

CATEGORY 1

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SUBJECT: Forwards request for relief from specified Section XI ISI & sys pressure testing requirements of 1986 edition of ASME B&PV code.

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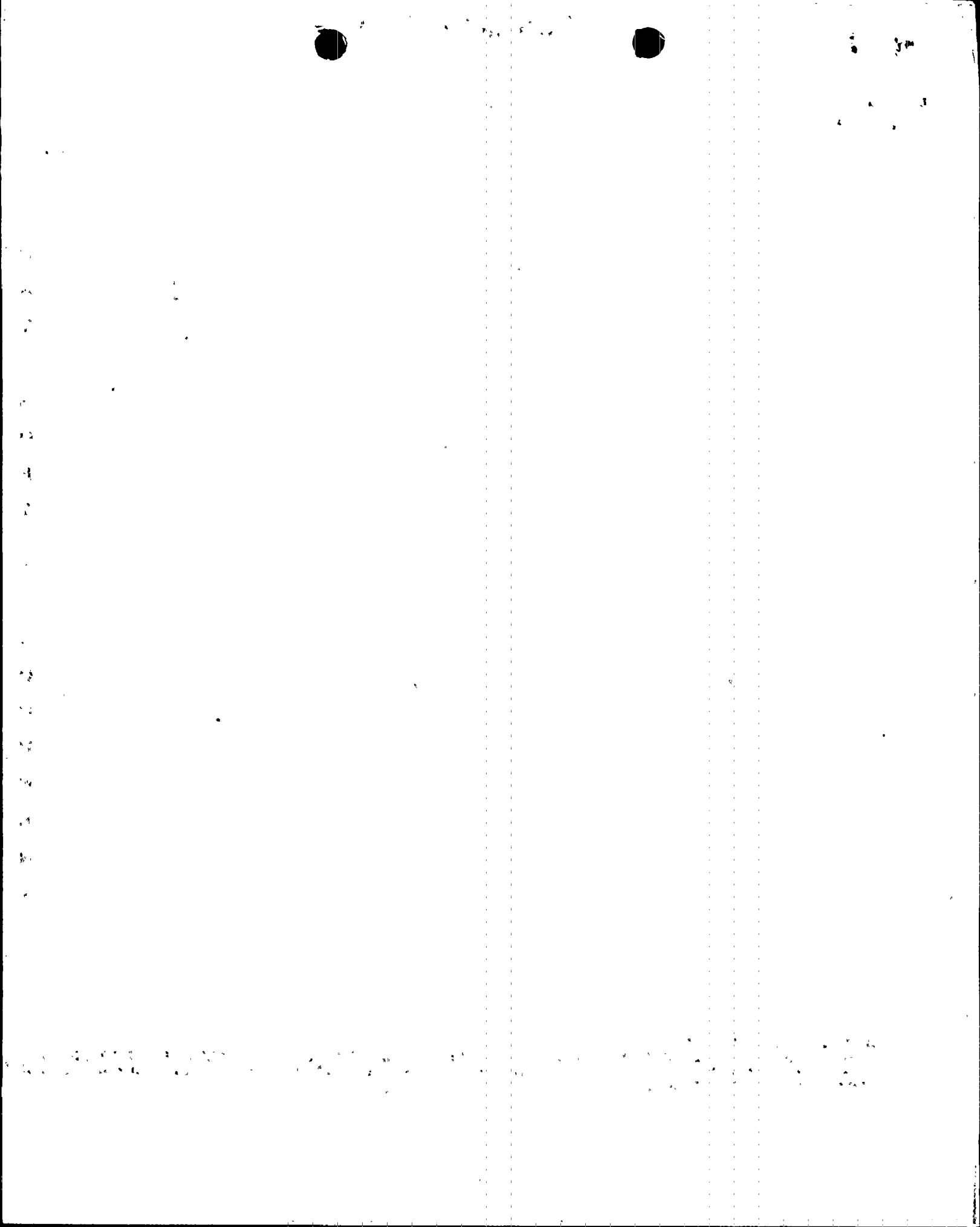
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Tennessee Valley Authority, Post Office Box 2000, Decatur, Alabama 35609-2000

June 4, 1997

10 CFR 50.55a(a)(3)(i and ii)

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

In the Matter of)
Tennessee Valley Authority)

