

## NRR-PMDAPEm Resource

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**From:** Feintuch, Karl  
**Sent:** Monday, June 04, 2012 6:36 PM  
**To:** Jack Gadzala  
**Cc:** Rezai, Ali; Moran, Traci L; Feintuch, Karl; Anderson, Michael T; McLellan, Thomas  
**Subject:** RE: ME7378 - RE: Kewanee Questions

The NRC requests a clarification of information contained in DEK's response (ADAMS Accession No. ML12136A461) date 5/9/2012 (DEK Letter 12-247)

Specifically, we would like to discuss the following points at a conference call on Friday, June 8, 2012, at 1100 ET (1000 CT; 0800 PT).

- Kewaunee Power Station does employ a risk-informed ISI program under the EPRI TR-112657 and Code Case N-578. However, the licensee chose not to assign specific risk-informed program category numbers for the Class 1 and Class 2 piping welds. ASME categories were used to identify the Class 1 and Class 2 welds and a note was added to each individual weld to identify them as risk-informed welds. By invoking the Code Case N-578, the licensee should be classifying the welds in the appropriate Category R-A Item numbers and not be using the original Categories B-F, B-J, C-F-1, and C-F-2.
  - Two of the major reasons for this is the inspection volumes are different and the original categories require a surface examination in addition to the volumetric examination.
- We did not ask the following in the original RAI because of the assumption, they would change to the R-A Category invoked in Code Case N-578. According to licensee's submittal for Examination Category C-F-1, two of the ASME Item numbers are listed as C5.13 and C5.14. According to ASME Code Section XI, Table IWC-2500-1, these Item numbers do not exist in the 1998 Edition through the 2000 Addenda.
- There were two Category B-J, Item 9.31 (Pipe Branch connection welds) that were re-examined in the 3rd period of the outage according to App. VIII, Supplement 2 and provided a note that RC-W3BC and RC-W34BC (Substitute for RC-W22BC in original submittal) - 50% Limitation Relief Request is expected to be submitted at the end of the 3rd Period examinations. These welds need to be officially withdrawn as they did for the feed water welds in their cover letter.

Please confirm Kewaunee participation.

Karl Feintuch  
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