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CALVERT CLIFFS  
NUCLEAR POWER PLANT

February 9, 2012

U. S. Nuclear Regulatory Commission  
Washington, DC 20555

**ATTENTION:** Document Control Desk

**SUBJECT:** Calvert Cliffs Nuclear Power Plant  
Unit No. 1; Docket No. 50-317  
Relief Request for Unit 1 Dissimilar Metal Butt Welds Baseline Examinations  
(RR-ISI-04-06A)

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**REFERENCE:** (a) Letter from J. J. Stanley (CCNPP) to Document Control Desk (NRC),  
dated December 29, 2011, Relief Requests for Dissimilar Metal Butt  
Welds Baseline Inspections (RR-ISI-04-06 & ISI-04-07)

In Reference (a), Calvert Cliffs Nuclear Power Plant, LLC (Calvert Cliffs) requested Nuclear Regulatory Commission approval for use of an alternative to the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Code Case N-770-1 as conditioned in 10 CFR 50.55a, dated June 21, 2011. As discussed in a telephone conference call with the Nuclear Regulatory Commission on January 18, 2012, Calvert Cliffs agreed to submit a revised relief request encompassing aspects discussed during the conference call. The revised relief request for Calvert Cliffs Unit 1 (RR-ISI-04-06A) is provided in Attachment (1) and is submitted pursuant to 10 CFR 50.55a(a)(3)(ii) as compliance with all requirements of American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Code Case N-770-1 would pose a hardship without a compensating increase in the level of quality and safety.

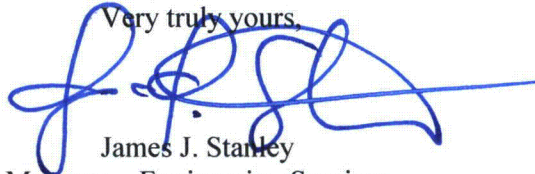
To support Calvert Cliffs expected startup date following its 2012 Unit 1 refueling outage (the first outage after January 20, 2012), Calvert Cliffs requests approval by March 26, 2012. This relief request is effective for Calvert Cliffs Fourth Ten-Year Inservice Inspection Interval. A separate relief request for Calvert Cliffs Unit 2 dissimilar metal weld examinations will be submitted at a later date.

A047  
NRC

Document Control Desk  
February 9, 2012  
Page 2

Should you have questions regarding this matter, please contact Mr. Douglas E. Lauver at (410) 495-5219.

Very truly yours,



James J. Stanley  
Manager – Engineering Services

JJS/KLG/bjd

Attachment: (1) Revised Relief Request for Calvert Cliffs Unit 1 Dissimilar Metal Butt Weld Examinations (RR-ISI-04-06A)  
Enclosure: 1 Unit 1 Examination Coverage Plots

Document Control Desk  
February 9, 2012  
Page 3

cc: D. V. Pickett, NRC  
W. M. Dean, NRC

Resident Inspector, NRC  
S. Gray, DNR

**ATTACHMENT (1)**

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**REVISED RELIEF REQUEST FOR CALVERT CLIFFS UNIT 1  
DISSIMILAR METAL BUTT WELD EXAMINATIONS (RR-ISI-04-06A)**

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## ATTACHMENT (1)

### RELIEF REQUEST FOR CALVERT CLIFFS UNIT 1 DISSIMILAR METAL BUTT WELD EXAMINATIONS (RR-ISI-04-06A)

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#### 1. ASME Code Component(s) Affected

Code Class 1 PWR Pressure Retaining Dissimilar Metal Piping and Vessel Nozzle Butt Welds Containing Alloy 82/182. American Society of Mechanical Engineers (ASME) Code Case N-770-1, Table 1, Examinations Categories.

Inspection Item B - Unmitigated Butt Welds at Cold Leg Operating Temperature

Inspection Item D – Uncracked Butt Welds Mitigated with Stress Improvement

Inspection Item E – Cracked Butt Welds Mitigated with Stress Improvement

#### 2. Applicable Code Edition and Addenda

ASME Boiler and Pressure Vessel Code, Section XI, 2004 Edition, no Addenda - Code Case N-770-1 subject to conditions specified in 10 CFR 50.55a(g)(6)(ii)(F)(2 through 10).

