

From: "Limberger, Wayne" <Wayne.Limberger@vynpc.com>  
To: "'abw@nrc.gov'" <abw@nrc.gov> *Admiral Dole*  
Date: 8/27/98 3:52pm  
Subject: Draft Transcript of VY-NRC Conference Call on 8/26/98

Attached is the subject draft and two attachments that support VY statements made during the telecon. This information is being provided for your use in preparing the conference call summary discussed during the conversation. Please give me a call at (802) 258-4237 if you have any questions. I will be out of the office tomorrow, in briefly on Monday morning, and then will be flying to Chicago for the NRC Stakeholders meeting on Tuesday.

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ENCLOSURE

Summary of VY-NRC Telecon Regarding VY's Code Case N-560 Submittal, August 26, 1998

Participants: (spelling uncertain)

NRC: A. Wong  
G(eorge) ?  
S. Dinsmore  
J. Anderson  
J. Trainor

VY: W. Limberger  
D. Girroir  
M. Dugan  
P. O'Regan

Start Time: ~1000

End Time: ~1100

Topics of Discussion Presented to VY on 8/24/98:

Qualification of NDE Examiners

Increased Training for NDE Examiners Performing Code Case N-560 Inspections

Expert Panel for Implementation of Code Case N-560

Applicability of Code Case N-560 to Augmented ISI Programs

NRC began by clarifying the issues requiring discussion, in the following order:

How was the expert panel formed and how was it called upon in applying the Code Case N-560 criteria?

How are the personnel performing ISI UT examinations qualified, especially with regard to Appendices VII and VIII of ASME Section XI?

Will personnel performing ISI UT examinations under Code case N-560 be better qualified than those performing standard Code-required examinations?

The fourth issue presented to VY on 8/24/98, regarding incorporation of the current augmented ISI programs into the Code Case N-560 risk-informed selection process, was characterized as "resolved" on the basis that it is outside the scope of the NRC's review of VY's submittal.

The "expert panel" question was tabled pending the availability of S. Dinsmore.

NRC, while acknowledging that commitment to Appendices VII and VIII of ASME Section XI is not mandatory for VY at this time, requested VY's position regarding their use.

VY provided the following overview regarding qualification of personnel:

VY doesn't rely on the NDE contractor to pick the inspection personnel; we pick them based on past demonstration of capability and typically get a high personnel return rate for each outage. We look for PDI qualification, even though Appendices VII and VIII have not been adopted yet. When they are adopted, VY expects to maintain substantially the same level of personnel qualification as we are proposing for the Code Case N-560 inspection program, and the main focus at that time will be on procedure updates. Although VY has qualified UT test coupons and trained personnel with them, we won't commit to comply with Appendix VIII until it is formally

adopted. We believe, however, that we presently meet the intent of Appendix VIII for personnel qualification.

NRC questioned VY regarding qualification practices for personnel performing thermal fatigue and flow accelerated corrosion (FAC) inspections (Ref. RAI Question 14).

VY responded that the same people perform the thermal fatigue and FAC inspections as perform the ASME Section XI ISI examinations (these people are typically IGSCC qualified), under the conditions given in our response to RAI Question 14.

NRC asked, relative to paragraph (b) on page 1 of Code Case N-560, whether VY assigns a reliability factor or number to the capability of personnel performing inspections under the Code Case. Also, whether VY has "minimum criteria" that inspectors must meet to be able to perform these examinations.

VY replied that we will seek PDI-qualified examiners for performance of these inspections, although this is not specifically required by the Code Case. Applying the expertise of our NDE Level III staff, we attain a "level of comfort" with the capabilities of all NDE examiners chosen to participate in ISI examinations. No numerical rankings are applied.

NRC suggested that a commitment on VY's part to use only PDI-qualified people might be appropriate.

VY replied that such a commitment would be beyond our licensing basis. VY is not committed to the 1989 Edition of ASME Section XI which imposes Appendices VII and VIII.

NRC asked whether ASME Section XI Appendix VII is applied to thermal fatigue and FAC inspections.

VY replied that it is not. VY is committed to the 1986 Edition of Section XI; Appendix VII was not incorporated until the 1989 Edition of the ASME Code, and VY is not required to comply with it at this time.

NRC requested that VY docket an agreement or understanding that we will continue to use PDI-qualified inspection personnel for examinations under Code Case N-560. It was generally agreed that this could be documented in the minutes of this telecon., and that NRC would generate a conference call summary based on VY's input.

VY responded that we will reaffirm that we use qualified people and procedures as required by the Code Case. Initial discussion in this regard focused on use of UT personnel with capabilities "similar to" but not necessarily "qualified to" PDI criteria, but VY's final statement was that we would confirm only that we will use qualified personnel and procedures as stipulated in the Code Case, since PDI qualification is not a requirement of the Code Case. (Attached to this draft is an expansion of VY's position statement.)

