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June 28, 2010

Mr. Timothy Lupold,
USNRC NRR Piping & NDE Branch Chief

During our recent meeting held in Charlotte on June 17 and 18 of 2010, Code Case N-526 was discussed. The NRC indicated that they would like to see the words qualified individual and ligament within the body of the previously NRC approved code case.

PDI took an action to discuss the Commission's request at our PDI meeting the following week (6/21/2010). At the PDI/NRC meeting I committed to respond in writing with the PDI Committee's decision.

PDI concluded that Code Case N-526 is acceptable as written and does not require further clarification. It is the opinion of PDI that the techniques that would be used to size indications found in vessels other than the reactor pressure vessel are already addressed in Appendix I, Supplement 12 paragraph b) which states *"For components to which Appendix VIII is not applicable, sizing techniques qualified in accordance with Appendix VIII may be applied, provided such components, materials, sizes, and shapes are within the scope of the qualified flaw sizing procedure."* Reactor vessels are covered by requirements of Appendix VIII, Supplements 4 and 6.

It was also the opinion of committee that adding the word ligament to the Code case would add no appreciable value. When performing sizing, the examiner performing the depth measurement is providing sufficient information to determine the actual ligament above and below the flaw. For example, if a mid wall flaw were depth sized the remaining ligament would be measured to the top and bottom of the flaw. These ligaments coupled with the component thickness will be used to determine if the flaw must be considered surface or subsurface.

Based on the above, PDI will not be taking any code action to revise Code Case N-526.

Sincerely,

Richard Fuller
PDI Chairman

CC:

Don Naujock, NRC
Mark Huting, IC Chairman
Carl Latiolais, PDA Program Manager