#### 3. Applicable Code Requirement

With the issuance of a revised 10 CFR 50.55a in June 2011, the Nuclear Regulatory Commission (NRC) incorporated by reference ASME Code Case N-770-1, "Alternative Examination Requirements and Acceptance Standards for Class 1 PWR Piping and Vessel Nozzle Butt Welds Fabricated with UNS N06082 or UNS W86182 Weld Filler Material With or Without Application of Listed Mitigation Activities, Section XI, Division 1" (ASME Approval Date: December 25, 2009). Specific implementing requirements are documented in 10 CFR 50.55a(g)(6)(ii)(F) and are listed below.

- (1) Licensees of existing, operating pressurized-water reactors as of July 21, 2011 shall implement the requirements of ASME Code Case N-770-1, subject to the conditions specified in paragraphs (g)(6)(ii)(F)(2) through (g)(6)(ii)(F)(10) of this section, by the first refueling outage after August 22, 2011.
- (2) Full structural weld overlays authorized by the NRC staff may be categorized as Inspection Items C or F, as appropriate; welds that have been mitigated by the Mechanical Stress Improvement Process (MSIP™) may be categorized as Inspection Items D or E, as appropriate, provided the criteria in Appendix I of the code case have been met; for inservice inspection (ISI) frequencies, all other butt welds that rely on Alloy 82/182 for structural integrity shall be categorized as Inspection Items A-1, A-2, or B until the NRC staff has reviewed the mitigation and authorized an alternative code case Inspection Item for the mitigated weld, or until an alternative code case Inspection Item is used based on conformance with an ASME mitigation code case endorsed in Regulatory Guide 1.147 with conditions, if applicable, and incorporated in this section.
- (3) Baseline examinations for welds in Table 1, Inspection Items A-1, A-2, and B, shall be completed by the end of the next refueling outage after January 20, 2012. Previous examinations of these welds can be credited for baseline examinations if they were performed within the re-inspection period for the weld item in ASME Code Case N-770-1, Table 1 using Section XI, Appendix VIII requirements and met the Code required examination volume of essentially 100 percent. Other previous examinations that do not meet these requirements can be used to meet the baseline examination requirement, provided NRC approval of alternative inspection requirements in accordance with paragraphs (a)(3)(i) or (a)(3)(ii) of this section is granted prior to the end of the next refueling outage after January 20, 2012.

## ATTACHMENT (1)

### RELIEF REQUEST FOR CALVERT CLIFFS UNIT 1 DISSIMILAR METAL BUTT WELD EXAMINATIONS (RR-ISI-04-06A)

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- (4) The axial examination coverage requirements of -2500(c) may not be considered to be satisfied unless essentially 100 percent coverage is achieved.

Items (5) through (9) of 10 CFR 50.55a(g)(6)(ii)(F) address future inspections beyond the baseline examination and are therefore not discussed in this relief request. Item (10) of 10 CFR 50.55a(g)(6)(ii)(F) addresses a mitigation that Calvert Cliffs does not have and is therefore not discussed in this relief request.

#### 4. Reason for the Request

The relevant conditions for this relief request are ASME Code Case N-770-1, -2500 (b) and its Mandatory Appendix I criteria as it pertains to dissimilar metal (DM) welds with cast stainless steel safe ends, and as subject to items (2) through (4) of 10 CFR 50.55a(g)(6)(ii)(F). Item (2) addresses defining the appropriate Inspection Item. Item (3) addresses performing the required baseline examination for that Inspection Item, while item (4) addresses the required examination coverage.