Docket No. 50-260

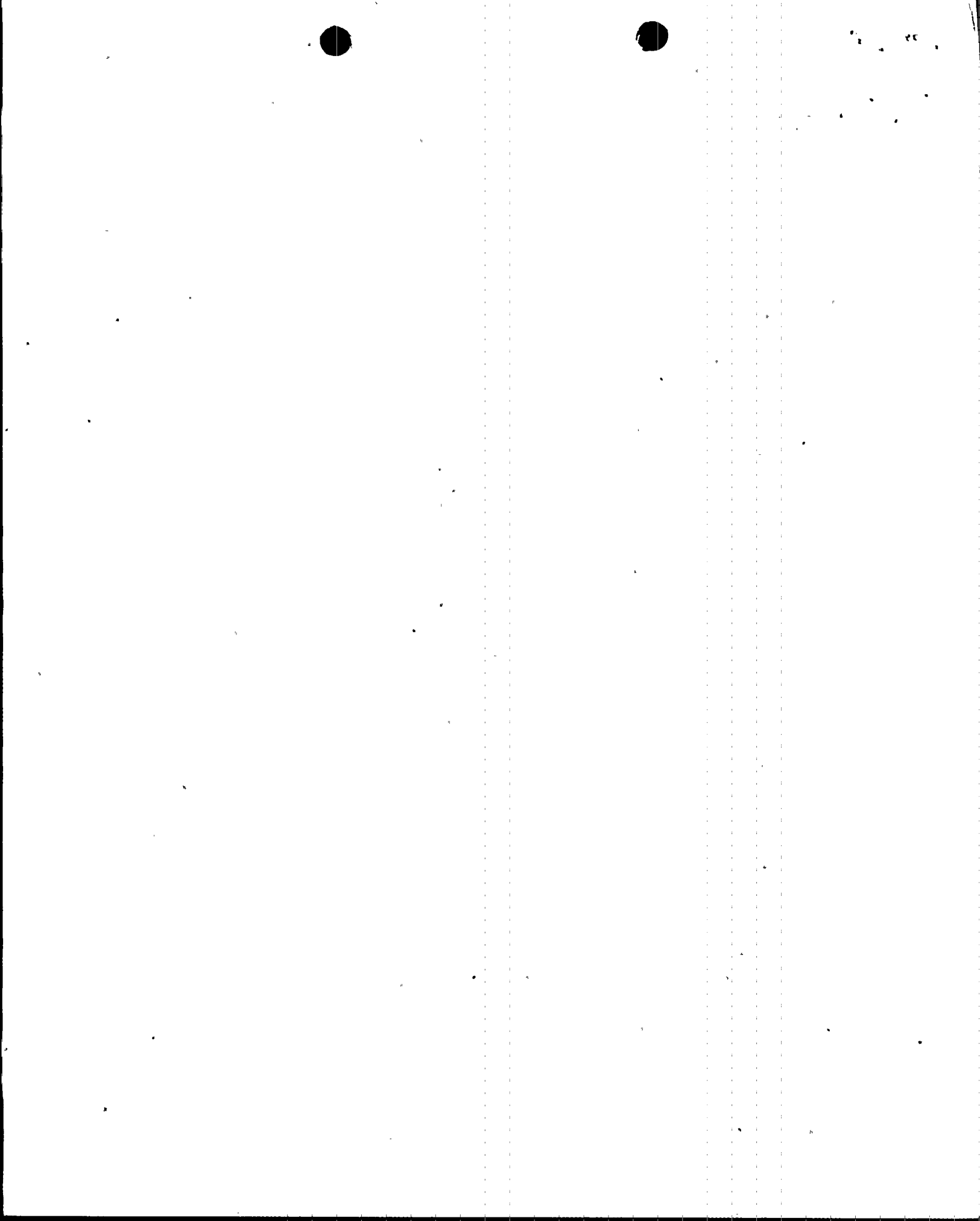
BROWNS FERRY NUCLEAR PLANT (BFN) - UNIT 2 - AMERICAN SOCIETY
OF MECHANICAL ENGINEERS (ASME) SECTION XI, INSERVICE
INSPECTION AND SYSTEM PRESSURE TEST PROGRAMS - RELIEF
REQUESTS TO SUPPORT THE CYCLE 9 REFUELING OUTAGE

In accordance with 10 CFR 50.55a(a)(3)(i and ii), the
enclosures to this letter contain requests for relief from
specified Section XI inservice inspection and system pressure
testing requirements of the 1986 Edition (no addenda) of the
ASME Boiler and Pressure Vessel Code.

In Enclosure 1, TVA is submitting four permanent relief
requests to the Unit 2 ASME Section XI system pressure test
requirements. Each of these relief requests seeks to invoke
an ASME Code Case as an alternative to the existing Code
requirement(s). The ASME Code Committee has approved each of
the proposed Code Cases, however, NRC has not accepted the
Code Cases for use in Regulatory Guide 1.147, Revision 11,
"Inservice Inspection Code Case Acceptability ASME Section
XI, Division 1," dated October 1, 1994. However, provisions
stated in footnote six to 10 CFR 50.55a provide for use of
other Code Cases upon request, if approved by the Director of
the Office of Nuclear Reactor Regulation pursuant to 10 CFR
50.55a(a)(3). TVA considers that each of the Code Cases,

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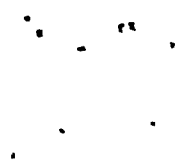
June 4, 1997

submitted as proposed ASME Code alternatives, in the relief requests provide an acceptable level of quality and safety. Further, compliance with the specified Code requirements would result in a hardship or unusual difficulty without a compensating increase in the level of quality or safety. The requests for relief are listed and briefly described below:

- 2-SPT-9 - Requests relief from the 10-year system hydrostatic testing for Class 1, 2, and 3 systems. TVA will instead utilize the requirements of ASME Code Case N-498-2, "Alternative Requirements for 10-Year System Hydrostatic Testing for Class 1, 2, and 3 Systems, Section XI, Division 1," which allows the use of an inservice leakage test in lieu of a hydrostatic pressure test. This relief request is a revision to one previously submitted for Unit 2 by TVA, invoking Code Case N-498-1, by letter dated March 9, 1995, and accepted by NRC letter dated August 18, 1995. Code Case N-498-2 removes the holding time (a minimum of four hours for insulated systems and ten minutes for noninsulated systems) at nominal operating pressure before performing the VT-2 visual examination.

Relief request 2-SPT-9 (revised) is similar to one submitted for BFN Unit 3 (3-SPT-2) by letter dated January 22, 1997, as part of the ASME Section XI, second inspection interval, program. Notwithstanding the different ASME Section XI Codes of record (1986 Edition for Unit 2 and 1989 for Unit 3) staff review of the two relief requests could be performed concurrently.

- 2-SPT-10 - Requests relief from ASME Section XI, Subsection IWA-2300, which requires that personnel performing VT-2 visual examinations be qualified and certified using a written approved procedure prepared in accordance with SNT-TC-1A and the additional requirements of Division 1 of ASME Section XI. TVA will instead utilize the requirements of ASME Code Case N-546, "Alternative Requirements for Qualification of VT-2 Examination Personnel," which permits experienced plant personnel to perform VT-2 examinations during the performance of system pressure tests.



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TVA submitted a similar relief request (3-SPT-3) for BFN Unit 3 by letter dated January 22, 1997. Staff review of the two relief requests could be performed concurrently.

- 2-SPT-11 - Requests relief from ASME Section XI, Subsection IWA-5250 (a)(2) that states if leakage occurs at a bolted connection, the bolting shall be removed, VT-3 visually examined for corrosion, and evaluated in accordance with Subsection IWA-3100. As an alternative, TVA will use the provisions of ASME Code Case N-566 which states: 1) the leakage shall be stopped and the bolting and component material shall be reviewed for joint integrity, 2) if the leakage is not stopped, the joint shall be evaluated in accordance with IWB-3142.4 for joint integrity.

TVA submitted a similar relief request for BFN Unit 3 (3-SPT-4) by letter dated January 22, 1997. Staff review of the two relief requests could be performed concurrently.

