

**From:** Peter Tam  
**To:** sdsimpson@aep.com  
**Date:** 08/23/2006 5:26:20 PM  
**Subject:** D.C. Cook: Draft RAI on Preemptive Weld Overlay (**TAC MD2119**)

Sue:

Following are draft questions that we would like to discuss with you in the proposed conference call, tentatively scheduled for Friday (8/25/06):

1. Table 2 of Regulatory Guide 1.147, Rev. 14, identifies the Code Cases that are conditionally acceptable, i.e., for use by licensees within the limitations and conditions identified in the table. Those conditions are identified by the staff during its review of the Code Cases and are necessary to ensure an acceptable level of quality and safety. Therefore, licensees must include those conditions in their Relief Requests.

No provisions are made in Regulatory Guide 1.147 for allowing licensees to delete or alter those conditions.

D.C. Cook's June 9, 2006 letter requests relief from the Code Case N-638-1 condition in Table 2 of Regulatory Guide 1.147. Specifically, the letter states in part that, "The proposed alternative is similar to the one previously submitted for CNP Unit 2 (referenced letter) and verbally approved by the Nuclear Regulatory Commission (NRC). The D.C. Cook (CNP) Unit 1 proposed alternative differs from the CNP Unit 2 proposed alternative in that it does not contain a requirement to perform a best effort ultrasonic examination of the 1.5T band, and includes the use of the acceptance criteria of Code Case N-504-2 rather than the ASME Code, Section III, NB-5330 acceptance criteria required by Regulatory Guide 1.147." Therefore, in accordance with the reasoning stated in the previous paragraph, this Relief Request must be supplemented to recognize the Licensee's compliance with the condition for N-638-1 to provide an acceptable level of quality and safety. The condition stated in the Regulatory Guide must be included in the relief request.

2. D.C. Cook's June 9, 2006 letter states in part, "The CNP Unit 1 stress and flaw growth analyses required by Code Case N-504-2 (summaries were submitted for CNP Unit 2 at the NRC's request) have not yet been completed. The summaries will be available for NRC review when completed." Clarify that the stress analysis summaries for the preemptive weld overlays will be completed prior to restart of the unit (see page 1 of attachment 1 to the March 1, 2006 letter from D.C. Cook Unit 2 for the relief request for D.C. Cook Unit 2.) Alternatively, provide a justification for completing the stress analysis after start-up.

3. On pages 8 and 9 of the attachment to your submittal, you state that it is not practical to perform the full UT of the 1.5T band. Your basis is that the existing nozzle configuration in Figure 1 prevents you from completing the full UT. 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 pre-emptive weld overlay design configuration. Secondly, the UT examination should be performed on the maximum extent achievable.

This e-mail aims solely to prepare you and others for the proposed conference call. **This e-mail does not formally request for additional information, and it does not convey a formal NRC staff position.**

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