

Failla, David

From: Davis, Robert
Sent: Thursday, August 16, 2012 9:42 AM
To: Poole, Justin
Cc: Nazario, Tomy; Failla, David
Subject: RE: RPV Stud Holes and ASME Code Questions (LARGE FILE)

I took a quick look at the documents and at this point, I would agree with the license. I will look at it closer next week and let you know my final position. Dave, please call me when you get a chance.

Bob.

From: Poole, Justin
Sent: Thursday, August 16, 2012 9:23 AM
To: Davis, Robert
Subject: FW: RPV Stud Holes and ASME Code Questions (LARGE FILE)

The first attachment has a lot of the background. Thanks.

Justin C. Poole
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U.S. Nuclear Regulatory Commission
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email: Justin.Poole@nrc.gov

From: Nazario, Tomy
Sent: Friday, August 10, 2012 3:58 PM
To: Poole, Justin
Cc: Even, Christopher; Baptist, James; Failla, David; Haag, Robert
Subject: RPV Stud Holes and ASME Code Questions (LARGE FILE)

Justin,

As previously discussed and noted below, TVA sleeved three reactor pressure vessel (RPV) stud holes (picture attached as "Document.pdf") during which no NDE was performed. We believe that based on a TIA for Davis Besse issued on October 2011 (Memo 92611 Davis Besse Head Exam-attached) and our initial read of the ASME Code (1971 EDITION-attached) that that NDE should have been performed for the accessible portions of the RPV stud hole.

TVA and Westinghouse have since responded to our concern and have indicated that prior to the work commencing this was evaluated and Westinghouse believed the NDE to not be applicable. They have initiated a problem evaluation report (PER 572414-attached) and included Westinghouse's position (WB2 studholes timeline-attached) which states that "there is no requirement to perform surface examination of the bored holes."

Since there was a previous TIA issued on this subject, NRR Office Instruction COM-106 states that we can discuss this issue via telecom with the appropriate staff and therefore a new TIA may not be necessary. We'd like to engage the staff and get the Code experts and the originator of the TIA to help us better understand whether a violation of NRC and ASME Code requirements exist.

Our questions are as follows:

C/54

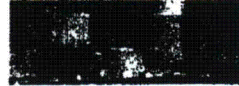
- 1) Is NB 2500 applicable for the work performed (machining of the RPV stud holes), and if so, should NDE of the accessible portions of the RPV stud holes (similar to NRC staff's position as noted in the TIA) have been performed in accordance with the Code?
- 2) Given that the sleeves have been installed and no NDE was performed, in the staff's opinion, what would be an acceptable means (e.g. engineering evaluation, re-sleeving, etc.) for satisfying these requirements that may not have been met ?

We appreciate any support you could provide. Please note that based on the staff's final position, for this issue, we would consider whether a violation of 50.55a, Codes and Standards exists. Dave Failla has been closely following this issue and is out next week but will be back in the office the week of 8/20. Therefore, we can setup a telecon anytime after 8/20. Thank you.

Tomy

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From: Failla, David
Sent: Friday, August 10, 2012 3:03 PM
To: Nazario, Tomy
Subject: RPV Stud Holes

Tomy,

Attached are the documents related to the RPV stud hole surface exams. Our position is Westinghouse/PCI should have performed a surface exam on the stud holes after machining the holes for the threaded inserts. Westinghouse's position is that the code does not require them to do a surface exam. This issue is similar to that discussed in TIA 2011-015 (attached).

David Failla
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