

NRC INSPECTION MANUAL

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INSPECTION PROCEDURE 73755

INSERVICE INSPECTION DATA REVIEW AND EVALUATION

PROGRAM APPLICABILITY: 2515 (BASIC)

73755-01 INSPECTION OBJECTIVES

01.01 Ascertain whether the reported data covers the scope of examination required during the current inspection period of the inspection interval as described in the applicable ASME Code, the Technical Specifications (TS), and Inservice Inspection (ISI) program accepted by the NRC.

01.02 Ascertain whether the ISI data files are complete and the data are within the previously established acceptance criteria.

01.03 Ascertain whether the licensee's disposition of adverse findings and subsequent re-examination is consistent with regulatory requirements.

01.04 Ascertain whether the licensee is utilizing the services of a third party inspection agency, as required.

73755-02 INSPECTION REQUIREMENTS

02.01 Review site nondestructive examination (NDE) inspection records for the current inspection period of the inspection interval and ascertain whether the reported extent and frequency of examinations for those Class 1, 2, and 3 components and areas subject to examination are consistent with the TS and ISI program accepted by the NRC, meet the minimum examination requirements specified in the applicable addenda of the ASME Code Section XI, and have been reviewed by the Authorized Nuclear Inservice Inspector (ANII).

02.02 Obtain NDE records of the most recent ISI examinations of one of each of the following:

- a. One pressure retaining pipe weld in each of three piping systems (above 2 in./diam.), of which at least two systems should be within the reactor coolant pressure boundary.
- b. One pressure test with visual examination.

c. Visual examination of one bolted connection.

Ascertain whether the selected records contain or provide reference to the following documents:

- a. Examination results and data sheets.
- b. Examination equipment data.
- c. Calibration data sheets.
- d. Examination evaluation data.
- e. Records on extent of examination.
- f. Records on deviation from program and procedures including justification for deviation, if applicable.
- g. Records on disposition of findings.
- h. Re-examination data after repairwork, if applicable.
- i. Identification of NDE material such as penetrant, penetrant cleaner, couplant, films, tapes, etc.

02.03 Obtain NDE records for the most recent ISI examination of one pressure retaining weld of the reactor pressure vessel (length of examination not less than five feet) or one nozzle examination. If such records are unavailable due to these examinations being performed at the full ten-year interval, expand the sample of NDE records examined in paragraph 02.02 to include two more pressure retaining piping welds or two pressure retaining component welds. Ascertain that the following requirements are met:

- a. The method, extent, and technique of examination comply with the licensee's ISI program and applicable NDE procedure.
- b. The examination data are within the acceptance criteria as outlined in the applicable NDE procedure and applicable Code requirements.
- c. The recording, evaluating, and dispositioning of findings are in compliance with the applicable NDE procedure and applicable Code requirements.
- d. Inservice NDE results are compared with the recorded results of prior Section XI examinations.
- e. The method used for NDE was sufficient to determine the full extent of indication or acceptance.

02.04 Obtain the records for the two most recent Code repair and replacement activities. Verify that the following requirements are met:

- a. The method, extent, and technique of examination comply with the licensee's Code repair/replacement procedures.

- b. The examination data are within the acceptance criteria as outlined in the applicable Code repair/replacement procedures and applicable Code requirements.
- c. The recording, evaluating, and dispositioning of findings are in compliance with the applicable Code repair/replacement procedures and applicable Code requirements.
- d. The method used for NDE was sufficient to determine the full extent of indication or acceptance.

73755-03 INSPECTION GUIDANCE

General Guidance. This procedure should be run for the first ISI of each unit. Subsequent reviews shall be conducted twice within a three-outage cycle. One of these inspections shall be an in-office review of the Owner's ISI Report, while the other shall be an onsite data review. The inspection frequency at the site should be increased if the licensee receives a Category 3 SALP rating in the "outage" functional area. In-office review of the Owner's ISI Report should be charged to this inspection procedure on NRC form 766, rather than to inspection procedure 90713. MC 2515 applicability requirements for inspection items delineated in section 73755-02 are 100% for each additional unit at duplicate facility sites and at other multifacility sites.

The ISIs of interest in this procedure are those nondestructive examinations of Class 1, 2, and 3 components and system leakage and hydrostatic tests performed to meet the requirements of the TS and the ISI program accepted by the NRC. Inservice testing of pumps and valves as described in ASME Code Section XI is not included within the scope of this procedure.

Examination data, test results, and other NDE data and records are essential for comparison with future examinations to establish a history of findings and indications. Evaluation of the previous growth rate of flaws and other indications permits a realistic prediction of expected further growth based on valid examination data. Therefore, it is essential to have complete, reliable, and clear NDE data, records, and files for each examination.

It is the intent of this inspection procedure to review examination findings to assure that corrective measures are taken on adverse findings, and to ensure that the licensee has used the services of the Authorized Nuclear Inspector (ANI) and ANII, as required. If the situation arises wherein the authorized inspector appears to have neglected to perform his assigned activities, the matter should be referred to IE Headquarters.

Additionally, since Section XI requires that the Owner's ISI Report be filed with the NRC (in practice, the Regional Office), completion of this review by the inspector at the frequency stated above will ensure systematic and programmatic handling of these reports and documentation of the inspector's review.

03.01 Specific Guidance.

- a. Inspection Requirement 02.01. Pursuant to 10 CFR 50.55a(g), the licensee periodically submits an updated ISI program to the NRC for review and approval. Requirements delineated in this program are regulatory requirements as are the TS. In the event of conflict between the TS and 10 CFR 50.55a(g), the regulatory position is that of the more stringent requirement. As required by Section XI, the licensee prepares records of inservice inspections. With the advent of inspection of Class 2 components and Class 3 systems, inservice inspections may occur at different times during the calendar year. Therefore, to determine the licensee's compliance with the extent and frequency of required examinations and pressure tests, the inspector performs a review of the collective records for the current inspection period. Exceptions to or exemptions from testing requirements shall be consistent with those permitted by the ISI program approved by the NRC.
- b. Inspection Requirement 02.02. The inspector should use the listing of required documents as a "checklist" during the review of the three selected sets of NDE records for completeness and technical adequacy. In addition, the inspector should ensure that the following requirements were met for the test records reviewed:
1. The examination unit calibration data sheets show no major deviations between initial and final calibrations.
 2. Collected examination data and any recordable indications are properly recorded to permit accurate evaluation and documentation.
 3. Evaluation of examination data is performed by a Level II or Level III examiner.
 4. Evaluation of examination complies with the procedure.
 5. Evaluation of indicators complies with the criteria of the NDE procedure and ASME Code Section XI, if applicable.
 6. Incomplete examinations and results were repeated to permit full evaluation, if applicable.
- c. Inspection Requirement 02.03. The NRC inspector shall evaluate the data and references of these selected sets of inspection records and verify that the licensee's inspection program and procedures have been followed for the requirements listed in 73755-02 of this procedure. For the review of evaluations of examinations, the inspector should ascertain whether the inspection procedure criteria have been followed and whether the limitations for acceptability exceed the limits set forth in ASME Code Section XI and the TS.

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