Item (2) of 10 CFR 50.55a(g)(ii)(F) requires that welds that have been mitigated by the MSIP™ may be categorized as Inspection Items D or E, as appropriate, provided the criteria in Appendix I of the code case have been met. Dissimilar metal welds mitigated by the MSIP™ which have cast stainless steel safe ends may not meet the intent of performance criteria of I-5.1 since ASME Code Section XI, Appendix VIII rules for cast stainless are in the course of preparation. For welds mitigated by the MSIP™, documentation that the criteria in Appendix I of the code case have been met must be performed. The criteria in ASME Code Case N-770-1, Appendix I, with the exception of the cast stainless steel ASME Code Section XI Appendix VIII procedures have been met.

Item (3) of 10 CFR 50.55a(g)(6)(ii)(F) requires that all Inspection Items A-1, A-2, and B receive a baseline examination by the end of the first refueling outage after January 20, 2012. The Class 1 pressure retaining DM welds  $\geq 2$  nominal pipe size (NPS) were examined during the 2010 refueling outage to the full extent practicable. Specifics on the examination procedure and examination coverage is described below and credit for these exams as baseline examinations is sought where full ASME Code Case N-770-1 examination cannot be achieved.

Whereas MRP-139 (Reference 1) and ASME Code Case N-770-1 made allowances for limitations in circumferential scanning for axial flaw examination coverage of DM welds, the NRC has stated in item (4) that essentially 100 percent coverage is required. This applies to meeting the baseline requirements for Item (3) above.

#### 5. Component/Weld Scope

The welds shown in Table A below are the applicable welds  $\geq 2$  NPS covered by the requirements contained in ASME Code Case N-770-1, Section -1000. These welds have been categorized in accordance with Table 1 from ASME Code Case N-770-1. The examination volume coverage achieved during the 2010 refueling outage is also included in the table in three columns, representing different coverage determination criteria.

Examination coverage plots are included in Enclosure 1 for those welds where essentially 100 percent coverage was unable to be obtained using either ASME Code Case N-770-1 coverage determination, or for which 100 percent coverage was not achieved for the susceptible material examination volume.

**ATTACHMENT (1)**

**RELIEF REQUEST FOR CALVERT CLIFFS UNIT 1 DISSIMILAR METAL BUTT WELD EXAMINATIONS (RR-ISI-04-06A)**

**TABLE A - UNIT 1 DM WELD POPULATION**

DM Weld Designator / ID	Location	NPS	Inspection Item Category		N-770-1 Based Coverage <sup>(1)(2)</sup>			N-770-1 Coverage including CASS <sup>(1)(3)</sup>			Susceptible Material Coverage <sup>(4)</sup>		
			MRP-139	N-770-1	Axial Scan (%)	Circ Scan (%)	Total (%)	Axial Scan (%)	Circ Scan (%)	Total (%)	Axial Scan (%)	Circ Scan (%)	Total (%)
102300 / 30-RC-11A-7	11A RCP Inlet	30"	E	B	71	57	64	100	71	86	100	63	82
102450 / 30-RC-11A-10	11A RCP Outlet	30"	E	B	77	61	69	100	84	92	100	91	96
104550 / 30-RC-11B-7	11B RCP Inlet	30"	E	B	73	60	67	100	76	88	100	74	87
104700 / 30-RC-11B-10	11B RCP Outlet	30"	E	B	63	63	63	100	100	100	100	100	100
107450 / 30-RC-12A-7	12A RCP Inlet	30"	E	B	80	66	73	100	66	83	100	71	85
107600 / 30-RC-12A-10	12A RCP Outlet	30"	E	B	71	67	69	99	94	97	98	88	93
109600 / 30-RC-12B-7	12B RCP Inlet	30"	E	B	72	58	65	100	70	85	100	64	82
109750 / 30-RC-12B-10	12B RCP Outlet	30"	E	B	80	80	80	100	100	100	100	100	100
110450 / 12-PSL-1	PZR Surge @ PZR	12"	C	D	68	44	56	100	77	88	100	50	75
111100 / 12-PSL-13	PZR Surge @ RCS Hot Leg	12"	G	E	64	63	64	100	66	83	100	98	99
113150 / 12-SC-1004-1	Shutdown Cooling to RCS Hot Leg	12"	C	D	72	72	72	100	100	100	100	100	100
114350 / 12-SI-1009-16	Safety Injection to 11A Cold Leg	12"	E	B	73	69	71	100	69	85	100	92	96
115200 / 12-SI-1010-14	Safety Injection to 11B Cold Leg	12"	E	B	73	53	63	100	82	91	100	65	83

