

June 15, 2001

MEMORANDUM TO: David Terao, Chief
Component and Containment Reliability Section
Mechanical and Civil Engineering Branch
Division of Engineering

FROM: Margie Kotzalas */RA/*
Component and Containment Reliability Section
Mechanical and Civil Engineering Branch
Division of Engineering

SUBJECT: TRIP REPORT: ASME SECTION XI, WORKING GROUP ON
CONTAINMENTS (IWE/IWL), MAY 15, 2001

A meeting of the ASME *Boiler and Pressure Vessel Code*, Section XI, Working Group on Containments (WG/C) was held on May 15, 2001, at the Omni William Penn in Pittsburgh, Pennsylvania.

At the meeting, the following proposed code changes were passed by the working group:

1. WG/C-L #98-01, SGWCS #00-05, ISI #00-07, "Concrete Containment Repair/Replacement Activities"

The Working Group approved changes to IWL-4100, IWL-4110, IWL4220(a), IWL-4240(a), IWL-5210, and Table IWA-1600-1, and the addition of IWL-4180 to address requirements for repair/replacement activities for concrete containments. This action will help clarify requirements by (1) specifying which requirements of IWA-4000 apply; (2) specifying which types of activities are exempt from the requirements of IWL-4000; (3) specifying additional requirements for concrete repair documentation; and (4) specifying that welding of the post-tensioning system shall be limited to bearing plates.

The proposed change passed WG/C and Subgroup Water Cooled. I abstained from voting on this action because I felt that the wording in the proposed change to IWL-5210(b) was ambiguous. The proposed changes to IWL-5210(b) is described below:

IWL-5210

A containment pressure test shall be performed following repair/replacement activities, unless:

:

- (b) the Engineering Evaluation Report (IWL-3310) demonstrates that the containment satisfies the original design criteria prior to and during the performance of the repair/replacement activity.

My concern is that subparagraph (b) can be interpreted as not requiring a pressure test after repair/replacement activities if the design criteria are satisfied for the condition during which the licensee performs the repair/replacement activity (i.e., shutdown). From discussion of the working group members, it is clear that the intent of this code requirement is to not require a pressure test if the design criteria for *operating conditions* are satisfied. The design criteria for shutdown is less stringent than it is for operating conditions.

2. WG/C 01-01, BC-00-17, WGGR: 97-08, ISI: 98-3, IWA-1320, "Classifications"

A new business item was presented to the Working Group. This item proposed a change to the classifications of IWA-1320. The following change is proposed:

IWA-1320(d) ~~The portion of piping that penetrates a containment vessel, which is required by Section III to be constructed to Class 1 or 2 rules for piping and which may differ from the classification of the balance of the piping system, need not affect the overall system classification that determines the applicable rules of this Division.~~ **The portion of piping that penetrates a containment vessel shall be examined in accordance with the classification specified by the Design Specification for that portion of piping, which may differ from the classification of the balance of the piping system. This classification need not affect the overall system classification that determines the applicable rules of this Division.**

Neither I nor Herman Graves, the other NRC WG/C member, voted on this item because of objections to the change. The wording of this change would allow piping passing through containment to be classified as MC components. The ISI requirements for class MC components is visual examination. Visual examination alone may not be sufficient for assuring leak tight integrity of the piping.

This item passed the Working Group and was voted negatively by Wally Norris, the NRC member of the SGWC. However, the item passed SGWC and will be on the agenda of Subcommittee for August.

At the next meeting of the WG/C in August, action will be taken on a new business item. The action to be proposed will require examination of inaccessible Class MC and CC component areas when evidence of degradation exists in accessible Class MC and CC component areas. This item results from studies of aging management, the GALL, and the NRC staff's SRP on license renewal. This is also an issue addressed in the regulations in 10 CFR 50.55a(b)(2)(viii)(E) and 10 CFR 50.55a(b)(2)(ix)(A).

cc: Gene Imbro
Hans Ashar
Wally Norris
Herman Graves

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ADAMS ACCESSION NUMBER:

OFFICE	NRR/DE/EMEB	NRR/DE/EMEB
NAME	M. Kotzalas	DTerao
DATE	6 /15/2001	6 /15 /2001

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