

The NRC staff had concerns regarding the same alternative under a recently proposed Code Case (N-740) because the alternative was not adequately supported. The subject proposed Code Case was then revised to the original 48 hour **[The licensee agreed to amend the application to eliminate this 48-hour provision.]** ambient post-NDE requirement as

defined under N-638-1. The NRC staff has not formally reviewed the EPRI document you mentioned in your basis nor has it been submitted to the NRC staff for formal review. You may submit the referenced document for the NRC staff's information. However, this does not guarantee that your alternative will be approved to support your outage schedule. Currently, the NRC staff is reviewing "Technical Basis for Preemptive Weld Overlays for Alloy 82/182 Butt Welds in PWRs" (MRP-169), to assess the use of PWOLs on a generic basis. It has not been determined if the NRC staff's review of this document will support your outage schedule at this time.

Based on the discussion above, the NRC staff finds that your basis does not sufficiently support your position that the alternative to performing NDE 48 hours after completion of the PWOL welding provides an acceptable level of quality and safety pursuant to 10 CFR 50.55a(a)(3)(i).

(3) On page 9 of the attachment you stated that it was not possible to perform the full UT of the 1.5T band. Your basis was that "it is not possible to perform a meaningful UT of the required band of base material because of the existing nozzle configuration in Figure 1." Please provide additional information to support your conclusion. The information provided should discuss the achievable amount of area that will be successfully examined for each design configuration you wish to perform a PWOL on. Secondly, clarify whether the UT examination will be performed on the maximum extent achievable.

**This e-mail aims solely to prepare you and others for the requested conference call. It does not formally request for information, nor does it convey a formal NRC staff position.**

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**Subject:** Cook 2: Record of conference call re. preemptive weld overlay **(TAC MC9305)**

**Creation Date:** 2/15/06 4:31PM

**From:** Peter Tam

**Created By:** PST@nrc.gov

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