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W3F1-2010-0033

April 29, 2010

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

**SUBJECT:** Response to NRC Request for Additional Information Re: Waterford Steam Electric Station, Unit 3 - Requests for Relief WF3-ISI-007, 008, 009, 010, 011, 012, 013, and 014  
Waterford Steam Electric Station, Unit 3  
Docket No. 50-382  
License No. NPF-38

**REFERENCES:** 1 Electronic communication dated March 23, 2010, "Waterford, Unit 3 - Request for Additional Information Round 2, Relief Request Nos. WF3-ISI-007 to WF3-ISI-014 from ASME Code, Section XI Volumetric Examination Requirements - Second 10-Year Interval" (ADAMS Accession No. ML100820355)

2 Entergy Letter W3F1-2010-0029 dated April 8, 2010 "Response to NRC Request for Additional Information Re: Waterford Steam Electric Station, Unit 3 - Requests for Relief WF3-ISI-007, 008, 009, 010, 011, 012, 013, and 014"

Dear Sir or Madam:

On March 23, 2010, Entergy received communication [Reference 1] from the NRC Staff requesting additional information associated with Entergy's relief requests from ASME Section XI Volumetric Examination Requirements – Second 10-Year Inservice Inspection Interval (Reference 1).

By letter W3F1-2010-0029, dated April 8, 2010 [Reference 2], Entergy provided the response to NRC's request for additional information. Attachment 2 to this letter had, in addition to the cover sheet, 3 pages, which were numbered as 2 of 4, 3 of 4 and 4 of 4, that gave the appearance that the first page of the attachment was missing.

Entergy is re-submitting the response the NRC's request for additional information to clearly indicate the page numbers applicable to Attachment 2, namely 1 of 3, 2 of 3, and 3 of 3. This submittal eliminates the page-numbering discrepancy between Attachments 1 and 2.

ADD  
NRK

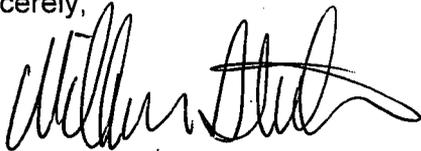
Additionally, this letter withdraws the relief requests for the Examination Category B-J, item number B9.21 welds.

Attachments 1 and 2 contain Entergy's response to the NRC request:

There are no new commitments contained in this letter.

If you have any questions or require additional information, please contact me at 504-739-6685.

Sincerely,

A handwritten signature in black ink, appearing to be "William A. ...". The signature is fluid and cursive, with a long horizontal stroke at the end.

WJS/RJP/ssf

Attachments:

1. Entergy's response to NRC information request
2. Entergy's response to NRC information request – Surface Examination Dates Prior to Approval of Code Case N-663

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**Attachment 1  
To  
W3F1-2010-0033**

**Response to NRC Request for Additional Information Re: Waterford Steam Electric  
Station, Unit 3 - Requests for Relief WF3-ISI-007, 008, 009, 010, 011, 012, 013, and 014**

**Entergy's Response to NRC Information Request**

## Response to Request for Additional Information

The original request is provided for reference and is followed by Waterford 3's response.

### Applicable ASME Code Edition/Addenda

The ASME Code Edition/Addenda that was applied during the second ISI interval at WF-3 remains unclear. The original submittal lists the 1992E/93A as the Code of record, but also states that WF-3 used the 1980E/W81A for ultrasonic examinations. In a response to the second NRC RAI, the licensee stated:

*The NRC authorized Waterford 3 (Reference GNRI 96-00244) to perform ultrasonic examinations in accordance with the 1980 Edition with the Winter of 1981 Addenda as specified in the ISI plan for the first interval. The use of the 1980 Edition with the Winter of 1981 Addenda was limited until such time when changes to 10 CFR 50.55a required the use of ASME Section XI, Appendix VIII.*

*A teleconference was held between the NRC and Waterford on 3/22/2010 to discuss the relief requests that Waterford submitted for the Second 10-Year ISI Interval. Waterford provided a copy of GNRI 96-00244 to the NRC as an action from this teleconference. The GNRI 96-00244 allowed Waterford to use the ASME Section XI 1980 Edition with the Winter of 1981 Addenda for ultrasonic examinations.*

### Surface Examinations

- The licensee received approval to use ASME Code Case N-663 (ML032390190 – August 26, 2003) which allows foregoing of required surface examinations after an evaluation for OD surface degradation is completed. For examination categories B-F, B-J, and C-F-1, the licensee may have performed some of the ISI examinations prior to this approval, and appears that the licensee did not perform the Code-required surface examinations at that time. The licensee needs to discuss this issue and confirm whether the required surface examinations were performed. The licensee should also confirm whether the examination dates provided in the specific RAI response (February 8, 2010), are correct and apply only to the volumetric examinations.

