PrairieIslandNPEm Resource

From: Eckholt, Gene F. [Gene.Eckholt@xenuclear.com]
Sent: Friday, August 14, 2009 2:18 PM
To: Plasse, Richard
Subject: Reactor Vessel Internals

Rick

Here are preliminary responses.

1. Documentation of inspection results will be in accordance with approved inspection procedures. All necessary program implementing documents, including inspection procedures, will be developed in accordance with the NSPM Quality Assurance Program, which implements the requirements of 10 CFR Part 50, Appendix B.

2.a. As stated in the "Scope of Program" element, "The scope does not include consumable items such as fuel assemblies, reactivity control assemblies, and nuclear instrumentation." Fuel assemblies are periodically replaced (i.e., short-lived), and therefore not subject to aging management review. Reactivity control assemblies are active components, and therefore not subject to aging management review. Nuclear instrumentation (i.e., incore neutron flux detectors) are active electrical components, and therefore not subject to aging management review.

2.b. As stated in the "Scope of Program" element, "The scope also does not include welded attachments to the reactor vessel." Welded attachments to the reactor vessel interior are subject to examination in accordance with the ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD Program. The IWB, IWC and IWD Program conducts visual inspection of the accessible interior attachment welds per ASME Section XI, Table IWB-2500-1, Examination Category B-N-2, Welded Core Support Structures and Interior Attachments to Reactor Vessels.

3. The PINGP PWR Vessel Internals Program is based on the inspection guidance provided in MRP-227, as approved by the NRC, and the ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD Program. MRP-227 is based upon industry operating experience, research data, and vendor evaluations. The examination methods, coverage, and schedule prescribed in MRP-227 account for both domestic and international reactor vessel internals aging experience. Industry operating experience related to the aging degradation of PWR vessel internals is described in the "Operating Experience" program element. Through participation in EPRI MRP activities, the PINGP PWR Vessel Internals Program will continue to evolve as additional inspection experience is gained.

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