

SNUPPS

Standardized Nuclear Unit
Power Plant System

5 Choke Cherry Road
Rockville, Maryland 20850
(301) 899-6010

Nicholas A. Petrick
Executive Director

May 11, 1981

SLNRC 81- 29 FILE: 0278.1
SUBJ: Request for Use of ASME
Section III Code Case N-275

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

References: STN 50-482, STN 50-483, STN 50-486

Dear Mr. Denton:

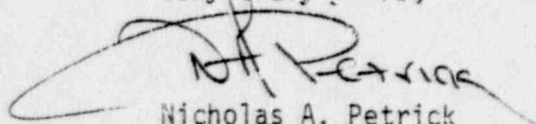
This letter is submitted on behalf of Kansas Gas and Electric Company, Kansas City Power & Light Company and Union Electric Company to request the concurrence of the Nuclear Regulatory Commission to use the following ASME Section III Code Case on the referenced SNUPPS Projects:

Code Case N-275 Entitled "Repair of Welds Section III Division 1"

Although not currently listed in Regulatory Guides 1.84 and 1.85 as an applicable code case revision, the subject ruling has been prepared and issued to provide clarification where the full thickness of the weld is removed and the back side of the weld joint assembly is not accessible for removal of examination materials.

NRC concurrence is requested for SNUPPS use of Code Case N-275.

Very truly yours,



Nicholas A. Petrick

CWH/srz

Attachments

cc: J. K. Bryan UE
G. L. Koester KGE
D. T. McPhee KCPL
Record

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DANIEL CONSTRUCTION COMPANY

CALLAWAY PLANT
P. O. BOX 108
FULTON, MISSOURI 65251
(314) 676-3111

March 9, 1981
DLUC - 6207
Required Response Date - 3/23/81

Union Electric Company
P. O. Box 149 (Code 470)
St. Louis, MO 63166

ATTENTION: W. H. Weber
Manager, Nuclear Construction

SUBJECT: Code Case N-275

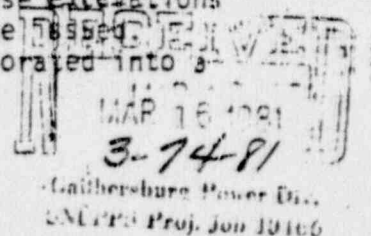
REFERENCE: ASME Section III NB/NC/ND/NE/NF/NG-4453.1

Dear Walt:

The subject Code Case provides clarification for examination of areas prepared for weld repair when the full thickness of the weld is removed and the back side of the weld joint assembly is not accessible for removal of examination materials.

It has not been Daniel's practice at the Callaway/Wolf Creek Projects to PT/MT examine excavated areas of full penetration butt welds when the excavation is performed to remove defects detected by RT and the excavation removes the full thickness of the weld, thus re-establishing a root gap. ASME Section III addresses NDE requirements for weld excavations prior to repair in ASME Section III, paragraph NB/NC/ND/NE/NF/NG-4453.1. The applicability of this requirement to welds that are excavated through the root was the subject of an inquiry made to ASME on September 8, 1980. A copy of the inquiry is attached.

A formal response to the inquiry was not received; however, the DIC Corporate Manager of Technical Services did receive an explanation from F. W. Moschini, ASME Chairman - Subgroup on Fabrication and Examination (Sec. III), via telephone. Mr. Moschini stated that an ASME Code Case (N-275) now specifically addresses the requirement for NDE of the repair excavations in question. It was Mr. Moschini's opinion that paragraph NB/NC/ND/NE/NF/NG-4453.1 was not initially intended to be applicable to excavations extending through the weld root and since there is now a Code Case clearly establishing the requirement pertaining to these excavations, a formal response to the aforementioned inquiry would not be necessary. Mr. Moschini indicated that Code Case N-275 would be incorporated into a later addenda of the code.



Based on the above information, DIC requests Bechtel and Westinghouse concurrence of the following action relative to repair excavations extending through the root of weld joint assemblies.

1. Code Case N-275 should be adhered to on future repairs. Since the Code Case clearly establishes the rule for excavations through the root pass, DIC would begin to implement the Code Case upon Bechtel and Westinghouse approval.
2. Code Case N-275 should be incorporated into the applicable design specifications. This would clearly establish project requirements for repair excavations extending through the root pass.
3. Repairs made previous to this date have been in conformance with Code Case N-275 with the exception that excavations extending through the root of joints with the back side accessible for removal of examination materials have not been examined by PT/MT. Previously completed and accepted repairs should be considered acceptable without an attempt to retrofit this part of the Code Case.

The following justification is provided for acceptance:

- A. The requirement to treat excavations of weld joints with accessible internal surfaces differently from joints with inaccessible internal surfaces does not become a requirement until completion of recommended action item No. 2 above. It is not established by the present requirement of NB/NC/ND/NE/NF/NG-4453.1 that they be treated differently.
- B. Excavations and repairs with accessible internal surfaces have been inspected, at minimum, to the same extent as repairs and excavations with inaccessible internal surfaces.

Concurrence of the Authorized Inspection Agency (HSBI & I Co.) Special Inspection Services Regional Representative has been obtained from DIC Corporate Manager, Technical Services for Item No. 3 above.

By direct copy of this DLUC, we request Bechtel and Westinghouse to expedite their review and approval of the above items.

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If you have any questions concerning the above, or additional information is required, please advise.

Very truly yours,

 3/12/81

H. J. Starr
Project Manager

left copy
HJS:JAH:JUL:psc

Attachment

CC: W. L. Petrie
J. H. Smith
D. F. Schnell
J. A. Holland
S. Martinez
D. Schofield
J. J. Long
File (A11.56)

**CASE
N-275****CASES OF ASME BOILER AND PRESSURE VESSEL CODE**

*Meeting of March 7, 1980
Approved by Council, May 15, 1980*

*This Case shall expire on May 15, 1983
unless previously annulled or reaffirmed.*

**Case N-275
Repair of Welds
Section III, Division 1**

Inquiry: What alternative rules may be used for the examination of the area prepared for repair of welds in lieu of the requirements of NB/NC/ND/NE/NF/NG-4453.1 for Section III, Division 1 construction where the full thickness of the weld is removed and where the back side of the weld joint assembly is not accessible for removal of examination materials?

Reply: It is the opinion of the Committee that the following rules for the examination of the area prepared for repair of welds may be used in lieu of the require-

ments of NB/NC/ND/NE/NF/NG-4453.1 for Section III, Division 1 construction:

(1) Unacceptable indications shall be removed by mechanical means or by thermal gouging methods.

(2) The area prepared for repair shall be examined by the liquid penetrant or magnetic particle method in accordance with NB/NC/ND/NE/NF/NG-5110 and shall meet the acceptance standards of NB/NC/ND/NE/NF/NG-5300 except that the examination is not required where the full thickness of the weld is removed and where the back side of the weld joint assembly is not accessible for removal of examination materials.

(3) The completed weld repair shall be examined in accordance with NB/NC/ND/NE/NF/NG-4453.4.

POOR ORIGINAL

File: A-2-2 *C*

DANIEL CONSTRUCTION COMPANY
DANIEL BUILDING
GREENVILLE, SOUTH CAROLINA 29602
(803) 298-2500

Sept. 8, 1980

ASME
United Engineering Center
345 East 47th Street
New York, N. Y. 10017

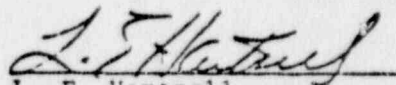
Attention: Mr. J. Millman
Secretary Subcommittee on Nuclear Power

Dear Sir:

Your response to the following inquiry is requested.

Do the examination requirements of ASME Section III paragraph NB-4453.1 apply when the excavation of a defect detected by RT of a full penetration circumferential pipe butt weld made without backing results in the weld being removed through its full thickness in the area of the defect thus reestablishing a root gap at this location? Other conditions applicable to the joint in question are:

- 1) The inside surface of the weld adjacent to the excavation is inaccessible.
- 2) The repaired area will be examined by RT.


L. E. Hartsell
Manager, Technical Services

LEH/lb

cc: J. Roach
H. Clark
L. Pardi
J. Long



POOR ORIGINAL