Regarding the augmented ISI programs in use at VY, NRC acknowledged that these programs are outside the scope of the present review, and VY affirmed that none of them are affected by the Code Case. VY stated that we will continue to meet all existing commitments regarding augmented inspection. This issue is considered to be "resolved" on the above basis.

**(NOTE: The following discussion occurred while waiting for S. Dinsmore to join the conversation to discuss expert panel provisions, and was not directly related to the originally-identified topics of discussion. Therefore, it is not intended to be part of the documented agreement.)**

NRC asked what VY thinks of the comprehensiveness of Code Case N-560, since it was noted that VY deviated from the Code Case in several places for apparently valid reasons and adopted the EPRI methodology instead. NRC needs to determine whether the Code case is adequate as it stands or whether additional regulatory requirements should be applied.

VY replied that a full-scale "lessons-learned" revision to the Code Case is underway, and will be accorded full Section XI consideration when completed. This effort is intended to avoid the need for additional regulatory action.

S. Dinsmore joined the discussion at this point.

NRC questioned VY regarding the qualification and involvement of "expert panel" personnel in selection of welds for examination under the Code Case.

VY replied that, following the risk-ranking of the total population of "Category B-J" welds, a Selection Team of personnel with the appropriate level of qualification and experience was assembled and participated in a two-day meeting for the purpose of choosing 10% of the in-scope Code Case N-560 Category B-J welds for examination. A description of the personnel and a brief summary of their qualifications was provided verbally, with an agreement to follow up with a written list as part of this draft. (The requested list is attached.)

NRC and VY summarized the action items from this telecon as follows:

VY will prepare a draft of the minutes of the discussion for NRC's use in preparing a conference call summary. This draft will address:

The methods used to qualify UT examiners, specifically considering ASME Section XI, Appendices VII and VIII.

Reaffirmation that the augmented ISI programs are not within the scope of this review.

The identity and qualifications of the people who participated in the "expert panel" for selection of welds.

The foregoing summary transcript satisfies this action item. VY agreed to e-mail this information to the NRC.

## Qualification of NDE Examiners for Performance of Code Case N-560 Inspections

Vermont Yankee will continue to assure the proficiency of NDE personnel performing examinations in accordance with the requirements of Code Case N-560 in the same manner as has been done for the performance of ASME Section XI NDE examinations. This will include the requirements of Procedure # YA-Q&C-1 R/10 "Procedure for Qualification and Certification of Nondestructive Examination Level I, Level II and Level II-R Personnel", Section 10.4, Paragraph 10.4 which states:

*"Significant changes in requirements, policies, and procedures applicable to the activity for which the individual is certified shall require reindoctration of NDE personnel. Appropriate documentation shall be made available to support this effort. Documentation may be by either memo or a standard form, dependent upon individual plant requirements; however, all such documentation must address:*

*Attendees*

*Date and duration of indoctrination*

*Subject matter*

*Instructor and requestor*

*The indoctrination may be provided by either qualified plant personnel or the NDE Level III (E) or designee."*

Currently, in anticipation of ASME Section XI, Appendix VII and VIII requirements, Vermont Yankee is utilizing, in most cases, ultrasonic detection and sizing Level II personnel who are qualified in accordance with some of the most current industry qualification programs. Vermont Yankee is the co-owner of a large selection of flawed ultrasonic qualification coupons that are used in conjunction with the qualification and certification program.

Also, prior to Code Case N-560 implementation Vermont Yankee will develop indoctrination training guidelines for instruction of NDE personnel in the specific degradation mechanisms and enhanced examination areas associated with each mechanism.

In short Vermont Yankee will continue to provide assurance of proficiency of NDE personnel, as has been done in the past, including any re-evaluation of NDE techniques, training or NDE results as may be required. This need will be determined through information provided as the result of, but not limited to, design changes, industry wide failure notifications and prior examination results.

## Vermont Yankee N560 Selection Process

A two day meeting was held to select the N560 inspection elements. The N560 inspection elements consisted of 10% of the B-J piping locations per the criteria defined in ASME Code Case N560. This meeting was attended by the individuals listed in Table 1. Table 1 also provides the areas of expertise as it pertains to each individual in attendance. Inputs to this meeting consisted of the consequence, degradation mechanism and risk ranking results. Meeting minutes were prepared and documented. The inspection locations selected for the N560 program were subsequently identified to the NRC.

**Table 1**

Mike Dugan	ISI Coordinator, NDE Level III
Rick Fougrousse	ISI, Degradation Mechanisms
Dennis Girroir	ISI Supervisor, SRO Certified
Scott Kulat	Metallurgy, NDE, ISI
Carl Larsen	NDE Level III
Clare Markovic	Metallurgy, Degradation Mechanisms
Pat O'Regan	PRA, Degradation Mechanisms, Stress Analysis
Pete Riccardella	Degradation Mechanisms, Stress Analysis
John Schaefer	ISI Coordinator
George Semienko	Degradation Mechanisms, Design Engineering, System Engineering
Russ Struthers	Support Services (insulation removal, scaffolding, weld prep)