**Response:** *The dates provided in the RAI response (February 8, 2010) are correct and apply only to the volumetric examinations. Per Waterford's conversation with the NRC, Attachment 2 of this response references the surface exam dates which correspond to the volumetric exams prior to Waterford's approval to utilize ASME Code Case N-663.*

- RR WF3-ISI-010: ASME 1992E/93A, B-J Examination Category, Item B9.21, only requires surface examination on circumferential welds less than NPS 4-inch. The licensee performed a surface examination (liquid penetrant) on drain nozzle-to-safe end Weld 15-006. However, it appears the licensee is requesting relief for the volumetric examination of Weld 15-006, which is not required by the Code. Please confirm that volumetric examination is not required for Weld 15-006, and clarify the specific relief that is being requested.

**Response:** A surface exam (liquid penetrant) was performed on Weld 15-006 along with a volumetric exam. The volumetric exam was performed as an Augmented Inspection (IE Bulletin 88-08) and was not required by Section XI. Relief for weld 15-006 is not required and therefore is withdrawn from this relief request. Similarly, none of the twenty-six Examination Category B-J, Item No. B9.21 welds (itemized on page 2 of 3 in Attachment 2) require a volumetric exam and are therefore withdrawn from this relief request. Condition Report CR-WF3-2010-02224 has been initiated to document this inaccuracy contained in the original submittal and the RAI dated February 8, 2010.

- **RR WF3-ISI-012:** For Examination Category C-B, Item C2.21, the date of volumetric examination for nozzle-to-top head dome Weld 04-030 was listed as April 30, 2005. However, the licensee stated that the ASME Code-required surface examination was missed, and this discrepancy was documented in a corrective action letter, CR-WF3-2010-0352. Please explain why the required surface examination was missed, whether the NRC was notified, and if so, provide a reference and accession number for this notification. In addition, state when the next scheduled surface examination will be made for the subject weld.

**Response:** This missed surface exam was identified during the development of W3F1-2010-0014. (Response to NRC request for additional information dated January 6, 2010 for RR WF3-ISI-012) Condition report CR-WF3-2010-352 was initiated due to this missed surface exam. As part of the corrective action process, it was determined that this missed exam was not reportable, therefore the NRC was not notified. Weld 04-030 will be replaced next outage during the Replacement Steam Generator. A copy of the condition report (CR-WF3-2010-352) was provided to the NRC on 3/22/2010.

#### Application of ASME Appendix VIII

- For Examination Category B-F welds included in RR WF3-ISI-009, the licensee's submittal dated June 1, 2009, states that Appendix VIII procedures, personnel and equipment were used. However, in the specific RAI response dated February 8, 2010, the subject welds examinations show using ASME requirements at the time of the examination (November 5 and 6, 2000), which were not Appendix VIII-based. Please confirm the examination dates and the ASME Code requirements used to perform the volumetric examinations on the subject Class 1 dissimilar metal welds.

**Response:** Waterford's initial submittal (June 1, 2009) stated, in error, that all Examination Category B-F volumetric exams were performed in accordance with Appendix VIII procedures, personnel and equipment. The dates are correct in the RAI response dated February 8, 2010 and Appendix VIII did not apply to the requested components. ASME Section XI, 1980 with W81 Addenda was used for these examinations. Condition Report CR-WF3-2010-02224 has been initiated to document this inaccuracy contained in the original submittal. There were No surface exams performed under Category B-F due to Code Case N-663. Even though the volumetric exams were performed in 2000, prior to Code Case N-663, Waterford did not take credit for these exams until after the approval of the Code Case. Waterford met all the code percentage requirements within the periods.

