

PMSTPCOL PEmails

From: Tai, Tom
Sent: Wednesday, October 12, 2011 3:35 PM
To: Price, John E
Cc: STPCOL
Subject: Containment ISI Samples
Attachments: Bellefonte Ch 6.6.pdf

John,

Attached for your information is excerpt from Chapter 6.6 of Bellefonte. This is downloaded from the public webpage.

The major differences between this and STP's Ch 6.6 include the title (MC Components) and the description of issues such as accessibility and examination. Please share this with your staff for our Monday discussion of RAI 6042 issued under NRC Letter 385.

I'm checking the feasibility of releasing Chapter 6.6 of the AP1000 DCD. If this also public information, I have a copy that I can send later.

Regards

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Subject: Containment ISI Samples
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From: Tai, Tom

Created By: Tom.Tai@nrc.gov

Recipients:
"STPCOL" <STP.COL@nrc.gov>
Tracking Status: None
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6.6 INSERVICE INSPECTION OF CLASS 2, 3, AND MC COMPONENTS

This **section** of the referenced DCD is incorporated by reference with the following departures and/or supplements.

Add the following to DCD Section 6.6 ahead of Subsection 6.6.1 heading:

- STD COL 6.6-1 The initial inservice inspection program incorporates the latest edition and addenda of the ASME Boiler and Pressure Vessel Code approved in 10 CFR 50.55a(b) on the date 12 months before initial fuel load. Inservice examination of components and system pressure tests conducted during successive 120-month inspection intervals must comply with the requirements of the latest edition and addenda of the Code incorporated by reference in 10 CFR 50.55a(b) 12 months before the start of the 120-month inspection interval (or the optional ASME Code cases listed in Regulatory Guide 1.147, that are incorporated by reference in 10 CFR 50.55a(b), subject to the limitations and modifications listed in 10 CFR 50.55a(b)).

6.6.1 COMPONENTS SUBJECT TO EXAMINATION

Add the following to the end of DCD Subsection 6.6.1:

- STD COL 6.6-1 Class 2 and 3 components are included in the equipment designation list and the line designation list contained in the inservice inspection program.

6.6.2 ACCESSIBILITY

Revise the first and last sentences of the third paragraph in DCD Subsection 6.6.2 to add supplemental information as follows:

- STD SUP 6.6-1 Considerable experience has been drawn on in designing, locating, and supporting Quality Group B and C (ASME Class 2 and 3) and Class MC pressure-retaining components to permit pre-service and inservice inspection required by Section XI of the ASME Code. Factors such as examination requirements, examination techniques, accessibility, component geometry, and material selections are used in establishing the designs. The inspection design goals are to eliminate uninspectable components, reduce occupational radiation exposure, reduce inspection times, allow state-of-the-art inspection systems, and enhance

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detection and the reliability of flaw characterization. There are no Quality Group B and C components or Class MC components, which require inservice inspection during reactor operation.

Add the following to the end of DCD Subsection 6.6.2:

- STD COL 6.6-2 During the construction phase of the project, anomalies and construction issues are addressed using change control procedures. Modifications reviewed following design certification adhere to the same level of review as the certified design per 10 CFR Part 50, Appendix B as implemented by the Westinghouse Quality Management System (QMS). The QMS requires that changes to approved design documents, including field changes, are subject to the same review and approval process as the original design. This explicitly requires the field change process to follow the same level of review that was required during the design process. Accessibility and inspectability are key components of the design process.

Control of accessibility for inspectability and testing during post-design certification activities is provided via procedures for design control and plant modifications.

6.6.3 EXAMINATION TECHNIQUES AND PROCEDURES

Add the following Subsections 6.6.3.1, 6.6.3.2 and 6.6.3.3 to the end of DCD Subsection 6.6.3:

6.6.3.1 Examination Methods

Visual Examination

- STD COL 6.6-1 Visual examination methods VT-1, VT-2 and VT-3 are conducted in accordance with ASME Section XI, IWA-2210. In addition, VT-2 examinations meet the requirements of IWA-5240.

Where direct visual VT-1 examinations are conducted without the use of mirrors or with other viewing aids, clearance is provided in accordance with Table IWA-2210-1.