## ATTACHMENT (1)

## RELIEF REQUEST FOR CALVERT CLIFFS UNIT 1 DISSIMILAR METAL BUTT WELD EXAMINATIONS (RR-ISI-04-06A)

TABLE A - UNIT 1 DM WELD POPULATION

DM Weld Designator / ID	Location	NPS	Inspection Item Category		N-770-1 Based Coverage <sup>(1)(2)</sup>			N-770-1 Coverage including CASS <sup>(1)(3)</sup>			Susceptible Material Coverage <sup>(4)</sup>		
			MRP-139	N-770-1	Axial Scan (%)	Circ Scan (%)	Total (%)	Axial Scan (%)	Circ Scan (%)	Total (%)	Axial Scan (%)	Circ Scan (%)	Total (%)
116000 / 12-SI-1011-13	Safety Injection to 12A Cold Leg	12"	E	B	67	48	58	100	81	91	100	60	80
116750 / 12-SI-1012-13	Safety Injection to 12B Cold Leg	12"	E	B	67	30	48	100	63	81	100	34	67
118500 / 4-PS-1003-6	PZR Spray	4"	C	D	100	70	85	N/A	N/A	N/A	100	99	100
118550 / 3-PS-1001-1	PZR Spray from 11A Cold Leg	3"	E	B	100	100	100	N/A	N/A	N/A	100	100	100
120350 / 3-PS-1002-1	PZR Spray from 11B Cold Leg	3"	E	B	100	100	100	N/A	N/A	N/A	100	100	100
123100 / 4-SR-1005-1	PZR Safety/Relief	4"	C	D	100	100	100	N/A	N/A	N/A	100	100	100
123450 / 4-SR-1006-1	PZR Safety/Relief	4"	G	E	100	100	100	N/A	N/A	N/A	100	100	100
125050 / 2-LD-1004-1	12A Cold Leg Letdown	2"	E	B	100	100	100	N/A	N/A	N/A	100	100	100
128900 / 2-CV-1004-19	12B Charging Inlet	2"	E	B	100	100	100	N/A	N/A	N/A	100	100	100
130450 / 2-CV-1005-29	11A Charging Inlet	2"	E	B	100	100	100	N/A	N/A	N/A	100	100	100
131200 / 2-DR-1003-1	11A Cold Leg Drain	2"	E	B	100	100	100	N/A	N/A	N/A	100	100	100
131500 / 2-DR-1004-1	11B Cold Leg Drain	2"	E	B	100	100	100	N/A	N/A	N/A	100	100	100
132150 / 2-DR-1006-1	12B Cold Leg Drain	2"	E	B	100	100	100	N/A	N/A	N/A	100	100	100
132450 / 2-DR-1007-1	RCS 11 Hot Leg Drain	2"	G	E	100	100	100	N/A	N/A	N/A	100	100	100

## ATTACHMENT (1)

### RELIEF REQUEST FOR CALVERT CLIFFS UNIT 1 DISSIMILAR METAL BUTT WELD EXAMINATIONS (RR-ISI-04-06A)

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#### Notes:

- (1) The examination volume is based on Figure 1 from ASME Code Case N-770-1.
- (2) Coverage has been calculated based on the limitations contained in the Section XI, Appendix VIII-qualified examination procedure, SI-UT-130 R3, which is not qualified for examinations performed from the cast austenitic stainless steel (CASS) material side of the component.
- (3) Calculated coverage values include the CASS material that was interrogated by the examination technique.
- (4) Examination coverage of the susceptible material located in the lower 1/3 thickness region of the base material has been estimated based on original design drawings.

