



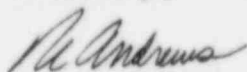
The NRC staff has determined that the volume accessible for examination from the nozzle-to-vessel external surface in addition to the volume examined from the nozzle-to-vessel internal surface will cover a sufficient amount of the volume required to be examined to provide a high degree of assurance that inservice flaws either do not exist, or will be detected in the vessel-to-nozzle weld and base metal.

Please note the words "in addition to" in the above evaluation. During the District's 1983 refueling outage, an examination of the nozzle-to-vessel welds was performed from the inner diameter of the nozzle just as stated in our exemption request. Our ISI vendor, in their final report, indicated no difficulty in achieving 100% weld volume coverage from the inner diameter. The District wishes to clarify that using the standard 0°, 45°, 60°, and 70° ultrasonic scans from the inner diameter, 100% of the code-required weld volume can be scanned.

Therefore, if the examination is deferred to the end of the 10-year interval, 100% of the code-required weld volume can be examined. Unlike the Code followed for the first ten-year interval, the 1980 edition of the Code allows deferral of the examination until the end of the interval. Further, the 1980 edition of the Code allows for either internal or external examination. Thus, the District does not believe an outer diameter examination, as prescribed in Reference 5 is required, and, based upon the 1980 edition of the Code, an exemption is no longer required either.

We respectfully request that this matter be clarified when you issue the final SER for the remaining ASME Boiler and Pressure Vessel Code exemption requests for the interval 1983-1993.

Sincerely,



R. L. Andrews  
Division Manager  
Nuclear Production

RLA/DJM/rh-M

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