shall be included in the examination scope.

5.0 PROGRAM REQUIREMENTS

The NRC has been considering various regulatory options to address this issue. The industry continues to work through the ERPI MRP to develop a nickel-alloy program acceptable to the NRC. The evolution of the requirements has been largely aimed at RVHP and pressurizer penetrations, but the requirements differ little for the remaining nickel-alloy locations within the scope of the program.

The Inservice Inspection Technical Lead will continue to follow nickel-base alloy issues and requirements as they evolve, and will update the program accordingly. For example, the program scope will change with the installation of the new head because the RVHP will be Alloy 690. In the interim, the program will be based on the latest regulatory requirements, operating experience, inservice inspection results, and the latest body of industry knowledge.

5.1 PROGRAM COMMITMENTS

5.1.1 Renewed License Commitment

A commitment to revise our program to be consistent with latest NRC requirements and industry commitments was required by the NRC as part of obtaining the renewed Operating License (OL). The specific commitment for the renewed OL is provided below.

Palisades will revise the Alloy 600 Program to update the PWSCC growth rate assessments and inspection program consistent with the latest NRC requirements and industry commitments (e.g., EPRI Report 1010087 "Materials Reliability Program: Primary System Piping System Butt Weld Inspection and Evaluation Guidelines [MRP-139]," (August 2005)). The updated program will be submitted for NRC review and approval by March 24, 2008.
COMM 01038635-01 [RLC]

5.1.2 Other Commitments

Commitments which were made prior to the renewed operating license may be found in the 10-Year Master Inservice Inspection Plan.

TITLE: NICKEL-ALLOY PROGRAM

5.2 KEY PROGRAM ELEMENTS

The key elements of the Palisades Nickel-Alloy Program are 1) identification of susceptible component locations, 2) prioritization of those locations for examination/inspection (component ranking), and 3) mitigation, detection, and repair of PWSCC in nickel-alloy components.

5.2.1 Identification of Susceptible Locations

The 251 specific nickel-alloy locations are described in the Palisades 10-Year Interval Master Inservice Inspection Plan for Class 1, 2, 3, Risk-Informed, Defense-In-Depth and Augmented Examinations. This list of Alloy 600/82/182 locations was provided to the NRC as part of the 60-day response to NRC Bulletin 2002-01, "Reactor Pressure Vessel Head Degradation and Reactor Coolant Pressure Boundary Integrity."

5.2.2 Component Ranking

As a result of Alloy 600 cracking issues associated with the PORV nozzle, a project was initiated in 1993 to identify and rank all nickel-alloy locations contained within the PCS. This project ranked all 251 locations based on four main criteria: PWSCC susceptibility, failure consequence, leakage detection margin, and radiation dose rates.

The Inservice Inspection Technical Lead will provide category definitions based on several factors, which include, but may not be limited to:

- a. whether the material is resistant to PWSCC
- b. whether inspection has already been performed
- c. whether the weld is cracked or not
- d. whether a weldments has undergone a mitigation process
- e. the pipe size
- f. the temperature at the location

TITLE: NICKEL-ALLOY PROGRAM

5.2.3 Mitigation

Plant design provides some reduced susceptibility to PWSCC because this mechanism is highly dependent on elevated temperature and the Palisades pressurizer operates about 10°F below the industry average for PWRs. Palisades also follows the EPRI guidelines for primary water chemistry which further serves to reduce PWSCC susceptibility. Finally, engineering efforts such as the mechanical stress improvement process (MSIP) have been applied at several nickel alloy locations. Details are contained in the Palisades 10-Year Interval Master Inservice Inspection Plan for Class 1, 2, 3, Risk-Informed, Defense-In-Depth and Augmented Examinations.

The Inservice Inspection Technical Lead will assist in development, evaluation and implementation of new mitigation options which may arise, such as those identified through future research or those that may be recommended by the MRP.

5.2.4 Detection

Detection of cracking (including PWSCC) will be accomplished through a combination of bare-metal visual examination and/or non-visual examination techniques as identified in the Palisades 10-Year Interval Master Inservice Inspection Plan for Class 1, 2, 3, Risk-Informed, Defense-In-Depth and Augmented Examinations. Bare-metal visual examinations may be used to detect reactor coolant leakage from the RVHP nozzles or their associated J-groove welds and for any loss of material that may be induced as a result of boric-acid wastage. Non-visual examination techniques may be used to detect these aging effects and may be performed using either surface examination techniques (eddy current or penetrant testing) or volumetric examination techniques (ultrasonic testing).

5.2.5 Repair or Replacement

Repair and replacement procedures and activities will either comply with ASME Section XI, as invoked by the requirements of 10 CFR 50.55a, or will conform to applicable ASME Code Cases that have been endorsed in 10 CFR 50.55a by reference in the latest version of NRC Regulatory Guide 1.147.

Alternative repair/replacement activities in lieu of those endorsed by the NRC in either Section XI or NRC-approved Code Cases will be sent to the NRC for approval in accordance with either the acceptable alternative provisions of 10 CFR 50.55a(a)(3)(i) or the hardship provisions of 10 CFR 50.55a(a)(3)(ii).

