

PT - Sharon

BWR OWNERS' GROUP

Lesley A. England, Chairman
Tel: (504) 381-4145

BWROG-94035
March 23, 1994

c/o Gulf States Utilities Company • P.O. Box 220 • St. Francisville, LA 70775 • Fax: (504) 635-5068

U. S. Nuclear Regulatory Commission
NRC Public Document Room
Washington, DC 20555-0001

Attention: William T. Russell
Director, Office of Nuclear Reactor Regulation

Subject: **TRANSITION FROM BWROG IGSCC QUALIFICATION PROGRAM TO
PERFORMANCE DEMONSTRATION INITIATIVE**

At the January 5, 1994, meeting between the NRC and the BWR Owners' Group (BWROG), the NRC indicated their desire for a smooth transition from the current method of qualifying examiners for intergranular stress corrosion cracking (IGSCC) inspections to the method specified by Appendices VII and VIII of Section XI of the ASME Code. The BWROG shares that desire, and in this letter proposes a simple method of achieving this and requests NRC concurrence.

As you know, training and qualification of examiners and procedures for application to BWR stainless steel piping weldments are currently governed by the "IGSCC Coordination Plan," also referred to as the "Three Party Agreement." The IGSCC Coordination Plan was jointly developed and approved by the NRC, EPRI and the BWR Owners' Group on IGSCC Research (this latter organization's role has since been assumed by the BWROG). The Coordination Plan has functioned well while exemplifying the cooperative efforts of NRC and industry to address the IGSCC issue. Now, with the passage of ASME Section XI Appendices VII and VIII and the formation of Performance Demonstration Initiative (PDI), changes are necessary to accommodate the transition to Appendices VII and VIII. The new qualification program can and should effectively build on the foundation established by the current program, and therefore the BWROG supports the efforts of PDI to develop an integrated examiner qualification program that makes use of the appropriate portions of the current program including the changes described later in this letter.

Several years ago, the nuclear utilities formed PDI to develop a generic program for industry compliance with the ASME Section XI, Appendix VIII non-destructive examination (NDE) qualification requirements. At that time, the NRC indicated they planned to include a requirement to expedite the implementation of the Appendix VII

9404220153 940323
PDR TOPRP EMVGENE
C PDR
200000

GODZ 1/1

and VIII requirements of the 1989 Edition of ASME Section XI with the 1989 Addenda in future rulemaking. After discussions between PDI and NRC, a target date was established for PDI to be prepared to meet the requirements of Appendices VII and VIII. This has involved the expenditure of millions of dollars to establish the organization, develop examination and program procedures, and procure and manufacture test specimens. PDI will provide standardized protocol for the NDE examiners to demonstrate their proficiency on all applicable piping, bolting and reactor pressure vessels, not merely IGSCC-susceptible piping. This is a more effective and comprehensive approach for both the utilities and the NRC.

It is the BWROG's understanding that initial qualification testing under the PDI process is scheduled to commence in April 1994. It is further understood that the EPRI NDE Center resources will be dedicated to this process (thus limiting availability of resources for IGSCC-only tests) and that it will be approximately January 1996 or later before each examiner has the opportunity to go through the qualification testing. If the BWR IGSCC examiners are also required to maintain their existing IGSCC certifications while doing examinations and PDI testing, the cost to utilities would be unnecessarily excessive and the availability of NDE Center resources would be depleted. EPRI NDE Center personnel estimate that approximately 250 examiners will require recertification during the remainder of 1994. At a cost of \$5000 per week per person, including labor, lodging, and NDE Center fees, the industry will spend \$1.25 million for IGSCC recertification. This does not include the PDI work. At the same time, many of those same examiners will be trying to work outages and train/test under the new PDI protocol in anticipation of the future requirements. Failure to do so either jeopardizes current outage in-service inspection (ISI) work or seriously hampers the ability to perform ISI in future outages. This situation will result in examiners testing under two separate systems while using the same training facility and testing resources. It will almost double the amount of testing time per examiner without commensurate benefits.

To effect a smooth transition into the PDI program and avoid the problems identified above, EPRI and the BWROG propose minor revisions to the protocol document, "Utility Industry Personnel Qualification Guidelines for Detection and Sizing of Intergranular Stress Corrosion Cracking" ("Qualification Guidelines"), which is the implementing procedure associated with the Coordination Plan. The proposed revisions are believed to be the simplest and most effective means of facilitating this transition without negatively impacting examiner integrity. Examiner integrity will be maintained by continued field experience, participation in the PDI qualification process, and owner's written procedures and qualification program requirements. The changes proposed are detailed in the attachment and summarized below.

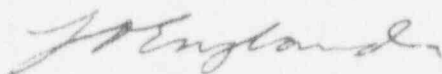
The changes under consideration would: 1) extend the requalification period from three years to five years, and 2) allow IGSCC training to be completed either through

the EPRI NDE Center or as part of an owner's (or inspection vendor's) Appendix VII training program. The extension of the requalification period would be applicable to any individual that was listed in the IGSCC Registry as of **March 1, 1994**. Individuals whose certifications expired prior to that date or individuals being certified for the first time would have to **qualify under the current program**. Extension of the requalification period is necessary to allow time for personnel qualified under the current IGSCC Coordination Plan **to complete their requalification under PDI**. The provision to permit training via an owner's Appendix VII training program is needed to permit progression into the Appendix VIII requirements.

