

SEP 21 1976

F. J. Long, Chief, Reactor Operations  
and Nuclear Support Division, IE:II

INSERVICE INSPECTION OF CLASS 2 PIPING, CRYSTAL RIVER UNIT NO. 3  
DOCKET NO. 50-302 (REVISED 1046H1)

We have reviewed the recommendation transmitted with the subject  
action item, and the referenced inspection reports, and have the  
following comments.

1. NRC is making a vigorous effort to implement the standardization  
concept with respect to Technical Specifications, and is very  
reluctant to add unique special requirements which apply only  
to a specific part of the facility.
2. Although the preservice examination may be performed to Section  
XI 1971 with Addenda through Winter 1972, 10 CFR 50.55a(g) requires  
periodic updating of the ISI program.
3. UT is still a developing technique, and "geometric" reflectors  
are not uncommon. It appears to us that the licensee has given  
much further than most organizations in supporting the conclusion  
that the reflectors are geometric indications rather than flaws.
4. We note in Report 50-302/76-2 (page I-2) that some ultrasonic  
reflectors ". . . appeared to have grown, i.e., increased in  
length . . ." between examinations conducted before and after  
hydrostatic test. We find no further discussion of this observation.

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In our opinion, this observation requires resolution by IE:II and the licensee. It has been suggested that the reflectors may be small enough to be acceptable to the Code Rules under which the examination was conducted.

Even though the flaws may be of an acceptable size, we believe the situation warrants further investigation, since the code definition of "acceptable" flaw size is intended to accept only those flaws which would not reasonably be expected to grow during the service life of the component. If reflectors of "acceptable" size are, in fact, growing as a result of one pressure cycle, it would appear necessary to reconsider their acceptability.

It was also been suggested that the apparent increase in reflector size may not be real, and may represent apparent differences which are in reality within the limits of measurement accuracy. Whatever the facts are, we believe that the subject needs to be resolved by IE:II and documented in a future inspection report.

Original signed by  
K. Seyfrit

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