

## **PMVogtleCOLPEm Resource**

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**From:** Joshi, Ravindra  
**Sent:** Monday, August 20, 2012 9:03 AM  
**To:** PMVogtleCOLPEm Resource  
**Subject:** RE: Telecon Summary--Public Conference call with Vogtle--August 15, 2012--  
**Attachments:** Position on Reactor Vessel Flow Skirt ITAAC.docx

Telecon Summary--Public Conference call with Vogtle--August 15, 2012—Docket Numbers 052-025 and 26

On August 15, 2012, the NRC staff (See list below) participated in a telephone conference call with Vogtle representatives (list is provided below) to discuss resolution of issues to support the safety review of SNC's licensing actions for Vogtle Units 3 and 4. Specifically, the following item was discussed with SNC :

- Alternative for the reactor vessel flow skirt weld and its relationship with ITAAC ( SNC letter dated June 29, 2012)

### **Participants:**

#### **NRC Participants:**

R. Joshi  
A. Masters  
D. Terao  
M. Jardaneh  
C. Welch

SNC  
Amy Aughtman  
Dave Midlik  
Rick Graham  
Clint Medlock (ITAAC)

WEC  
Chip Suggs  
Chuck Brokhoff  
Augi Cardillo  
Bill Carnes

DCWG members  
Joe Gillespie  
Steve Franzone

#### **Public:**

Bill Jacobs, Steve Roetger, Sara Barczak

#### **Discussion:**

- Alternative for the reactor vessel flow skirt weld and its relationship with ITAAC ( SNC letter dated June 29, 2012)

SNC discussed its position (using the attached document) that the reactor vessel flow skirt is not part of ITAAC . The NRC stated that it agrees with the conclusion that the subject alternative has no impact on the ITAAC (but no endorsement on the details presented in the attachment).

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**Hearing Identifier:** Vogtle\_COL\_Public  
**Email Number:** 569

**Mail Envelope Properties** (BBC4D3C29CD0E64E9FD6CE1AF26D84D5C62DFD71A0)

**Subject:** RE: Telecon Summary--Public Conference call with Vogtle--August 15, 2012--  
**Sent Date:** 8/20/2012 9:03:08 AM  
**Received Date:** 8/20/2012 9:03:09 AM  
**From:** Joshi, Ravindra

**Created By:** Ravindra.Joshi@nrc.gov

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Tracking Status: None

**Post Office:** HQCLSTR01.nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	1567	8/20/2012 9:03:09 AM
Position on Reactor Vessel Flow Skirt ITAAC.docx		21094

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

## **Position on VEGP 3&4 Reactor Vessel Flow Skirt ITAAC**

### **Purpose:**

The purpose of this document is to provide the considerations used in establishing the position that VEGP 3&4 ITAAC are unaffected by changes to the ASME jurisdictional boundary between the Reactor Vessel (RV) and the Reactor Vessel Flow Skirt (RVFS).

### **Background Information:**

The RVFS is categorized as a non-ASME Section III component. This categorization is not affected by the possible change in jurisdictional boundary of the weld between the RV and the RVFS.

The RVFS has clearly been established as being welded to support pads within the RV – this concept is not being changed by the consideration of change in weld jurisdictional boundary.

The RV is an integral part of the Reactor Coolant System (RCS) pressure boundary. However because of the complexity of the RV and the components associated with it, it has been made a separate system, the Reactor System (RXS), in tier1 with its own ITAAC. The ASME Code, however, is oriented towards the entire RCS pressure boundary approach. Thus the ASME code considers the RV as a component within the RCS, while the RV is part of the RXS in regards to ITAAC.

One part of the issue at hand deals with whether the weld between the RV and RVFS should be in the RCS system or in the RXS system. The second part of the issue deals with how the weld between the RVFS and the RV is programmatically addressed and documentation provided to assure the requirements on this weld are complied with.

### **RV-to-RVFS weld: in RCS or in RXS?**

The RCS (section 2.1.2 of tier 1) identifies neither the RVFS nor the RV in table 2.1.2-1. However, for point of comparison, table 2.1.2-2 does identify the hot and cold leg piping. ITAAC 2.1.02.03b (“A report exists and concludes that the ASME Code Section III requirements are met for non-destructive examination of pressure boundary welds” [for piping]) does not indicate which welds are included – specifically the item of note is the weld between the loop piping and the Reactor Vessel. Since the RV is not listed in table 2.1.2-1, this weld could be considered to be part of the RCS ITAAC as part of the piping.

The RXS (section 2.1.3 of tier 1) has ITAAC 2.1.03.04 (“A report exists and concludes that the ASME Code Section III requirements are met for non-destructive examination of pressure boundary welds.” [for components]). Since the RV is part of the RXS pressure boundary, the welds between the loop piping and the RV could be considered part of the RXS system.

The above two paragraphs demonstrate that the ITAAC do not definitively identify which individual weld is in which ITAAC, but depend upon the ASME Code to provide which pressure boundary definition a weld falls into.

These ITAAC requirements are that ‘A report exists that concludes that the ASME Code Section III requirements are met ...’. It is a strong expectation that this report be the ASME N-5 data report, which is the assimilation of the information needed to conclude that a system has been designed, constructed and inspected in accordance with the ASME Code requirements.

The ASME approach will bound the pressure boundaries of the RXS system within the RCS system N-5 data report. Therefore, whether the weld between the loop piping and the RV (and similarly the weld between the RVFS and the RV) is considered part of the RXS or part of the RCS ITAAC, the ITAAC will be satisfied by the same ASME N-5 data report. Therefore, no change is expected to the ITAAC.

#### Where is the RVFS-RV weld addressed programmatically?

The Vogtle 3&4 USFAR recognized that the RVFS was welded to the RV. Under the ASME Code, the RV is part of the RCS system pressure boundary. Therefore from a programmatic perspective, this weld needs to be addressed within the requirements of the ASME Code associated with the RCS. Whether the weld is included or excluded in the ASME jurisdictional boundary, the ASME code provisions and the treatment of this weld will be addressed within the RCS N-5 data report.

Since the ITAAC do not specify each individual weld, but rely upon the ASME pressure boundary approach, and since the ASME pressure boundary approach considers the RXS as part of the RCS, no ITAAC is impacted by the consideration of a change in the RVFS-to-RV weld jurisdictional boundary.