Changes to the Coordination Plan require the approval of all three parties (EPRI, NRC and BWROG). In this case, however, the proposed changes **are to the implementing document**, not the Coordination Plan, and therefore NRC approval is not required. However, in the spirit of the plan, we request NRC's concurrence with the proposed changes.

EPRI and the BWROG believe that the changes described above will best accomplish the needed transition in the best manner. Because of the impact on utility planning and resources, EPRI, the BWROG and PDI plan to implement the changes described above by **April 15, 1994**, and therefore NRC's concurrence with the changes is requested by that date. Please contact either Robin Dyle (BWROG Materials Issues Coordination Committee Chairman, 205-877-7121), Bill Zarbis (GE, BWROG Projects, 408-925-5070), John Lindberg (PDI/BWROG Liaison, 717-542-3875) or the undersigned if we can be of any assistance.

Very truly yours,



L. A. England, Chairman
BWR Owners' Group

Attachments
WAZ/LAE/waz

cc: R. A. Pinelli, BWROG Vice Chairman
BWROG Executive Oversight Committee
BWROG Primary Representatives
R. L. Dyle, SNC
J. T. Lindberg, PP&L
S. J. Stark, GE
W. A. Zarbis, GE
J. Strosnider, NRC-EMCB/NRR

ATTACHMENT

PROPOSED CHANGES TO "UTILITY INDUSTRY PERSONNEL
QUALIFICATION GUIDELINES FOR DETECTION AND SIZING
OF INTERGRANULAR STRESS CORROSION CRACKING"

A copy of the pertinent page from the document identified above is attached. Provided below are specific changes to the document, to effect a smooth transition from the current IGSCC qualification program into PDI. Changed areas are shown in italics where revised by rewording or deletion. Added words are underlined. No other changes are proposed. This is applicable for detection, sizing and overlay qualifications.

Initial Qualification

The specific requirements for individuals included initially on the registry are as follows:

- o Successfully complete the practical examination provided *by the EPRI NDE Center program.*
- o Successfully complete the general and specific written examinations provided *by the EPRI NDE Center program.*
- o Attend an EPRI NDE Center or owner's/vendor's Appendix VII training course in the area of qualification.

Basis for change: The changes will permit owners (or inspection vendors) the option of using IGSCC training programs other than the EPRI NDE Center training. The training program could be either owner-developed or owner-approved. IGSCC training would become part of the owner's (or the inspection vendor's) Appendix VII training program. This change follows the Appendix VII-Appendix VIII interrelationship. Testing will still be accomplished at the EPRI NDE Center.

Requalification

For an individual's name to be maintained on the qualification registry, the following requirements must be met:

- o Have a current, within five years, specific and practical examination administered by the EPRI NDE Center, and

Basis for change: This change would permit a smoother transition into the Appendix VIII qualification program. **It provides sufficient time for personnel currently qualified in IGSCC flaw detection, sizing and overlay inspections to requalify through PDI as part of their Appendix VIII qualification without having to perform duplicative IGSCC testing.** This also allows time for PDI and NRC to resolve any issues related to the acceptance of the PDI program.

Qualification Registry

The qualification registry provides the utilities with a comprehensive, up-to-date listing of personnel qualified in accordance with the Coordination Plan for NRC/EPRI/BWROG Training and Qualification Activities of NDE Personnel. This plan references the competency requirements set forth in the EPRI NDE Center training program manuals. There are currently two registries maintained in accordance with the Coordination Plan:

- UT Operator Training for Detection of Intergranular Stress-Corrosion Cracking (IGSCC), and
- UT Operator Training for Planar Flaw Sizing.

Requirements

Initial Qualification

The specific requirements for individuals included initially on the registry are as follows:

- * • Successfully complete the practical examination provided ~~as part of the EPRI NDE Center's training program.~~
- * • Successfully complete the general and specific written examinations provided ~~as part of the EPRI NDE Center's training program.~~
- + • Attend an EPRI NDE Center training course in the area of qualification, ~~or another course that meets NRC approval.~~
- Provide the EPRI NDE Center with documentation of Level II (or equivalent) qualification in ultrasonic testing.
- Provide the EPRI NDE Center with a copy of the procedure used to perform the practical examination.

Requalification

For an individual's name to be maintained on the qualification registry, the following requirements must be met:

- + • Have a current, within ~~three~~ years, specific and practical examination administered by the EPRI NDE Center, and
- Have a current, within three years, general examination administered by either the EPRI NDE Center or the individual's employer.

Qualification Categories

There are two basic categories of qualification as defined by the registry. These categories are manual and system. System categories are subdivided into two major classes, automatic and semiautomatic. The system classes are further divided depending upon the particular type of qualification.

Additionally, qualification can be "individual" or "team." Individual qualification, as the name implies, consists of a single candidate success-