- 2-SPT-12 - Requests relief from ASME Section XI, Table IWC-2500-1, Category C-H (all pressure retaining components) that requires VT-2 visual examinations during, 1) IWC-5221, System Pressure Test During System Functional and System Inservice Tests, and 2) IWC-5222, System Hydrostatic Tests. TVA will instead use ASME Code Case N-522 which states the results of the containment testing program as required by 10 CFR 50 Appendix J may be used for Class 2 piping and isolation valves penetrating primary containment for systems outside the scope of ASME Section XI.

TVA submitted a similar relief request for BFN Unit 3 (3-SPT-5) by letter dated January 22, 1997. Staff review of the two relief requests could be performed concurrently.

In Enclosure 2, TVA is submitting one permanent request for relief (2-ISI-7 revised) to the BFN Unit 2 ASME Section XI inservice inspection program. TVA is requesting relief from ASME Section XI, Table IWB-2500-1, Examination Category



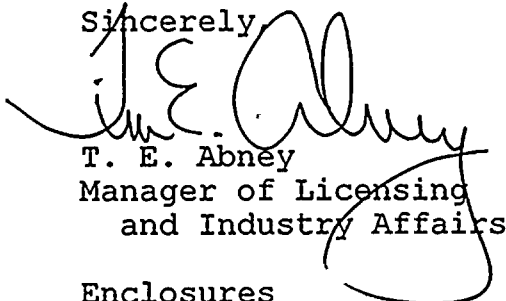
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B-K-1, integrally welded attachments for Class 1 components (Figure IWB-2500-15) and Table IWC-2500-1, Examination Category C-C, integrally welded attachments for Class 2 components (Figure IWC-2500-5). As an alternative, TVA proposes to perform the required examination on the accessible volume/area of the support integral attachment without removal of the support. TVA considers that the proposed alternative provides an acceptable level of quality and safety. Further, compliance with the specified Code requirement would result in a hardship or unusual difficulty without a compensating increase in the level of quality or safety. In addition, the ASME Section XI, 1995 Addenda provides for examination of the accessible areas of integral attachments without removal of support members. This relief request was originally submitted for Unit 2 by TVA letter dated November 12, 1996, and is being revised to include Class 2 components. A similar relief request for Unit 3 (3-ISI-4) was submitted by TVA letter dated January 22, 1997. Staff review of the two relief requests could be performed concurrently.

Review of this submittal is requested prior to the Unit 2 Cycle 9 refueling outage (except 2-SPT-9) to support scheduled ASME Section XI outage activities. The outage is currently scheduled to begin September 26, 1997. TVA will inform the NRC Project Manager of any changes to the outage schedule. For 2-SPT-9, TVA is requesting review prior to the Unit 2 Cycle 10 refueling outage scheduled to begin in March 1999.

There are no commitments contained in this letter. If you have any questions, please telephone me at (205) 729-2636.

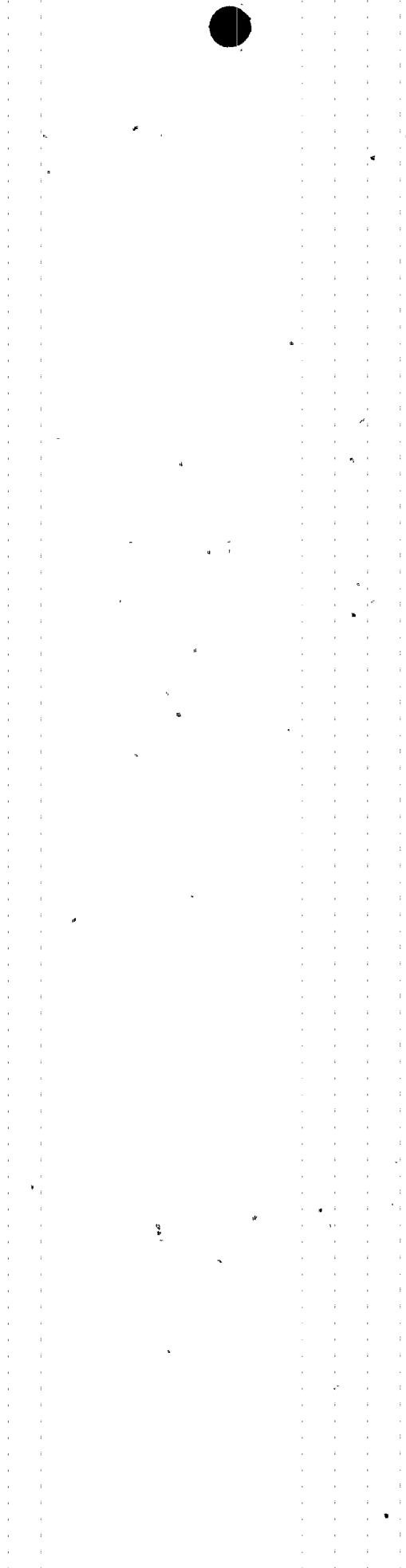
Sincerely,



T. E. Abney
Manager of Licensing
and Industry Affairs

Enclosures

cc: See page 5



U.S. Nuclear Regulatory Commission
Page 5
June 4, 1997

Enclosures

cc: (Enclosures):

