

NRCREP Resource

Subject: FW: Comments on Draft Regulatory Guides DG-1221 and DG-1224

From: Vicki Hull [mailto:vicki.hull@dom.com]
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To: NRCREP Resource
Subject: Comments on Draft Regulatory Guides DG-1221 and DG-1224

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Dominion's Materials and Inspection dept are providing comments on these two RG's.

3

1. DG-1221

Control of Stainless Steel Weld Cladding of Low-Alloy Steel Components
Comments: Page 3, 2nd Paragraph: "Welding processes known to induce underclad cracking, such as the high-heat-input processes indicated above, should not be used for cladding material susceptible to underclad cracking, ..." It's not the cladding material that is susceptible. I think there is a phrase missing. It should read: "Welding processes known to induce underclad cracking, such as the high-heat-input processes indicated above, should not be used for cladding **any grade of** material susceptible to underclad cracking, ..."

2. DG-1224

Control of the Processing and Use of Stainless Steel
Comments: A. Page 2, second sentence in part B under Discussion. There should be some distinction between intergranular stress-corrosion cracking (SCC) and transgranular SCC. Sensitization plays no role in transgranular SCC.

B. Page 3, 3rd Full Paragraph: Chloride, Fluoride, and Oxygen levels are consistent with UFSAR.

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