Surface Examination

Magnetic particle, liquid penetrant, and eddy current examination techniques are performed in accordance with ASME Section XI, IWA-2221, IWA-2222, and IWA-2223 respectively. Direct examination access for magnetic particle (MT) and

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liquid penetrant (PT) examination is the same as that required for direct visual (VT-1) examination (see Visual Examination), except that additional access is provided as necessary to enable physical contact with the item in order to perform the examination. Remote MT and PT generally are not appropriate as a standard examination process; however, boroscopes and mirrors can be used at close range to improve the angle of vision.

Ultrasonic Examination

Volumetric ultrasonic direct examination is performed in accordance with ASME Section XI, IWA-2232, which references mandatory Appendix I.

Alternative Examination Techniques

As provided by ASME Section XI, IWA-2240, alternative examination methods, a combination of methods, or newly developed techniques may be substituted for the methods specified for a given item in this section, provided that they are demonstrated to be equivalent or superior to the specified method. This provision allows for the use of newly developed examination methods, techniques, etc., which may result in improvements in examination reliability and reductions in personnel exposure. In accordance with 10 CFR 50.55a(b)(2)(xix), IWA-2240 as written in the 1997 Addenda of ASME Section XI must be used when applying these provisions.

6.6.3.2 Qualification of Personnel and Examination Systems for Ultrasonic Examination

Personnel performing examinations shall be qualified in accordance with ASME Section XI, Appendix VII. Ultrasonic examination systems shall be qualified in accordance with industry accepted programs for implementation of ASME Section XI, Appendix VIII.

6.6.3.3 Relief Requests

The specific areas where the applicable ASME Code requirements cannot be met are identified after the examinations are performed. Should relief requests be required, they will be developed through the regulatory process and submitted to the NRC for approval in accordance with 10 CFR 50.55a(a)(3) or 50.55a(g)(5). The relief requests include appropriate justifications and proposed alternative inspection methods.

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6.6.4 INSPECTION INTERVALS

Add the following to the end of DCD Subsection 6.6.4:

- STD COL 6.6-1 Because 10 CFR 50.55a(g)(4) requires 120-month inspection intervals, Inspection Program B of IWB-2400 must be chosen. The inspection interval is divided into three periods. Period one comprises the first three years of the interval, period two comprises the next four years of the interval, and period three comprises the remaining three years of the inspection interval. The periods within each inspection interval may be extended by as much as one year to permit inspections to be concurrent with plant outages. The adjustment of period end dates shall not alter the rules and requirements for scheduling inspection intervals. It is intended that inservice examinations be performed during normal plant outages, such as refueling shutdown or maintenance shutdowns occurring during the inspection interval.
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6.6.6 EVALUATION OF EXAMINATION RESULTS

Add the following new paragraph at the end of DCD Subsection 6.6.6:

- STD COL 6.6-1 Components containing flaws or relevant conditions and accepted for continued service in accordance with the requirements of IWC-3122.3 or IWC-3132.3 for Class 2 components, IWD-3000 for Class 3 components, IWE-3122.3 for Class MC components, or IWF-3112.2 or IWF-3122.2 for component supports, are subjected to successive period examinations in accordance with the requirements of IWC-2420, IWD-2420, IWE-2420, or IWF-2420, respectively. Examinations that reveal flaws or relevant conditions exceeding Table IWC-3410-1, IWD-3000, IWE-3000, or IWF-3400 acceptance standards are extended to include additional examinations in accordance with the requirements of IWC-2430, IWD-2430, or IWF-2430, respectively.
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6.6.9 COMBINED LICENSE INFORMATION ITEMS

6.6.9.1 Inspection Programs

STD COL 6.6-1 This COL Item is addressed in Section 6.6 introduction, and in Subsections 6.6.1, 6.6.3.1, 6.6.3.2, 6.6.3.3, 6.6.4, and 6.6.6.

6.6.9.2 Construction Activities

STD COL 6.6-2 This COL Item is addressed in Subsection 6.6.2.

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APPENDIX 6A
FISSION PRODUCT DISTRIBUTION IN THE AP1000 POST-DESIGN BASIS
ACCIDENT CONTAINMENT ATMOSPHERE

This **section** of the referenced DCD is incorporated by reference with no departures or supplements.