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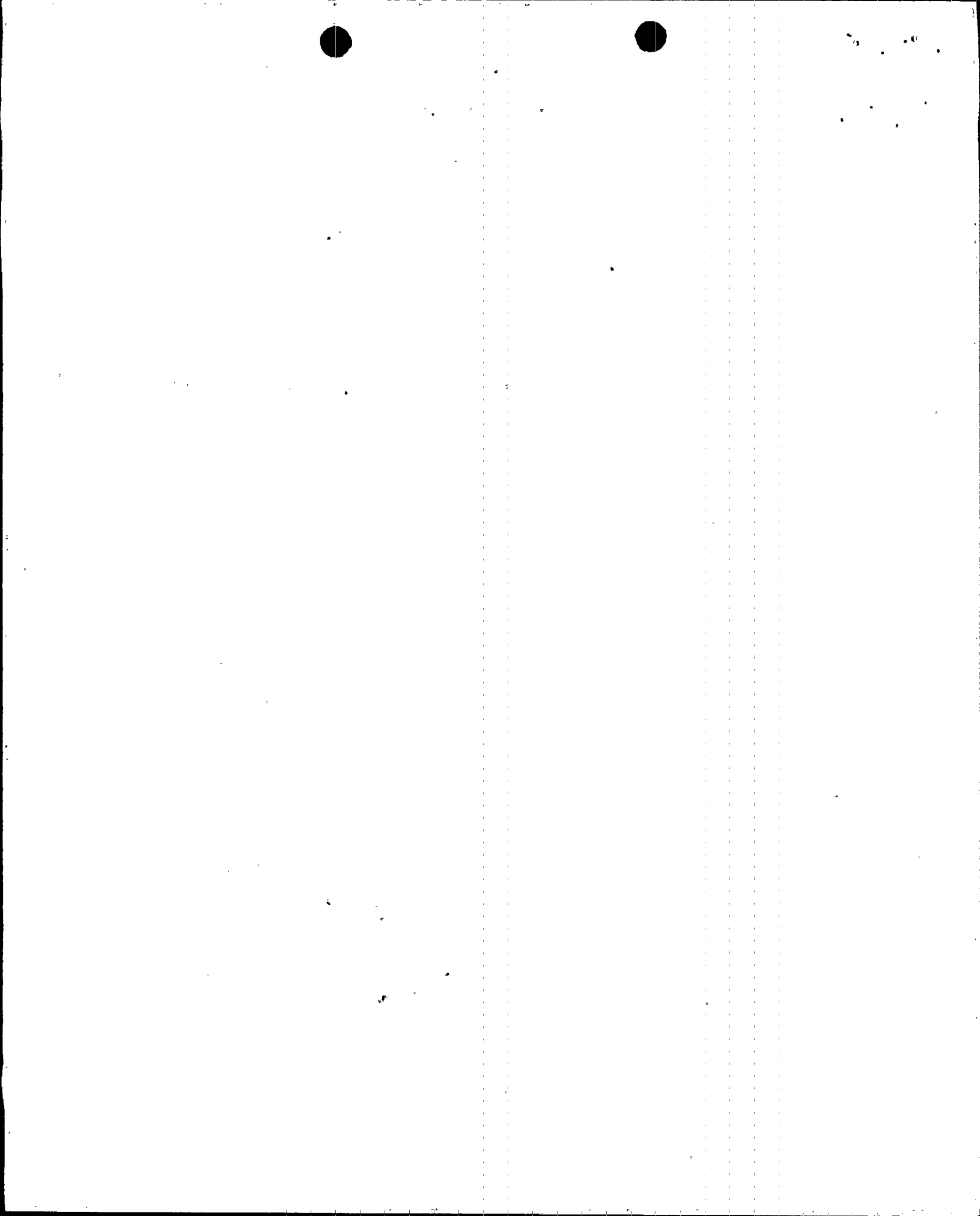


ENCLOSURE 1

TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNIT 2
AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) SECTION XI
SYSTEM PRESSURE TEST (SPT) PROGRAM
(SECOND INSPECTION INTERVAL)

REQUESTS FOR RELIEF TO SUPPORT THE CYCLE 9 REFUELING OUTAGE

(See Attached)



TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNIT 2
ASME SECTION XI, SYSTEM PRESSURE TEST PROGRAM
(SECOND INSPECTION INTERVAL)

REVISION TO REQUEST FOR RELIEF 2-SPT-9
(CODE CASE N-498-2)

SYSTEMS - Various, American Society of Mechanical Engineers (ASME) Section XI

DRAWINGS - Various

COMPONENTS - Class 1, 2, and 3 pressure retaining components

CODE CLASS - 1, 2, and 3

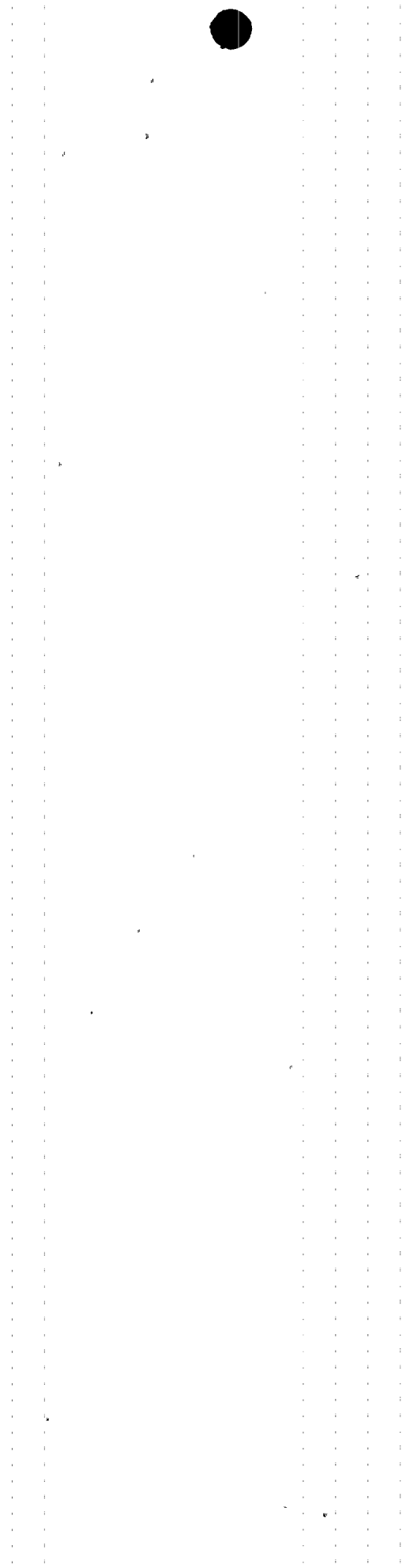
FUNCTION - Pressure retaining boundary

ASME CODE REQUIREMENT(S) - ASME Section XI, 1986 Edition (no Addenda), 10-Year System Hydrostatic Testing for Class 1, 2, and 3 Systems. Table IWB-2500-1, Category B-P; Table IWC-2500-1, Category C-H; and Table IWD-2500-1, Categories D-A, D-B, and D-C.