TITLE: NICKEL-ALLOY PROGRAM

5.3 EXAMINATION REQUIREMENTS

5.3.1 Examination Methods and Frequency

The type and frequency of examinations will be dependent upon the component being examined. The examination methods and frequencies for the 251 nickel- alloy components within the scope of the program are maintained in the Palisades 10-Year Interval Master Inservice Inspection Plan for Class 1, 2, 3, Risk-Informed, Defense-In-Depth and Augmented Examinations.

5.3.2 Examination Agency Project Plan

The examination agencies may, with Palisades ISI approval, prepare and submit a project plan to monitor and implement their onsite activities. This will be done in accordance with EM-09-03.

5.3.3 Examination Procedures

The Inservice Inspection Technical Lead will determine the appropriate procedures to be used for examination. Reviews and approvals for these procedures shall be completed as identified in Attachment 1 to EM-09-03.

5.3.4 Inspection Activities

The Inservice Inspection Technical Lead shall administer the ISI Specification and coordinate examination agencies, the Authorized Nuclear Inservice Inspector, State and NRC activities. As work progresses, the Inservice Inspection Technical Lead compiles and reviews data to provide engineering justifications and recommended dispositions of reportable indications. The Inservice Inspection Technical Lead will initiate changes necessary to facilitate performing additional examinations or reexaminations.

5.3.5 Audits or Assessments

Findings that result from audits conducted by the Authorized Nuclear Inservice Inspector, NRC, or any designated audit or assessment group, shall be dispositioned in accordance with NMC Fleet Procedure FP-PA-ARP-01, "CAP Action Request Process."

TITLE: NICKEL-ALLOY PROGRAM

5.3.6 Reportable Indications

Any indications which exceed the acceptance criteria and cannot be resolved by the examination agency as non-relevant will be documented by the Inservice Inspection Technical Lead in accordance with FP-PA-ARP-01 describing indication resolution, disposition instructions, action taken, and the results of any re-examination. Indications considered non-relevant will also be adequately documented by the examination agency on a data sheet or other document which becomes part of the ISI record.

5.3.7 Evaluation of Indications

Relevant flaw indications detected as a result of the augmented inspections of RVHP nozzles are to be evaluated in accordance with acceptable flaw evaluation criteria provided in a letter from Mr. Richard Barrett, NRC, Office of Nuclear Reactor Regulation (NRR), Division of Engineering, to Alex Marion, Nuclear Energy Institute (NEI), dated April 11, 2003, or in accordance with NRC-approved Code Cases that incorporate the flaw evaluation procedures and criteria of the NRC's April 11, 2003, letter to NEI. Note that flaw growth may be attributable to stress corrosion cracking, fatigue cracking, or some combination thereof.

The Inservice Inspection Technical Lead shall be responsible for coordinating the characterization and evaluation of all surface and volumetric indications that exceed the applicable acceptance standards of IWB, IWC, IWD, and IWF-3000 as applicable and documenting the item on an Action Request in accordance with FP-PA-ARP-01. The engineering evaluations of the indications are performed by the Inservice Inspection Technical Lead, other members of the Plant staff or outside contractor(s). Any engineering evaluation performed shall be in accordance with NMC Fleet Procedure FP-E-CAL-01, "Calculations," and shall be reviewed by the Inservice Inspection Technical Lead for inclusion into the ISI Record.

5.3.8 Disposition of Indications

The Inservice Inspection Technical Lead will disposition reportable indications by determining whether adequate engineering justification exists to return the Plant to service without repair, or if a repair must be made. Where conflicts arise in the evaluations or recommended disposition of indications, the Inservice Inspection Technical Lead shall refer them to the Engineering Programs Manager for final review and determination of the course of action to be followed.

Relevant flaw indications in the RVHP nozzles or their associated nickel-alloy J-groove weld materials will be considered unacceptable for further service and will be corrected through implementation of appropriate repair or replacement activities directed by the Inservice Inspection Technical Lead, and the component category will be changed appropriately.

TITLE: NICKEL-ALLOY PROGRAM

5.3.9 Administrative Anomalies

Deviations related to inservice inspection activities other than indication evaluation are resolved by the Inservice Inspection Technical Lead. Scheduled items which cannot be examined due to design, configuration, or other condition will be documented by the Inservice Inspection Technical Lead as an exam table change, with appropriate justification.

6.0 ATTACHMENTS AND RECORDS

6.1 ATTACHMENTS

None

6.2 RECORDS

Program records will be prepared, reviewed and approved in accordance with the requirements set forth in Engineering Manual Procedure EM-09-03. Records generated shall be filed in accordance NMC Fleet Procedure FP-G-RM-01, "Records Management."

7.0 SPECIAL REVIEWS

The scope of this procedure does not include activities that require a 50.59 review per NMC Fleet Procedure FP-G-DOC-04, "Procedure Processing." Therefore, changes to this procedure do not require a 50.59 review.