

## Regulatory Guide Periodic Review

**Regulatory Guide Number:** 1.71, Revision 1

**Title:** Welder Qualification for Areas of Limited Accessibility

**Office/division/branch:** RES/DE/CMB

**Technical Lead:** Darrell Dunn

**Staff Action Decided:** Reviewed with issues identified for future consideration

**1. What are the known technical or regulatory issues with the current version of the Regulatory Guide (RG)?**

RG 1.71 may need some minor changes that include deleting Regulatory Position C.(3), adding a reference to EPRI 1008245 Welding Best Practices Manual for High-Risk/High Value Repairs, (2004), and adding guidance on general practice in nuclear shipbuilding and petrochemical process piping fabrication to include requirements for welder positioning, accessibility, and visibility to production welds. While this statement is not supported by a reference, it is accurate. EPRI-1008245 specifically addresses the benefits of using mockups for the preparation and demonstration of repairs including the use of realistic access limitations

**2. What is the impact on internal and external stakeholders of not updating the RG for the known issues, in terms of anticipated numbers of licensing and inspection activities over the next several years?**

There are no known impacts because the issues raised are already included in the ASME Code. In addition, 10 CFR 50 Appendix B Section IX, "Control of Special Processes," requires control of welding and use of qualified personnel. There are no identified impacts on internal or external stakeholders for not updating the RG.

**3. What is an estimate of the level of effort needed to address identified issues in terms of full-time equivalent (FTE) and contractor resources?**

Not applicable.

**4. Based on the answers to the questions above, what is the staff action for this guide (Reviewed with no issues identified, Reviewed with issues identified for future consideration, Revise, or Withdraw)?**

Reviewed with issues identified.

**5. Provide a conceptual plan and timeframe to address the issues identified during the review.**

Not applicable.

**NOTE:** This review was conducted in March 2013 and reflects the staff's plans as of that date. These plans are tentative and are subject to change.