BASIS FOR RELIEF - In accordance with 10 CFR 50.55a(a) (3) (i and ii) TVA proposes to use ASME Code Case N-498-2, "Alternative Rules for 10-Year System Hydrostatic Testing for Class 1, 2, and 3 Systems, Section XI, Division 1," as an alternative to the ASME Section XI requirements specified above. ASME Code Case N-498 has been accepted by NRC as listed in Regulatory Guide 1.147, Revision 11, "Inservice Inspection Code Case



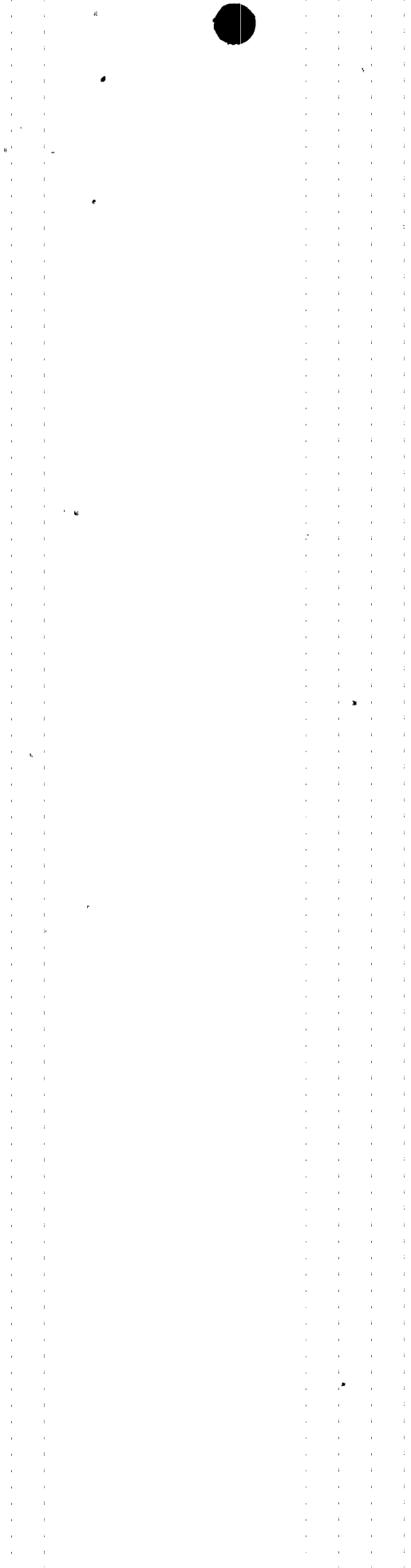
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Acceptability ASME Section XI Division 1," dated October 1, 1994. This Code Case allows the use of an inservice leakage test instead of a hydrostatic pressure test when performing the required 10-year pressure test for Class 1 and 2 systems. ASME Code Case N-498-1 extends the use of this alternate test method to Class 3 systems and N-498-2, removes the hold time (a minimum of four hours for insulated systems and ten minutes for noninsulated systems) at nominal operating pressure before performing the VT-2 visual examination.

ASME Code Case N-498-1 has been authorized for use for BFN Units 1, 2, and 3 by NRC letter from F. J. Hebdon to O. D. Kingsley dated August 18, 1995.

ASME Code Case N-498-2 removes the holding time requirements, before performing the VT-2 visual examination. Operating experience has shown that most leaks are discovered during normal system operation. Any apparent leakage will, in most cases, have already been identified. It is unlikely that any service induced leakage would be generated in this additional operating time. Also, system startup evolution requires time to attain and stabilize system conditions at nominal operating pressure and time is required to initiate and perform the system walkdown. Some amount of elapsed time is inherent in this process thereby allowing any existing leakage to occur. This is particularly true for primary (Class 1) piping systems. The Class 1 systems will have been under pressure for several hours prior to reaching full test pressure. Therefore, additional hold times would provide little or no added benefits. The probability of identification of additional leakage is considered small



and the benefits, if any, are not commensurate with the cost and plant operational delays imposed by the additional hold times.

The revision of Code Case N-498-1 (resulting in N-498-2) was intended to provide agreement with recent editions of the ASME Code. The hold times in question were removed in the 1995 Addenda to the 1995 Edition of the ASME Section XI Code. Code Case N-498-2 was issued to remove the unnecessary hold times after the applicable ASME Section XI Code paragraph had been revised.

TVA considers that the proposed alternative (Code Case N-498-2) provides an acceptable level of quality and safety. Further, compliance with the specified ASME Section XI Code requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

**ALTERNATIVE
TESTING**

- As an alternative to the existing ASME Section XI requirements, BFN will utilize the provisions of ASME Code Case N-498-2.

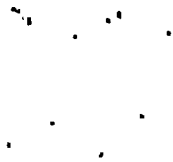


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TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNIT 2
ASME SECTION XI, SYSTEM PRESSURE TEST PROGRAM
(SECOND INSPECTION INTERVAL)

REQUEST FOR RELIEF 2-SPT-10
(CODE CASE N-546)

- SYSTEMS - Various American Society of Mechanical Engineers (ASME) Section XI
- DRAWINGS - Various
- COMPONENTS - Class 1, 2, and 3 pressure retaining components
- CODE CLASS - 1, 2, and 3
- FUNCTION - Pressure retaining boundary
- ASME CODE REQUIREMENT(S) - ASME Section XI, 1986 Edition (no Addenda), Subsection IWA-2300 requires that personnel performing VT-2 visual examinations be qualified and certified using a written, approved procedure prepared in accordance with SNT-TC-1A and the additional requirements of Division 1 of ASME Section XI.
- BASIS FOR RELIEF - In accordance with 10 CFR 50.55a(a)(3) (i and ii) TVA proposes to use an alternative to the ASME Section XI Code requirement specified above. The use of Code Case N-546 will allow experienced plant personnel to perform VT-2 visual examinations during the performance of system pressure tests and provide an acceptable level of quality and safety. Experienced plant personnel are knowledgeable of the plant systems and routinely perform walkdowns of plant systems looking for abnormalities such as leaks in



pipng systems. They are more familiar with the location of piping systems and can therefore perform VT-2 examinations in a more timely manner. Using experienced plant personnel will also eliminate the need for hiring additional personnel fully certified to IWA-2300. This is especially prevalent during refueling outages when pressure tests are performed and the number of IWA-2300 certified personnel are limited.

Since the VT-2 examination is a check for the evidence of leakage, the use of plant personnel certified to the N-546 alternative requirements, and who typically perform this type of examination during their daily activities, will not compromise the quality or safety of the systems examined.

Compliance with the specified ASME Code requirements would result in an undue hardship without a compensating increase in the level of quality and safety. TVA considers the ASME Code Case N-546 requirements to be an acceptable alternative to the qualification and certification of VT-2 (visual examination personnel) using a written, approved procedure prepared in accordance with SNT-TC-1A and the additional requirements of ASME Section XI, Division 1.