- For Examination Category C-A welds in RR WF3-ISI-011, the licensee's submittal letter dated June 1, 2009, references "Class 1 piping....," which doesn't apply to the

subject Class 2 welds (see Table 4 below). In addition, the licensee submittal states that the subject welds were examined after November 22, 2002; hence Appendix VIII-based methods were used. However, the examination dates provided in the specific RAI response dated February 8, 2010; don't agree with the original licensee submittal. It is noted that Appendix VIII requirements do not apply for any of these welds. Please clarify the dates and requirements used to perform the subject Class 2 weld examinations listed in Table 1.

**Response:** Waterford's initial submittal (June 1, 2009) stated, in error, that all Examination Category C-A volumetric exams were performed in accordance with Appendix VIII procedures, personnel and equipment. Appendix VIII does not apply to Category C-A welds. The below dates in Table 1 are verified to be correct and ASME Section XI, 1980 with W81 Addenda was used for these examinations. Condition Report CR-WF3-2010-02224 has been initiated to document this inaccuracy contained in the original submittal.

Code Item	Weld Identifier	Weld Type	ASME Coverage Obtained	Examination Date
C1.10	04-026	SG Intermediate Shell to Conical Shell Weld	56%	3/03/1999
C1.20	04-029	SG#2 Top Head Torus to Top Head Dome Weld	89%	4/29/2005
C1.20	54-074	Shut Down Heat Exchanger Shell to Flange Weld	88%	9/04/2007
C1.20	54-075	Shut Down Heat Exchanger Shell to Flange Weld	85%	9/04/2007

- Similarly, for Examination Category C-B Weld 04-030 in RR WF3-ISI-012, the licensee's submittal letter dated June 1, 2009, references "Class 1 piping....," which doesn't apply to the subject Class 2 weld. In addition, the licensee submittal states that the subject weld was examined after November 22, 2002; hence Appendix VIII-based methods were used. However, the examination date of April 30, 2005, provided in the specific RAI response dated February 8, 2010, does not agree with the original licensee submittal. It is noted that Appendix VIII requirements do not apply for this weld. Please clarify the dates and requirements used to perform the subject Class 2 Weld 04-030 examination listed.

**Response:** The date of the ultrasonic examination for 04-030 was 4/30/2005. ASME Section XI, 1980 with W81 Addenda was used for this examination. Waterford's initial submittal (June 1, 2009) stated, in error, that all Examination Category C-B volumetric exams were performed in accordance with Appendix VIII procedures, personnel and equipment. Appendix VIII does not apply to Category C-B welds. Condition Report CR-WF3-2010-02224 has been initiated to document this inaccuracy contained in the original submittal.

- Similarly, in RR WF3-ISI-013 for Examination Category C-F-1 piping welds, the licensee's original submittal states examinations for these welds used Appendix VIII. However, the examination date and requirements provided in the specific RAI response, provides an examination date of March 2, 1999 for Weld 55-051. Please clarify the date and requirements used to perform the subject Class 2 piping weld examination.

**Response:** *The date of the ultrasonic examination for 55-051 was 3/2/1999. ASME Section XI, 1980 with W81 Addenda was used for this examination. Waterford's initial submittal (June 1, 2009) stated, in error, that the volumetric exam for Weld 55-051 was performed in accordance with Appendix VIII procedures, personnel and equipment. Based on this examination date, Appendix VIII did not apply to this weld. Condition Report CR-WF3-2010-02224 has been initiated to document this inaccuracy contained in the original submittal.*

#### Miscellaneous Items

- In RR WF3-ISI-013, for Examination Category C-F-1 piping welds, the licensee submittal and RAI response, dated June 1, 2009 and February 8, 2010, respectively, show a weld identification number as being 56-043. However, the initial RAI response, dated November 6, 2009, appears to show this as weld identification number of 54-043. Please clarify the correct weld identification number for the subject Class 2 piping weld.

**Response:** *The correct weld number is 54-043. Condition Report WF3-2010-02224 was initiated to document this inaccuracy contained in the original submittal and the RAI response dated February 8, 2010.*

- The scan angles used to perform the ultrasonic examinations for Weld 56-043 vary between values listed in the RAI response tables and those shown on the sketch. Please confirm the ultrasonic scan angles used to perform the volumetric examinations on Weld 56-043.

