



**INDUSTRY PERSPECTIVE OF PERFORMANCE  
MONITORING**

**INDUSTRY/NRC MATERIALS TECHNICAL EXCHANGE  
MEETING**

5/26/2022 • Rockville, MD

# Industry Perspective

- Constellation Proposed Alternatives:
  - ✓ “Proposed Alternative for Examination of Pressurizer Circumferential and Longitudinal Shell-to-Head Welds and Nozzle-to-Vessel Welds,” dated May 12, 2021 (ML21133A297)
  - ✓ “Proposed Alternative for Examinations of Examination Category C-B Steam Generator Nozzle-to-Shell Welds and Nozzle Inside Radius Sections,” dated September 1, 2021 (ML21244A328)
- NRC previously approved pilots without condition and changed approval basis for follow-on applications
- Inability to create a stable regulatory process leads to a substantial burden to the industry
- NRC provided no technical basis for their position, other than possible unknown future degradation mechanisms
- The licensee had no clear direction OR criteria to address RAIs given divergence from pilot plant submittal precedence
- It appears that NRC will no longer accept analytical arguments for extending weld examinations without performance monitoring even though the analytical work demonstrated adequate margins to account for future uncertainties