**ALTERNATIVE
TESTING**

- As an alternative to the existing ASME Section XI requirements, BFN will utilize the provisions of ASME Code Case N-546. Personnel must have at least 40 hours plant walkdown experience, such as that gained by licensed and non-licensed plant operators, local leak rate personnel, system engineers, and inspection and non-destructive examination personnel.

Individuals must have at least four hours of training in Section XI requirements and plant specific procedures for visual examinations.



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Each person must meet (annual) vision test requirements in accordance with the 1995 Edition of the ASME Section XI Code, Paragraph IWA-2321.



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TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNIT 2
ASME SECTION XI, SYSTEM PRESSURE TEST PROGRAM
(SECOND INSPECTION INTERVAL)

REQUEST FOR RELIEF 2-SPT-11
(CODE CASE N-566)

- SYSTEMS - Various, American Society of Mechanical Engineers (ASME) Section XI
- DRAWINGS - Various
- COMPONENTS - Class 1, 2, and 3 pressure retaining bolted connections
- CODE CLASS - 1, 2, and 3
- FUNCTION - Pressure retaining boundary
- ASME CODE REQUIREMENT(S) - ASME Section XI, 1986 Edition (no Addenda), IWA-5250 (a) (2) states, if leakage occurs at a bolted connection, the bolting shall be removed, VT-3 visually examined for corrosion, and evaluated in accordance with IWA-3100.
- BASIS FOR RELIEF - In accordance with 10 CFR 50.55a(a) (3) (i and ii) TVA proposes to use ASME Code Case N-566 as an alternative to the ASME Section XI requirements specified above. ASME Section XI inservice pressure tests are, as a rule, performed with the system in service. In particular, the Code Class 1 leakage tests are performed as the unit is returning to service following each refueling outage. The requirement to remove bolting from a mechanical connection when evidence of leakage is detected can create significant hardship on the plant which is not commensurate with the increase in the level of quality and safety that is provided.



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For systems that are aligned to normal plant operating configuration during testing, paragraph IWA-5250 (a)(2) may require the system be taken out of service and depressurized to permit removal of one of the bolts prior to any type of engineering analysis of the connection. Stoppage of the leakage and/or an engineering evaluation of the leak and the affected mechanical connection may be able to determine that sufficient structural integrity exists in the connection.

**ALTERNATIVE
TESTING**

- As an alternative to the existing ASME Section XI requirements, BFN will utilize the provisions of ASME Code Case N-566 which states that one of the following requirements shall be met for leakage at bolted connections:
 - a) The leakage shall be stopped and the bolting and component material shall be reviewed for joint integrity.
 - b) If the leakage is not stopped, the joint shall be evaluated in accordance with IWB-3142.4 for joint integrity. This evaluation shall include consideration of the number and condition of bolts, leaking medium, bolt and component material, system function, and leakage monitoring.



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TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNIT 2
ASME SECTION XI, SYSTEM PRESSURE TEST PROGRAM
(SECOND INSPECTION INTERVAL)

REQUEST FOR RELIEF 2-SPT-12
(CODE CASE N-522)

- SYSTEMS - Systems outside the scope of ASME Section XI except for their Class 2 piping and isolation valves that penetrate containment.
- DRAWINGS - 2-47E822-1
2-47E852-1
2-47E852-2
2-47E856-2
- COMPONENTS - Piping That Penetrates a Containment Vessel
- CODE CLASS - 2
- FUNCTION - Pressure Retaining Boundary
- ASME CODE REQUIREMENT(S) - ASME Section XI, 1986 Edition (no Addenda), Table IWC-2500-1, Category C-H, requires visual VT-2 examinations during, a) IWC-5221, System Pressure Test During System Functional and System Inservice Tests and b) IWC-5222, System Hydrostatic Tests.
- BASIS FOR RELIEF - In accordance with 10 CFR 50.55a(a)(3)(i and ii) TVA proposes to use ASME Code Case N-522 as an alternative to the ASME Section XI requirements specified above. The 10 CFR 50, Appendix J program tests the primary containment pressure boundary and verifies the boundary integrity.

All piping and penetrations of primary containment are tested. This includes



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systems outside the scope of ASME Section XI, where their Class 2 piping and isolation valves penetrate containment.

Portions of the subject systems are classified as Class 2 since they are a piping system that penetrates primary containment. Therefore, for primary containment integrity purposes, the penetration piping and valves are important to nuclear safety. The actual system process functions are not safety-related and are not important to nuclear safety. Code Case N-522 acknowledges this and allows verification of the penetration piping and valve integrity per the containment testing program, as required by 10 CFR 50 Appendix J, instead of the IWC-5221/5222 pressure tests.

Leak rate testing for Unit 2 is performed in accordance with 10 CFR 50 Appendix J, Option B (performance based) at a minimum pressure of 49.6 psig (accident pressure).

Implementation of Code Case N-522 will eliminate the need for approval and maintenance of eight surveillance procedures. It will also eliminate craft, inspector, operations, and engineering manhours and the radiation exposure associated with performance of the tests (estimated at 400 man-hours and 1 manrem, respectively).

The pressure retaining function of these lines and valves are verified by the Appendix J program. Redundant testing provides little additional benefit in quality or safety while expending significant resources and additional radiation exposures.

ALTERNATIVE TESTING

- As an alternative to the existing Section XI, Table IWC-2500-1, Category C-H requirements, BFN will utilize the provisions of ASME Code Case N-522 which states that 10 CFR 50, Appendix J test results may be used.



