

December 20, 1990

Docket Nos. 50-338
and 50-339

DISTRIBUTION

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Mr. W. L. Stewart
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Dear Mr. Stewart:

SUBJECT: NORTH ANNA UNITS 1 AND 2 - LICENSEE PROPOSAL FOR ALTERNATIVE
REQUIREMENTS FOR QUALIFICATION OF WELDERS AND PROCEDURES FOR
STRUCTURAL WELDING (TAC NOS. 73131 AND 73132)

By letter dated March 27, 1987, you proposed to the NRC alternative require-
ments for the qualification of welders and procedures for structural welding at
NA-1&2. The applicable American Society of Mechanical Engineers Boiler and
Pressure Vessel Code is the 1980 Edition through Winter 1981 Addenda (ASME).
Section XI, Article IWA-4000, "Repair Procedures" specifies in IWA-4120 that re-
pairs shall be performed in accordance with the Owner's Design Specification
and Construction Code. ASME IWA-4300 requires that welders and welding pro-
cedures be qualified in accordance with ASME Section XI. For structural welding
of supports at NA-1&2, the applicable Construction Code is the American Welding
Society's D1.1, "Structural Welding Code" (AWS D1.1). AWS D1.1 has specific
qualification requirements for welders of structural steel, in particular,
tubular steel, which is not addressed in the ASME Code. In addition, it uses
pre-qualified welding procedures for welding structural steel. Section IX
welding procedures are not specifically orientated towards structural steel,
and do not address qualification of welders of tubular steel.

The staff has reviewed your request for relief and finds you have not demon-
strated impracticality pursuant to 10 CFR 50.55a(g)(6)(i). We do, however,
agree that there is some technical merit to your argument. We believe you
should request the ASME to address situations where the Construction Code
for supports and repair/replacement of the components conflicts with the ASME
Code.

Sincerely,

(Original Signed By)

Leon B. Engle, Project Manager
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*LTR STEWART TACS 73131/73132

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Mr. W. L. Stewart
Virginia Electric & Power Company

North Anna Power Station
Units 1 and 2

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