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From: Tim Polich, US Nuclear Regulatory Commission
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Discussion items for teleconference at 10:00 am Eastern today.

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From the desk of...

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**IWE CONTAINMENT INSPECTION
OPEN ISSUES
COMANCHE PEAK, UNITS 1 AND 2**

1. In the licensee's submittal, the proposed alternative, as stated, is to use the "current ASME approved rewrite" of Subsections IWE and IWL. For the staff's preliminary evaluation, it was assumed that the licensee will use the latest published Edition of the Code. Verify that Comanche Peak intends to use the now published 1998 Edition of ASME Section XI, Subsections IWE and IWL. If not the 1998 Edition, what published Edition/Addenda of Section XI provides the overall basis for the proposed alternative?
2. The 1998 Edition eliminates the weld accessibility requirements of IWE-1231(a)(3) and IWE-1232(a)(3). Consequently, if a repair/replacement activity is performed, there is no requirement to maintain accessibility to the subject welds for examination. Explain why this change should be considered acceptable following a repair/replacement activity.
3. 1998 Section XI generally refers to IWA-2000, Examination and Inspection, when defining the general requirements for examinations to be performed, and for the qualification of examination personnel. The licensee's proposed alternative removes the IWA-2300 requirement to certify NDE personnel to CP-189. In addition, new Code examinations (General Visual and Detailed Visual) have been introduced. The definition of the new Code examinations has been left up to individual licensee's, and a licensee would be allowed to define how personnel performing these examinations are to be qualified. It is presently unclear how owner-defined visual examination programs, including items such as illumination and resolution requirements, acceptance criteria, and minimum personnel qualifications, may be individually developed and the necessary level of consistency maintained industry-wide. The staff considers this changed [1998 Edition] requirement to be inconsistent with other Code visual examination prerequisites, and too generic in nature.

To establish that the licensee's alternative provides an acceptable level of quality and safety, details of the Comanche Peak General and Detailed Visual examination program must be evaluated. Please submit the visual program, including attributes such as:

- Details of the owner-defined General Visual acceptance criteria that will be used to examine general containment surfaces, containment welds, bolting, moisture barriers, dissimilar metal welds, etc.
- Describe the Detailed Visual criteria used to address augmented examinations.
- Discuss how these examinations will provide the same level of quality and safety that is provided by the VT-1 and VT-3 examinations required by the 1992 Edition and Addenda.
- Describe the qualification requirements for personnel performing containment visual examinations.
- Describe the qualification requirements for personnel performing augmented ultrasonic examination of containment surfaces.

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4. The 1998 Edition added paragraph IWE-2412(b) to define the examination schedule requirements if items or welds are added to the Inspection Program. Explain the circumstances that would necessitate adding welds or components to the Inspection Program of Subsection IWE. How does adding welds or components in the Subsection IWE Inspection Program differ from adding welds or components as part of a plant modification for other Class 1, 2 or 3 ISI activities?
5. The 1992 Edition, Subsections IWB-3100, IWC-3100, and IWE-3100 have paragraphs for in-service examinations stating that the licensee's repair/replacement program and reexamination results shall be subject to review by the enforcement authority. Additionally, evaluation analyses of flaws or areas of degradation found acceptable by engineering evaluation shall be submitted to, or may be subject to review by, the regulatory authority. The 1998 Edition has systematically removed these paragraphs from IWE and IWL (i.e., IWE-3415, IWE-3125, IWL-3320). The licensee's comment regarding the significance of these changes was that "there were no submittal or retention requirements changed by the deletion of the subparagraph." Explain why similar requirements remain for Class 1, 2 and 3, yet are eliminated in IWE and IWL.
6. IWE-3500 of the 1992 Code describes general anomalies for visual examinations of containment components. If the described anomalies are discovered, the areas that are suspect shall be accepted by engineering evaluation or corrected by a repair/replacement activity. The 1998 Code has removed the requirement for engineering evaluation if the suspect area does not meet the acceptance standard for containment surfaces requiring augmented examination. Explain why the engineering evaluation is removed from IWE-3511.2, Visual Examination of Coated and Noncoated Areas (Examination Category E-C), and remains in IWE-3510.2, Visual Examination of Coated and Noncoated Areas (Examination Category E-A), and IWE-3511.3, Ultrasonic Examination (Examination Category E-C). Describe the course of action necessary if an augmented visual examination fails to meet the acceptance criteria using the 1998 Code.
7. The IWE rewrite submitted with the licensee's proposed alternative lists IWE-2310(e)(3) and (4) as criteria for detailed visual examination of (3) pressure retaining bolting and (4) moisture barriers. These criteria do not appear in the 1998 Edition. The 1998 Code appears to leave these components without suitable examination criteria. Is the licensee proposing to use the criteria [from 1992 Edition] submitted in the proposed alternative to augment this lack of information in the 1998 Edition?
8. IWE-2420(c), Successive Examinations, (92 Ed) requires areas containing flaws, areas of degradation, or repairs that were found acceptable by engineering evaluation, be reexamined during the next three inspection periods before it can be removed from the augmented examination requirements. This is consistent with the Subsection IWB-2420 requirements. The proposed alternative has reduced the observation time required to remove a suspect area from the augmented examination requirements. IWE-2420(c) (98 Ed) requires reexamination of areas containing flaws or areas of degradation, that have been accepted for continued service by engineering evaluation, during the next inspection period. If the suspect area is unchanged during the next period examination, the area no longer requires augmented examination. The licensee must submit a basis for why this reduction in the number of successive examinations provides an acceptable, or equivalent, level of quality and safety.

9. Examination Category E-D, Pressure Retaining Dissimilar Metal Welds, has been removed from Table IWB-2500-1. The 1998 Edition, Examination Category E-A, does not specifically address dissimilar metal welds. 50% of the total number of dissimilar metal welds associated with the containment system were to receive a surface examination. What is the extent of dissimilar metal welds in the Comanche Peak containment structures? How does a general visual examination provide the same acceptable level of quality and safety as a surface examination?
10. Examination Category E-G, Pressure Retaining Bolting, has been removed from Table IWE-2500-1. The 1992 Edition required VT-1 visual of bolting when a connection was disassembled. The 1998 Edition requires a general visual, performed in place, with no requirement when the joint is disassembled. The licensee should provide an argument for why not performing a VT-1 visual examination of the bolting, when disassembled, provides an acceptable (equivalent) level of quality and safety.