1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

ENCLOSURE 2

TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNIT 2

AMERICAN SOCIETY OF MECHANICAL ENGINEERS ASME SECTION XI
INSERVICE INSPECTION (ISI) PROGRAM
(SECOND INSPECTION INTERVAL)

REQUEST FOR RELIEF TO SUPPORT THE CYCLE 9 REFUELING OUTAGE

(See Attached)



7-2-4

Tennessee Valley Authority
Browns Ferry Nuclear Plant (BFN)
Unit 2
ASME SECTION XI INSERVICE INSPECTION PROGRAM
(SECOND INSPECTION INTERVAL)

REQUEST FOR RELIEF 2-ISI-7 (REVISED)

UNIT - BFN Unit 2

COMPONENTS - Class 1 and 2 Integral Welded Attachments

ASME
CODE CLASS - 1 and 2

EXAMINATION
CATEGORY - B-K-1 and C-C

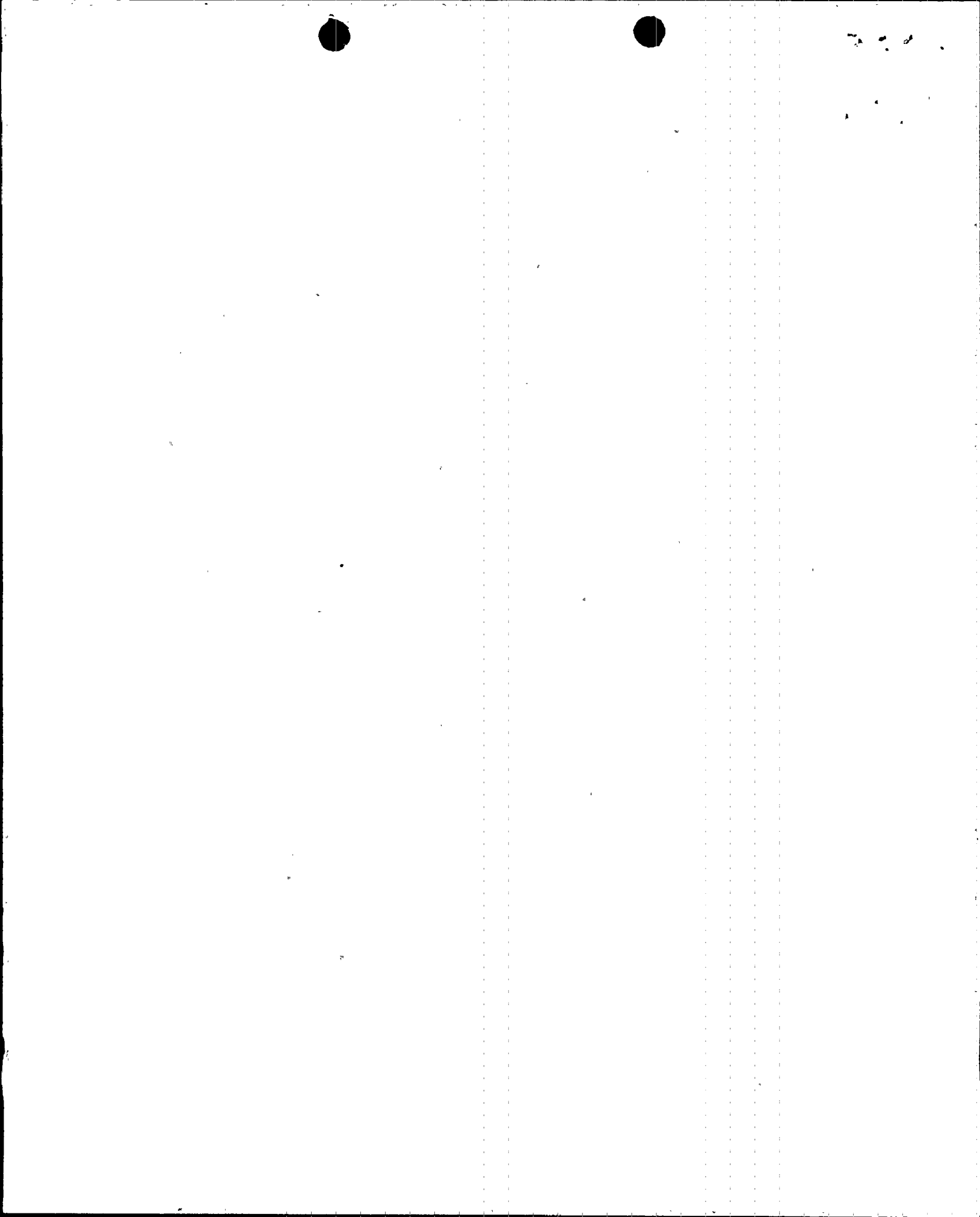
ITEM NUMBER - B10.10, C3.20

ASME CODE
REQUIREMENT(S) - ASME Section XI, 1986 Edition (no addenda),
Table IWB-2500-1, Examination Category B-K-1
integrally welded attachments greater than or
equal to 5/8 inch thickness, Figure IWB-2500-15.

ASME Section XI, 1986 Edition (no addenda),
Table IWC-2500-1, Examination Category C-C
integrally welded attachments greater than or
equal to 3/4-inch thickness, Figure IWC-2500-5.

BASIS FOR RELIEF - In accordance with 10 CFR 50.55a
(a)(3)(i and ii) TVA proposes to use an
alternative to the ASME Code requirements
specified above. Relief is requested from:

(1) ASME Section XI, Table IWB-2500-1,
requirement to perform a volumetric or surface
examination, as applicable, of essentially 100
percent of the examination volume/area.



(2) ASME Section XI, Table IWC-2500-1, requirement to perform a surface examination of 100 percent of required areas of each welded attachment.

TVA is requesting relief from ASME Section XI, 1986 Edition (no addenda) requirements related to the 100 percent examination of the required weld and base material volume required by Figure IWB-2500-15 for Examination Category B-K-1 integrally welded supports. The supports shall be identified after each outage in which examinations are performed, and an updated list of integrally welded supports shall be prepared each inspection period and incorporated into this request for relief. Examination of the accessible areas of the integral attachment welds with out removal of support members would result in estimated savings of approximately \$110,000 for personnel and materials, and approximately 150 man-rems of exposure, which equates to \$1,500,000 during the remaining BFN Unit 2 inservice inspection intervals for a total savings of \$1.6 million dollars.

ASME Section XI, 1986 Edition (no Addenda), Table IWB-2500-1, Examination Category B-K-1, Item Number B10.10, requires examination of essentially 100 percent of the weld and base material for integrally welded attachments and Table IWC-2500-1, Examination Category C-C, Item Number C3.20, requires examination of 100 percent of required areas of each welded attachment. In some cases this examination would require the removal of support members to achieve the coverage required by the ASME Code. Estimated duration for activities associated with the temporary removal of these ASME Class 1 and 2 supports for the examination of integrally welded attachments with an estimate to perform the Code required examination, and associated man-hours, dose, and overall costs are listed below:



100
100
100

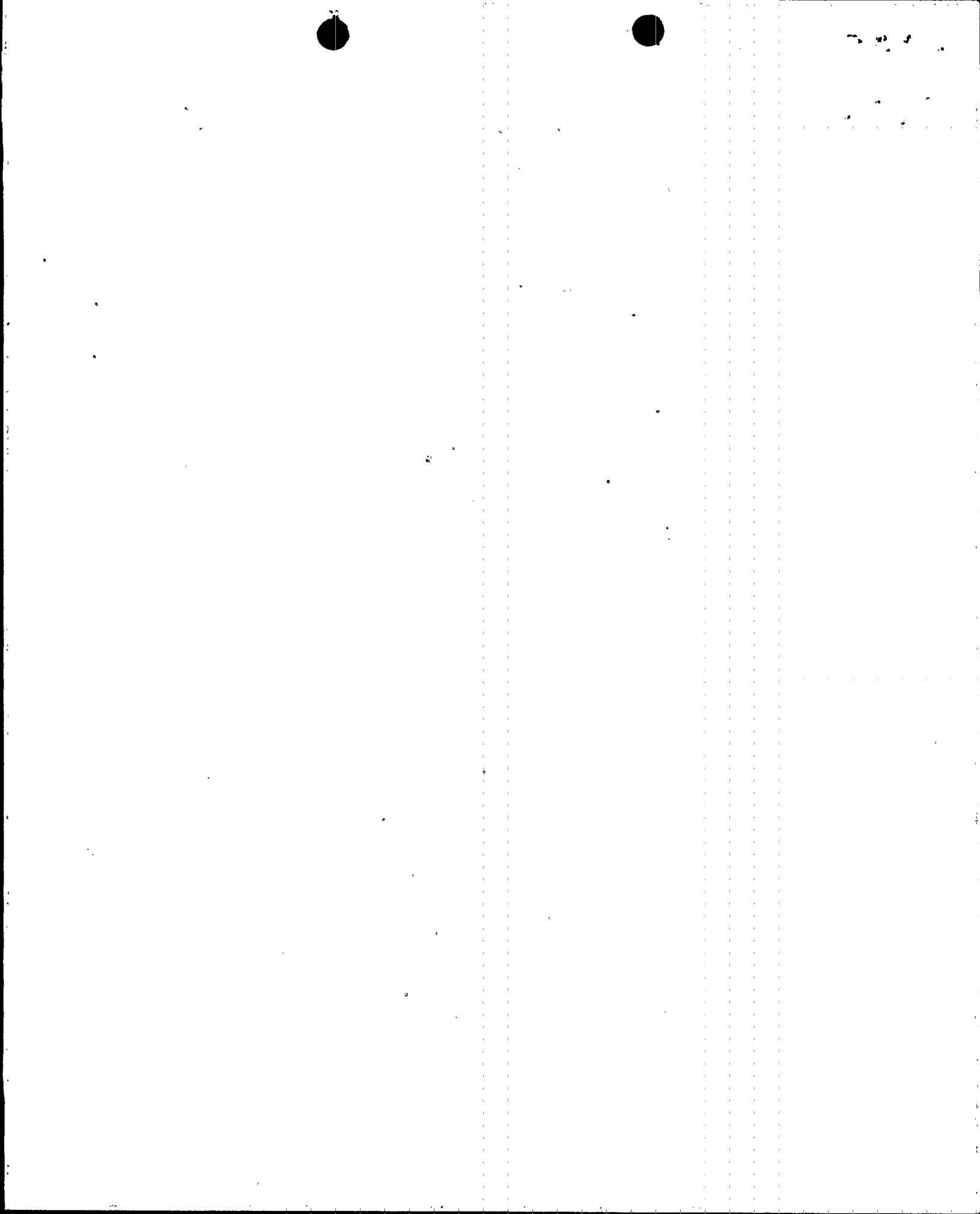
<u>Activity</u>	<u>Duration</u> (man-hrs)
Engineering evaluation of temporary support	20
Craft time for support member removal, installation of temporary support, and support reinstallation	100
Quality Control verification of activity	5

An average man hour cost of \$35/hour was utilized for the estimate along with approximately 25 supports requiring temporary removal for the current inspection interval. An average drywell exposure rate of 50 mrem/hr was utilized for the man-rem exposure estimate. These values result in estimated savings of approximately \$110,000 for personnel and materials. A cost of \$10,000 per man-rem for the 150 man-rem of exposure estimated during the remaining inservice inspection intervals for Unit 2 would result in a savings of \$1,500,000.

The Code of record requires examination of 100 percent of the Class 1 integrally welded attachments subject to examination which precludes selection of alternate integrally welded attachments without interferences to meet ASME Code requirements.

The 25 Class 1 supports estimated as requiring disassembly to conduct the examination of the integrally welded attachments represent approximately 45 percent of the total number of integrally welded supports in this Code category subject to examination.

The Class 2 integrally welded attachment supports are those examined in accordance with Examination Categories C-F and C-G. The Class 2 supports that would require disassembly to conduct the examination will be evaluated during each inspection period



for Code coverage achieved on all accessible areas and the areas that cannot be examined, without disassembly. Integral attachments where examinations could not be performed and reduction in coverage would be greater than 10 percent would become a part of this request for relief with relevant information identified as an attachment to this request for relief.

The limitations encountered during performance of the surface examination are caused by component configuration. Based on a construction permit date issued prior to January 1, 1971, for BFN Unit 2 and as required by 10 CFR 50.55a(g)(1) and 10 CFR 50.55a(g)(4), BFN must meet the requirements of ASME Section XI, except design and access provisions, to the extent practical within the limitations of design, geometry, and materials of construction of the components. BFN Unit 2 was not designed to provide access for ASME Section XI examinations.

The surface examinations of the subject integral attachments from the accessible surfaces provide an effective assessment of the integral attachment's structural integrity.

**ALTERNATE
EXAMINATIONS**

- Perform the required examination method from Table IWB-2500-1, Examination Category B-K-1, Item Number B10.10 on the accessible examination volume/area of the support integral attachment without removal of support members.

Perform the required surface examination from Table IWC-2500-1, Examination Category C-C, Item Number C3.20, on the accessible areas of the support integral attachment without removal of support members.

The examination of the accessible areas without removal of support members was approved for a future Code revision by the ASME Section XI committee during their March 1995 meeting and incorporated into the 1995 ASME Section XI Addenda.

