

October 28, 2005

Mr. Paul A. Harden  
Site Vice President  
Nuclear Management Company, LLC  
Palisades Nuclear Plant  
27780 Blue Star Memorial Highway  
Covert, MI 49043-9530

SUBJECT: PALISADES PLANT — REQUEST FOR ADDITIONAL INFORMATION  
RELATED TO REQUEST FOR RELIEF FROM ASME SECTION XI CODE  
REQUIREMENTS FOR REPAIR OF PRESSURIZER NOZZLE PENETRATIONS  
- USE OF CODE CASE N-638 WITH THREE EXCEPTIONS (TAC NO. MC7993)

Dear Mr. Harden:

Your letter of July 22, 2005, requested relief from certain requirements of the 1989 Edition of the American Society of Mechanical Engineers' *Boiler and Pressure Vessel Code*, Section XI, related to repair of pressurizer nozzle penetrations. The specific relief requested is to use Code Case N-638, "Similar and Dissimilar Metal Welding Using Ambient Temperature Machine [Gas Tungsten Arc Welding] GTAW Temper Bead Technique" with three exceptions.

We are reviewing your request, and find that we need additional information as shown in the enclosed request for additional information (RAI). I discussed this RAI with Ms. Amy Hazelhoff of your organization on October 26, 2005, and she agreed to respond by November 30, 2005. Please contact me at (301) 415-1423 if you have questions.

Sincerely,

**/RAI**

L. Mark Padovan, Project Manager, Section 1  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosure: RAI

cc w/encl: See next page

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DATE	10/28/05	10/27/05	10/28/05

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Palisades Plant

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27780 Blue Star Memorial Highway  
Covert, MI 49043

Request for Additional Information

Related to Request for Relief from ASME Section XI Code Requirements for Repair of  
Pressurizer Nozzle Penetrations - Use of Code Case N-638 with Three Exceptions

Palisades Nuclear Plant

Docket No. 50-255

1. Item 6, "Duration of Proposed Alternative," on page 4 of Enclosure 1 to Nuclear Management Company's (NMC's) letter of July 22, 2005, says "NMC requests approval of the proposed alternative for the remainder of the third ten-year interval of the Inservice Inspection Program for the Palisades Nuclear Plant, which will conclude on or before December 12, 2006." Please state the outage date, and the specific conditions for using this relief request (such as is shown in Attachment 1 to the relief request). All other requests for relief shall be made on a case-by-case basis.
2. On page 4 of its relief request, NMC took exception to the ultrasonic testing acceptance criteria shown in Code Case N-638, "Similar and Dissimilar Metal Welding Using Ambient Temperature Machine [Gas Tungsten Arc Welding] GTAW Temper Bead Technique." NMC proposed using the acceptance standard for ultrasonic testing shown in NB-5244(a) of the 1992 Edition of the American Society of Mechanical Engineers' *Boiler and Pressure Vessel Code*, Section III. Code Case N-638-1 has been conditionally accepted by the Nuclear Regulatory Commission (NRC) in Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1," Revision 14, dated August, 2005. The condition NRC has placed on this Code Case is that "UT examinations shall be demonstrated for the repaired volume using representative samples which contain construction type flaws. The acceptance criteria of NB-5330 of Section III edition and addenda approved in 10 CFR 50.55a apply to all flaws identified within the repaired volume." The staff expects NMC to comply with the acceptance criteria shown in the regulatory guide for Code Case N-638-1. Please modify your submittal to indicate that you will use the acceptance criteria shown in Regulatory Guide 1.147 for Code Case N-638-1.

ENCLOSURE