

*Technical Report MRP-169
Weld Overlay on Alloy 82/182
Dissimilar Metal Butt Welds*

US Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of Component Integrity
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NRC Staff Approach

- NRC staff prefers to review a plant-specific optimized weld overlay (OWOL) before approving the MRP-169 topical report
 - It is an essential part of NRC review to perform confirmatory calculations on actual welds
 - As of now, we do not have a plant-specific OWOL relief request
 - We raised this concern in our prior meeting and expected to receive plant-specific data on a plant discussed at that meeting
- Also, NRC staff considers that progress on our review of MRP-169 is subject to our understanding and resolution of the examination qualification issues regarding OWOL

NRC Staff Approach (cont'd)

- An additional perspective on NDE is that for OWOLs
 - The design basis assumes the integrity of the outer 25% of the original weld; design basis flaw is 75% through wall.
 - It is not clear how the design basis assumption can be verified without knowing the reliability of detecting flaws in the outer 25% of the wall. It doesn't seem appropriate to assume there is a high POD for the UT performed to verify this design basis assumption

NRC Review Schedule

- Submit revised MRP-169 including the resolutions to open issues, such as data to perform confirmatory analyses, as soon as possible but no later than 6/1/2009
- Industry interest in implementing OWOLs may supersede this schedule