

## Lamb, John

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**From:** Lamb, John  
**Sent:** Tuesday, April 11, 2017 10:43 AM  
**To:** 'mary.lampert@comcast.net'  
**Cc:** Dean, Bill; Evans, Michele; Dorman, Dan; Ross-Lee, MaryJane; Benner, Eric; Brock, Kathryn; Broaddus, Doug; Brown, Eva; Lubinski, John; Coyne, Kevin; Alley, David; Cumblidge, Stephen; Burritt, Arthur; Cline, Leonard; Carfang, Erin; Vazquez, Justin; Pinson, Brandon; Lew, David; Wall, Scott; Scott, Michael; Screnci, Diane; Sheehan, Neil; Tiff, Doug; Weil, Jenny; Dacus, Eugene; Burkhardt, Janet; Jackson, Donald; Watson, Bruce; Parrott, Jack; Carter, Ted; Kulp, Jeffrey  
**Subject:** NRC Response to Pilgrim Watch's Email Dated April 5, 2017, Regarding Pilgrim Relief Request Nos. PNPS-ISI-004 and PNPS-ISI-005

Dear Ms. Lampert:

I am responding to your e-mail dated April 5, 2017 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML17101A282), to the U.S. Nuclear Regulatory Commission (NRC), regarding the Pilgrim Nuclear Power Station (Pilgrim). Specifically, your e-mail communicated questions regarding Pilgrim's Relief Request Nos. PNPS-ISI-004 and PNPS-ISI-005 for relief from the American Society of Mechanical Engineers (ASME) Code, Section XI, volumetric inspections (ADAMS Accession No. ML17081A563). Your email had the following questions:

- (1) Were the welds tested in the past?
- (2) When in the past?
- (3) How were they tested?
- (4) If they have been tested in the past, what has changed to make testing difficult?

### BACKGROUND

In the document cited, Entergy requested relief from the "essentially 100 percent" volumetric coverage requirements for certain welds on the basis that the Code requirement is impractical due to the geometric configuration of the components.

The NRC regulations require that inservice examination of components and system pressure tests conducted during the first 10-year interval and subsequent intervals comply with the requirements in the latest edition and addenda of Section XI of the ASME Code, which was incorporated by reference in Title 10 of the *Code of Federal Regulations*, Part 50, Section 55a(b), 12 months prior to the start of the 10-year interval, subject to the limitations and modifications listed therein.

### RESPONSES TO PILGRIM WATCH QUESTIONS

#### Question 1

Were the welds tested in the past?

#### Response 1

Yes, the welds have been previously tested.

#### Question 2

When in the past?

#### Response 2

These welds are inspected once during each 10-year inservice inspection interval, i.e., between 1975-1985; 1985-1995; 1995-2005; and 2005-2015. Specifically, during the most recent interval, the inspections were conducted during May 2009, and April 2011.

Question 3

How were they tested?

Response 3

These welds were examined using ultrasonic testing (UT).

Question 4

If they have been tested in the past, what has changed to make testing difficult?

Response 4

Nothing has physically changed to make the test (inspection) more difficult. What has changed is that the last exams were conducted (qualified) in accordance with a more rigorous process that is now required by the ASME Code. The current ASME Code requires higher quality data than that previously required. Given the new data requirements, some portions of welds that previously could be considered inspected now must be classified as missed coverage. However, Entergy performed additional "best effort" inspection, which brought the volumetric coverage of the welds to close to 100-percent. Although the additional "best effort" inspections did not meet current qualification requirements, they were performed in a manner consistent with the ASME qualification process for the first three examinations. Therefore, the relief request which is the basis for your question is not the result of a decrease in the inspection of these welds, but rather an increase in the data quality acceptance criterion associated with the inspection.

As always, the health and safety of the public is of paramount importance to the NRC, and we appreciate your interest in our mission.

Sincerely,

John G. Lamb, Senior Project Manager  
Special Projects and Process Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation