

August 13, 1990

MEMORANDUM FOR: Lawrence C. Shao, Director
Division of Engineering
Office of Nuclear Regulatory Research

FROM: Edward L. Jordan, Chairman
Committee to Review Generic Requirements

SUBJECT: REGULATORY GUIDES 1.84 (DESIGN AND FABRICATION CODE
CASE ACCEPTABILITY), 1.85 (MATERIALS CODE CASE
ACCEPTABILITY) AND 1.147 (INSERVICE INSPECTION
CODE CASE ACCEPTABILITY)

This is in response to your memorandum to me dated April 26, 1990, requesting CRGR endorsement for publication of the subject regulatory guides.

As a result of discussions at CRGR Meeting No. 125 it was agreed that regulatory guides endorsing ASME Code Cases need CRGR review only when they take exception to the Code Cases.

The proposed revisions to Regulatory Guides 1.84 and 1.85 do not take any exceptions and thus do not require CRGR review.

Proposed Revision 8 to Regulatory Guide 1.147 takes only one exception, which deals with ultrasonic testing (UT) of piping. In response to an inquiry regarding what alternative wall thickness or pipe schedules may be used in selecting UT calibration blocks, Code Case N-461 indicates that any calibration block thickness within + 25% of pipe wall may be used. The proposed exception would add a condition that the thickness measurements and weld joint contour of the pipe/component must be known and used by the inspector.

Dennis Allison of the CRGR staff has reviewed the exception and discussed it with E. Woolridge (RES), R. Hermann (NRR), and J. Coley (RII). The purpose of the exception is to help ensure that inspectors know where, on their screens, indications of interest would appear. When the code thickness requirements on calibration blocks are relaxed from + 12.5% to + 25% by using the Code Case, the potential for error in this regard is increased. The staff exceptions would require that, in these circumstances, inspectors know and use the actual pipe thickness and contour. Thus, they will be equipped to avoid errors. In most cases, thickness measurements and contours have already been obtained during preservice inspections. Where this is not the case, the burden of obtaining them would be slight. This exception does not appear to be a backfit because it merely specifies precautions to be employed when using the code case - a voluntary option that relaxes current requirements.

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In an enclosure to your memorandum, you stated that the exception "... does not expand on the Code Case Requirements, but it ensures that the UT procedures to be followed are adequate..." Based on this consideration and the CRGR staff review and in accordance with the CRGR Charter, there is no need for further formal review of this proposal by the Committee.

Original Signed by:
E. L. Jordan

Edward L. Jordan, Chairman
Committee to Review Generic
Requirements

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