

2010-056 \_\_\_\_\_ BWR Vessel & Internals Project (BWRVIP)

February 26, 2010

Document Control Desk  
U. S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852

Attention: Michael McCoppin

Subject: Project No. 704 – BWRVIP Response to NRC Request for Additional Information  
on BWRVIP-34-A

Reference: Letter from Michael D. McCoppin (NRC) to Rick Libra (BWRVIP Chairman),  
“Request for Additional Information (RAI) RE: Boiling Water Reactor Vessel  
Internals Project Topical Report BWRVIP-34-A, Technical Basis for Part  
Circumference Weld Overlay Repair of Vessel Internal Core Spray Piping (TAC  
NO. ME2301),” dated January 21, 2010.

Enclosed are five (5) copies of the BWRVIP response to the NRC Request for Additional  
Information (RAI) on the BWRVIP report entitled “BWRVIP-34-A: BWR Vessel and Internals  
Project, Technical Basis for Part Circumference Weld Overlay Repair of Vessel Internal Core  
Spray Piping,” that was transmitted to the BWRVIP by the NRC letter referenced above.

If you have any questions on this subject please call Denver Atwood (Southern Nuclear,  
BWRVIP Repair Focus Group Chairman) at 205.992.7461.

Sincerely,



Rick Libra  
Exelon  
Chairman, BWR Vessel and Internals Project

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**BWRVIP Response to NRC Request for Information (RAI) on “BWRVIP-34-A: BWR Vessel and Internals Project, Technical Basis for Part Circumference Weld Overlay Repair of Vessel Internal Core Spray Piping”**

The NRC Request for Information is repeated below verbatim, followed by the BWRVIP Response:

**Question pertaining to Section 7 Revision**

The revision to Section 7 included a requirement to ensure that weld overlay repair design length and thickness must be adequate to inspect the weld overlay repair, if inspection is required. The staff noted that this requirement was not included in Sections 3.3 and 3.4 which address the design considerations for weld repair overlay length and thickness. This omission has the potential to create confusion during the design process. Please explain why this information was omitted from Sections 3.3 and 3.4 while being included in Section 7.

**BWRVIP Response**

The BWRVIP agrees that it is important to recognize that inclusion of additional length to allow adequate inspections to be performed is an important part of the design activity, which is the subject of Section 3. The approach taken was to add the specific discussion related to additional length in Section 7 (Inspection) and to add the following note to the introduction of Section 3:

*Note: This section describes methods for determining the weld overlay length and thickness required to meet structural criteria. Additional length and width may be required in order to allow satisfactory UT inspections to be performed. Considerations related to inspection are discussed on Section 7.*

While, in retrospect, the staff's suggestion of including the specific words in Section 3 may have been a better approach, the BWRVIP believes that the current form of the report will ensure that all applicable design requirements will be met. Should the report require revision at some future date, the BWRVIP will consider moving the applicable text from Section 7 into Section 3.