**Response:** *The correct weld number is 54-043. The following ultrasonic scan angles were used to perform the volumetric examinations on Weld 54-043: 45°, 70°, 60°RL*

- RR WF3-ISI-014: Even though this request for relief for Examination Category R-A, Risk-Informed Piping Examinations, was withdrawn by the licensee in the specific RAI response dated February 8, 2010, it should be noted that piping Weld 21-0004, listed in the initial RAI response dated November 6, 2009, was not included in the licensee's submittal.

**Response:** *Relief Request WF3-ISI-014 was withdrawn from the second interval relief requests. Weld 21-004 was not meant to be included in this relief request. Condition Report WF3-2010-02224 was initiated to document this inaccuracy in the RAI response dated November 6, 2009.*

- RR WF3-ISI-014: Please provide the NRC Safety Evaluation reference, date and ADAMS accession number for the licensee's use of ASME Code Case N-716, as a basis for Risk-Informed Piping Examinations at Waterford 3.

***Response:*** Relief Request WF3-ISI-014 was withdrawn from the second interval relief requests; however, the SE for Waterford's use of Code Case N-716 is dated April 28, 2008 and is in ADAMS Accession No. ML080980120.

**Attachment 2  
To  
W3F1-2010-0033**

**Response to NRC Request for Additional Information Re: Waterford Steam Electric  
Station, Unit 3 - Requests for Relief WF3-ISI-007, 008, 009, 010, 011, 012, 013, and 014**

**Surface Examination Dates  
Prior to approval of Code Case N-663**

Surface examinations dates added for components examined before the approval date of 8/23/2003 for use of Code Case N-663

<b>Limited B-J Examinations</b>					
<b><u>Item No.</u></b>	<b><u>Comp. ID</u></b>	<b><u>Item Description</u></b>	<b><u>% Coverage</u></b>	<b><u>Date examined/Code Year</u></b>	<b><u>Surface Examination Dates</u></b>
B9.11	06-006	14" Shutdown Cooling Nozzle to Safe end Weld	86.5%	10/27/2000- Code ASME Section XI Year 1995/96 A	10/25/2000
B9.11	07-013	RCS 30" Elbow to 45° Elbow Weld	82.2%	11/01/2003- Code ASME Section XI Year 1995/96 A	* 11/1/2003 See Note 1
B9.11	08-014	30" Pipe to Safe end Weld	71%	04/02/2002- Code ASME Section XI Year 1995/96 A	04/02/2002
B9.11	09-002	SG Nozzle Ext. Piece to 30" Elbow Ext. Piece Weld	87%	11/3/2003- Code ASME Section XI Year 1995/96 A	* 11/02/2003 See Note 1
B9.11	09-005	45° Elbow to 30" Elbow Weld	85%	11/3/2003- Code ASME Section XI Year 1995/96 A	* 11/02/2003 See Note 1
B9.11	09-016	30" Elbow to Safe end Weld (RCP 1B Inlet)	52.5%	11/02/2000- Code ASME Section XI Year 1995/96 A	10/29/2000
B9.11	09-017	30" Safe end to RCP 1B Weld	17.5%	11/02/2000- Code ASME Section XI Year 1995/96 A	10/29/2000
B9.11	10-001	RCP 1B to 30" Safe end Weld	18%	11/03/2000- Code ASME Section XI Year 1995/96 A	11/02/2000
B9.11	10-002	Safe end to 30" Pipe Weld (RCP 1B Outlet)	44.2%	11/03/2000- Code ASME Section XI Year 1995/96 A	11/02/2000
B9.11	13-001	SG#2 30" Nozzle to Nozzle Extension Weld	62.5%	11/06/2000- Code ASME Section XI Year 1995/96 A	11/05/2000
B9.11	17-033	12" Pipe to Reducer Weld	57%	03/28/2002- Code ASME Section XI Year 1995/96 A	03/28/2002
B9.11	19-006	12" Pipe to Valve Weld	50%	04/04/2002- Code ASME Section XI Year 1995/96 A	04/03/2002
B9.11	19-008	Valve end to 12" Pipe Weld	50%	11/6/2003- Code ASME Section XI Year 1995/96 A	* 11/05/2003 See Note 1
B9.11	21-066	14" Pipe to Valve Weld	50%	10/31/2000- Code ASME Section XI Year 1995/96 A	10/30/2000
B9.11	22-023	Elbow to 14" Pipe Weld	88%	10/26/2000- Code ASME Section XI Year 1995/96 A	10/25/2000
B9.11	25-009	4" Pipe to 4" x 4" x 3" Tee Weld	75%	10/22/2000- Code ASME Section XI Year 1995/96 A	10/20/2000
B9.11	25-015	4" x 4" x 3" Tee to 4" Pipe Weld	75%	11/02/2000- Code ASME Section XI Year 1995/96 A	11/02/2000
B9.11	25-016	4" Pipe to Valve end Weld	50%	10/22/2000- Code ASME Section XI Year 1995/96 A	10/20/2000
B9.11	25-018	Valve end to 4" Pipe Weld	50%	10/22/2000- Code ASME Section XI Year 1995/96 A	10/20/2000
B9.11	25-019	4" Pipe to Elbow weld	75%	10/22/2000- Code ASME Section XI Year 1995/96 A	10/20/2000
B9.11	25-020	Elbow to 4" Pipe Weld	75%	10/22/2000- Code ASME Section XI Year 1995/96 A	10/20/2000
B9.11	25-022	Tee to 4" Branch Connection Weld	62%	10/22/2000- Code ASME Section XI Year 1995/96 A	10/20/2000

