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Subject: BMI RELIEF REQUESR RR-ENG-35
Creation Date: 6/25/03 4:44PM
From: Mohan Thadani

Created By: MCT@nrc.gov

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Date: 6/30/03 9:34AM
Subject: Response to RAI on RR-ENG-2-35

The attached is our response to an NRC request for additional information regarding the STPNOC relief request on taking boat samples as part of the BMI effort.

From: Mohan Thadani
To: INTERNET:awharrison@stpegs.com
Date: 6/25/03 4:44PM
Subject: BMI RELIEF REQUEST RR-ENG-35

Wayne:

Listed below are questions that the NRC staff would like to have answered, in order to complete the review of STPNOC's request. A prompt response to these questions will expedite the NRC staff's completion of the review.

Thanks.

Mohan

RAI for STP, EDM UNDERWATER, (RR-ENG-2-35)

1. ASME Section XI has recognized that underwater welding is a specialized process that requires specialized testing and essential variables. EDM is a thermal metal removal process that leaves a heat affected zone similar to a weld heat affected zone. Since the EDM that is proposed by this relief request is being performed underwater, are the thermal metal removal process qualification tests going to be performed underwater to accurately simulate the production conditions on the test specimens?
2. IWA-4461.4(c) and IWA-4461.4(e) require the licensee to establish acceptance criteria for surface roughness and corrosion testing of the specimens, provide these acceptance criteria.
3. If the qualification testing of IWA-4461.4 reveal that any micro-fissures or oxide layer will be left after the EDM, what type of analysis will be performed to demonstrate that these will not propagate over the life of the RPV?
4. Will any NDE be done on the final cut surface?
5. Will any Examination be done on this item on an ongoing basis? (Every outage or every other outage, etc.)
6. How will the licensee comply with IWA-4422.2.1? (NDE after "Defect Removal Without Welding or Brazing.")
7. What materials are the items to be thermally cut made of? (ASME SA Number, type, and grade; heat treatment condition). Will the EDM cut include the penetration tube; the original weld butter; the final J-groove weld; the RPV alloy steel material; the stainless steel cladding?
8. What effect will the elimination of mechanical metal removal processes have on the susceptibility of Alloy 600 materials and their associated welds to PWSCC?
9. For what period of time does the licensee request this relief?

CC: Robert Gramm