

Relief Requests on Limited Exams

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NRC/ASME Semi-Annual
Management Meeting

Relief Requests on Limited Exams

- Limited Examinations
 - There are certain existing configurations that do not provide access for code required volumes to be examined
 - Some Nozzle-to-Vessel or Shell welds
 - Head to Flange Welds
 - Steam Generator Steam Outlet Nozzles with the bored flow restrictor holes
 - One sided UT of SS welds not ground flush
 - Pipe to fittings such as nozzles, elbows, tees, valves
 - 4 inch Pipe to elbows

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- Limited Examinations (cont.)
 - Code Case N-711 has been published to provide a method to determine if examination coverage is acceptable
 - This Code Case is included in RG 1.193 “ASME Code Cases Not Approved for Use”
 - The reason for the disapproval follows:

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N-711 Alternative Examination Coverage Requirements for Examination Category

B-F, B-J, C-F-1, C-F-2, and R-A Piping Welds, Section XI, Division 1

1/05/06

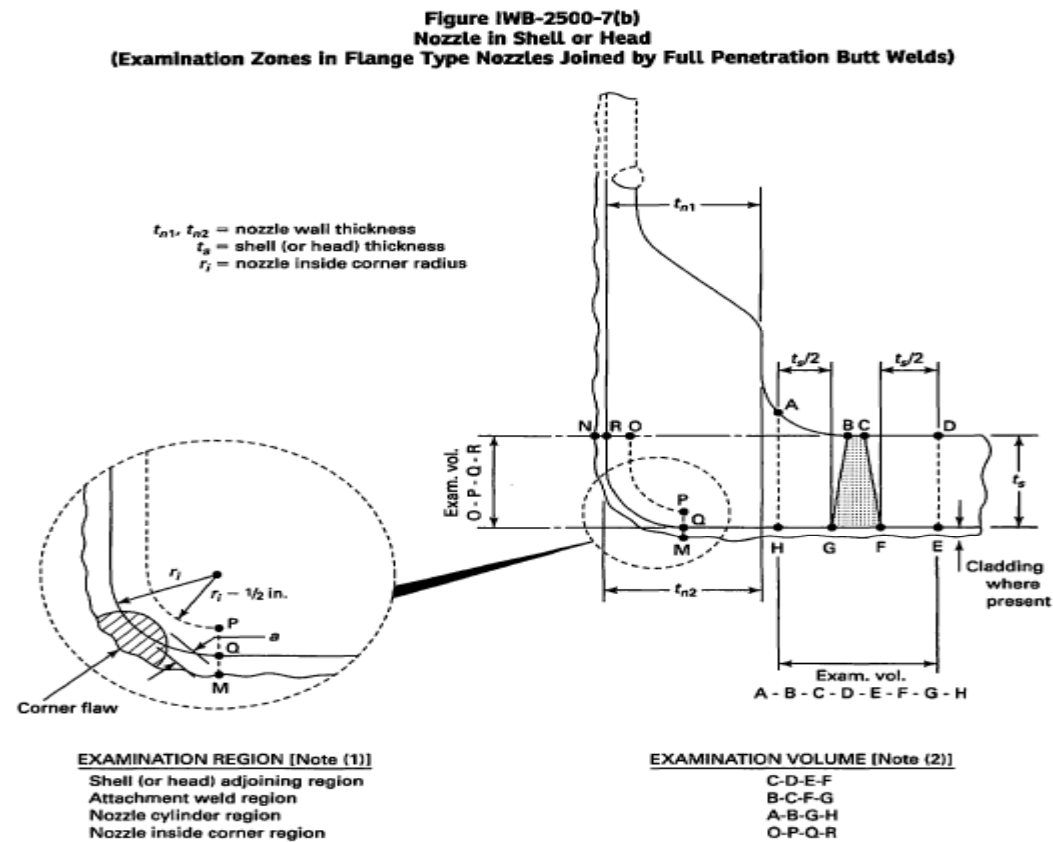
The Code Case would permit each licensee to independently determine when achievement of a coverage requirement is impractical, and when Code required coverage is satisfied. As a result, application of the Code Case for similar configurations at different plants could result in potentially significant quantitative variations. Furthermore, application of the Code Case is inconsistent with NRC's responsibility for determining whether examinations are impractical, and eliminates the NRC's ability to take exception to a licensee's proposed action and impose additional measures where warranted in accordance with 10 CFR 50.55a(g)(6)(i).

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- Limited Examinations (cont.)
 - There should be some type of compromise that can be developed to limit the number of relief request being submitted
 - Reduce the number of personnel hours from both the utility and NRC
 - Reduce the cost associated with these relief request as they are submitted every interval
 - Put the requirements in the code as to what needs to be considered prior to acceptance of limited examinations

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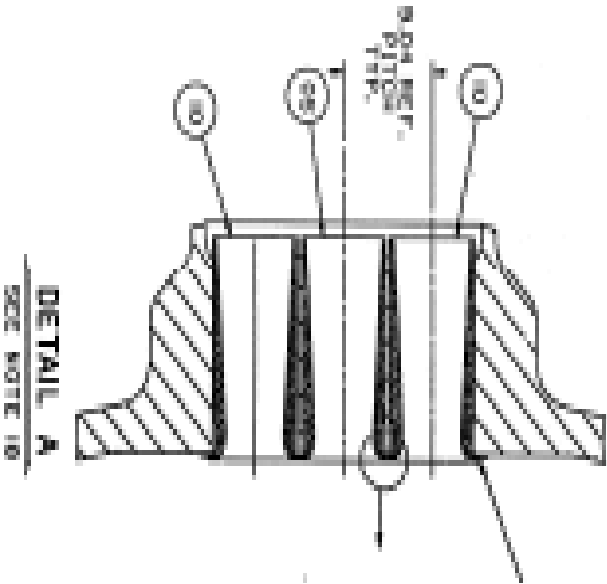
Some Configurations



NOTES:

- (1) Examination regions are identified for the purpose of differentiating the acceptance standards in IWB-3512.
- (2) Examination volumes may be determined either by direct measurements on the component or by measurements based on design drawings.

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QUESTIONS