**Limited B-J Examinations**

<u>Item No.</u>	<u>Comp. ID</u>	<u>Item Description</u>	<u>% Coverage</u>	<u>Date examined/Code Year</u>	<u>Surface Examination Dates</u>
B9.11	26-002	8" x 6" Reducing Safe-end to 6" Elbow Weld	50%	10/20/2000- Code ASME Section XI Year 1995/96 A	10/20/2000
B9.11	26-007	8" x 6" Reducing Safe-end to 6" Elbow Weld	52%	10/20/2000- Code ASME Section XI Year 1995/96 A	10/20/2000
B9.21	15-006	2" Drain Nozzle to Safe end Weld	85.5%	11/01/2000- Code ASME Section XI Year 1995/96 A	10/31/2000
B9.21	27-002	2" Pipe to Elbow Weld	75%	10/22/2000- Code ASME Section XI Year 1995/96 A	10/21/2000
B9.21	27-004	2" Pipe to Elbow Weld	75%	10/22/2000- Code ASME Section XI Year 1995/96 A	10/21/2000
B9.21	27-005	Elbow to 2" Pipe Weld	75%	10/22/2000- Code ASME Section XI Year 1995/96 A	10/21/2000
B9.21	27-006	2" Pipe to Elbow Weld	75%	10/22/2000- Code ASME Section XI Year 1995/96 A	10/21/2000
B9.21	27-007	Elbow to 2" Pipe Weld	75%	10/22/2000- Code ASME Section XI Year 1995/96 A	10/21/2000
B9.21	27-008	2" Pipe to Elbow Weld	75%	10/22/2000- Code ASME Section XI Year 1995/96 A	10/21/2000
B9.21	27-009	Elbow to 2" Pipe Weld	75%	10/22/2000- Code ASME Section XI Year 1995/96 A	10/21/2000
B9.21	27-010	2" Pipe to Elbow Weld	75%	10/26/2000- Code ASME Section XI Year 1995/96 A	10/26/2000
B9.21	27-011	Elbow to 2" Pipe Weld	75%	10/26/2000- Code ASME Section XI Year 1995/96 A	10/26/2000
B9.21	27-037	Tee to 2" Pipe Weld	62%	10/26/2000- Code ASME Section XI Year 1995/96 A	10/26/2000
B9.21	27-038	Elbow to 2" Pipe Weld	75%	10/26/2000- Code ASME Section XI Year 1995/96 A	10/26/2000
B9.21	27-054	2" Pipe to Elbow Weld	75%	10/28/2000- Code ASME Section XI Year 1995/96 A	10/27/2000
B9.21	27-055	Elbow to 2" Pipe Weld	75%	10/28/2000- Code ASME Section XI Year 1995/96 A	10/27/2000
B9.21	28-001	2" Pipe to Elbow Weld	75%	10/19/2000- Code ASME Section XI Year 1995/96 A	10/18/2000
B9.21	28-002	Elbow to 2" Pipe Weld	75%	10/19/2000- Code ASME Section XI Year 1995/96 A	10/18/2000
B9.21	28-008	2" Pipe to Elbow Weld	75%	10/19/2000- Code ASME Section XI Year 1995/96 A	10/18/2000
B9.21	28-009	Elbow to 2" Pipe Weld	75%	10/19/2000- Code ASME Section XI Year 1995/96 A	10/18/2000
B9.21	28-012	2" pipe to 2" x 2" x 2" Tee Weld	70%	10/20/2000- Code ASME Section XI Year 1995/96 A	10/18/2000
B9.21	28-013	2" x 2" x 2" Tee to 2" Pipe Weld	75%	10/19/2000- Code ASME Section XI Year 1995/96 A	10/18/2000
B9.21	28-016	2" x 2" x 2" Tee to 2" Branch Connection Weld	51%	10/20/2000- Code ASME Section XI Year 1995/96 A	10/18/2000
B9.21	28-074	2" pipe to 2" x 2" x 2" Tee Weld	75%	10/19/2000- Code ASME Section XI Year 1995/96 A	10/18/2000
B9.21	28-075	2" x 2" x 2" Tee to 2" Pipe Weld	75%	10/19/2000- Code ASME Section XI Year 1995/96 A	10/18/2000
B9.21	28-076	Tee to 2" Pipe Weld	62%	10/19/2000- Code ASME Section XI Year 1995/96 A	10/18/2000
B9.21	28-077	2" Pipe to Elbow Weld	75%	10/19/2000- Code ASME Section XI Year 1995/96 A	10/18/2000
B9.21	28-078	Elbow to 2" Pipe Weld	75%	10/19/2000- Code ASME Section XI Year 1995/96 A	10/18/2000
B9.31	08-008	12" Safety Injection Nozzle to 30" Pipe Weld	50%	4/02/2002- Code ASME Section XI Year 1995/96 A	04/02/2002

