Regulatory Requirements for Weld Overlays on LBB Locations

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Comments

- Will you consider noticing a draft of the RIS in the Federal Register for public comment? Industry has not had sufficient time to review the RIS and develop comments.
- We agree that the issue does not affect weld onlays, inlays, and MSIP
- RIS section 8 suggests the need for an industry approach to this issue. We agree.

Comments

- Clarify the meaning of the word “margins” as used in the RIS (slides 7 through 9)
  - Has the RIS effectively changed the Staff’s interpretation of the rule as described in the SRP? (bullet 2, slide 9)
  - Several existing LBB analyses identified limiting locations based on stress and material properties

Comments

- RIS states that an overlay invalidates or makes the analysis obsolete. Please elaborate.
  - The entire analysis or only parts of it?
  - Bullet 1 on slide 10 implies that every weld in a system approved for LBB will need to be analyzed. The original analysis was not necessarily performed that way.
  - Bullet 3 on slide 10 states that the LBB analysis for WOs is a departure from original LBB methodology. This assumes a specific methodology for how the LBB analysis should be done – not all were done the same way. Please explain
  - Existing analysis may be bounding

Comments

- Similar to other mitigation methods, weld overlays also mitigate SCC. If SCC is mitigated, the LBB analysis for an overlay should not have to assume SCC . This would allow licensees to use the original LBB method and crack assumptions; therefore resulting in no change in methodology.
  - Furthermore, weld overlays provide two methods of mitigation

Comments

- Slide 12 states that this issue is a compliance backfit which seems to be a new interpretation of the regulation. Please explain.
- What licensing or enforcement discretion process will the Staff use if we need an emergent weld overlay assuming a LAR is required as stated in the RIS?

Comments

- The RIS (item 9) states that the change in crack morphology (an input parameter) is a change in methodology. Please elaborate.
- When will Davis Besse's LAR be approved and will it be a generic approval?
  - Will changes in input parameters (like leakage detection threshold) be allowed or will this be considered a change in methodology?

Other Comments

- The RIS states that ASME Sections III and XI do not contain rules for weld overlays, inlays and onlays. We believe that a public meeting on Sept 8 resolved this question
- The RIS states that "critical locations generally include the locations that have the least favorable combination of stress and materials properties…". That interpretation does not seem to be reflected in the SRP.