<b>Limited C-F-1 Examinations</b>					
<b><u>Item No.</u></b>	<b><u>Comp. ID</u></b>	<b><u>Item Description</u></b>	<b><u>% Coverage</u></b>	<b><u>Date examined/Code Year</u></b>	<b><u>Surface Examination Dates</u></b>
C5.11	55-051	8" Pipe to Valve Weld	45.5%	3/2/99- Code ASME Section XI Year 1980/W81A	03/02/1999
C5.11	64-001	Valve to 10" Pipe Weld	50%	7/12/00-Code ASME Section XI Year 1995/96A	07/12/2000
C5.11	56-001	LPSI Valve to 10" Pipe Weld	50%	1/28/03- Code ASME Section XI Year 1995/96A	01/28/2003
C5.11	56-002	LPSI 10" Pipe to Tee Weld	50%	1/28/03- Code ASME Section XI Year 1995/96A	01/28/2003
C5.11	56-003	LPSI Tee to 10" Pipe Weld	50%	1/28/03- Code ASME Section XI Year 1995/96A	01/28/2003
C5.11	61-071	14" x 8" Reducing Elbow to Flange Weld	50%	6/27/06- Code ASME Section XI Year 1995/96A	Surface Exam Not Required Code Case N-663
C5.11	55-001	10" valve to stainless pipe weld	50%	8/28/08- Code ASME Section XI Year 1995/96A	Surface Exam Not Required Code Case N-663
C5.11	56-005	Tee to 10" Pipe Weld	50%	1/28/03- Code ASME Section XI Year 1995/96A	01/28/2003
C5.11	56-043	10" Pipe to 10" x 6" Reducer Weld	50%	8/11/03- Code ASME Section XI Year 1995/96A	08/11/2003
C5.11	56-077	8" Pipe to Cont. Penetration Weld	50%	8/11/03- Code ASME Section XI Year 1995/96A	08/11/2003
C5.11	52-004	14" Elbow to Tee Weld	50%	5/4/05- Code ASME Section XI Year 1995/96A	Surface Exam Not Required Code Case N-663
C5.21	60-131	4" Pipe to Tee	79%	2/4/03- Code ASME Section XI Year 1995/96A	02/04/2003
C5.21	60-468	3" Elbow to Pipe Weld	50%	10/25/00- Code ASME Section XI Year 1995/96A	10/24/2000
C5.21	60-469	Pipe to Penetration Weld	50%	10/25/00- Code ASME Section XI Year 1995/96A	10/24/2000

**Note 1**

Code Case N-663 was approved for use at this time but the program owner elected to go ahead and perform the surface exam on these welds