#### 6. Burden Caused by Compliance

In accordance with 10 CFR 50.55a(a)(3)(ii), relief is requested for the components listed in Table A above on the basis that the required examination coverage of “essentially 100 percent” or “100 percent of the susceptible material volume” for cast stainless steel items is unattainable due to physical obstructions and the limitations imposed by design, geometry, and materials of construction. Calvert Cliffs used examination techniques qualified to meet the requirements of ASME Section XI, Appendix VIII, as required in 10 CFR 50.55a(g)(6), that achieved the maximum practical amount of coverage obtainable within the limitations imposed by the design, geometry and materials of construction for the components and examination techniques listed.

Based on the design configuration of the components and available examinations techniques, Calvert Cliffs was not able to achieve 100 percent coverage of the susceptible material examination volume and/or essentially 100 percent code coverage of the required examination volume for 16 of the welds listed without major modifications to the components. Plots of the ultrasonic testing (UT) coverage of the examination volume of those 16 affected welds are provided. Although essentially 100 percent code coverage was not obtained, every effort was made to obtain the maximum practical coverage. Note that Table A lists all 27 Class 1 DM welds  $\geq 2$  NPS in the Reactor Coolant System and the coverage achieved in the 2010 refueling outage. The combination of coverage amount combined with the examination techniques discussed below, contributed to maintaining a high level of quality and safety.

#### 7. Proposed Alternative and Basis for Use

Dissimilar metal weld examinations performed at Calvert Cliffs during the 2010 refueling outage employed phased array (PA) UT technology. Utilizing PA UT technology not only improves the overall effectiveness of the UT examination but also provides significant performance improvements when compared to conventional examination methodologies.

All DM welds were examined utilizing Structural Integrity’s proprietary manual PA procedure, SI-UT-130 R3. This procedure has been qualified in accordance with the requirements of Section XI, Appendix VIII, Supplement 10 for the manual PA UT examination technique. This technique has been Performance Demonstration Initiative-qualified to detect and characterize (length and depth size) service-induced damage in the form of Primary Water Stress Corrosion Cracking (PWSCC). The SI-UT-130 R3 procedure is also qualified to scan DM welds with single-sided access. This single-sided access qualification allows for full interrogation of DM welds that have cast stainless steel safe ends, or restrict scanning conditions from the opposite side. The application of Structural Integrity’s PA UT technology allows for a reduction in the number of required examination scans across the surface of the component, while matching or exceeding the maximum achievable coverage of the Code-required weld and adjacent base material volume of any currently

## ATTACHMENT (1)

### RELIEF REQUEST FOR CALVERT CLIFFS UNIT 1 DISSIMILAR METAL BUTT WELD EXAMINATIONS (RR-ISI-04-06A)

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qualified ultrasonic technique. The capability of PA to provide increased examination coverage is inherently evident when applied to limited-access scanning surfaces.

Using the PA technique, examination coverage is greater than conventional techniques for constrained configurations. This is because the procedure employs a large number of discrete examination angles (including credit for a low angle of 30-degrees), which, in addition to increased examination coverage, provides superior material insonification by utilizing many different angular sound paths, thereby optimizing penetration into highly attenuative materials. The technique also includes a 10 degree electronic skew for circumferential scanning beam angles, which significantly improves examination coverage. Where improvement of coverage could be realized, Calvert Cliffs performed additional surface preparation.

The major limitation to achieving essentially 100 percent coverage and/or 100 percent coverage of the susceptible examination volume is the presence of cast stainless steel. All DM welds  $\geq 12$  inches contain cast stainless steel safe ends. For these welds containing cast stainless steel items, no component qualification supplement is available in Section XI, Appendix VIII. Therefore, the required examination volume was examined by Section XI, Appendix VIII, Supplement 10-qualified procedures to the maximum extent practical including 100 percent of the susceptible material volume (non-stainless steel volume).

As specified in IWA-2232 (ASME Section XI, 2004), the ultrasonic examination of piping welds is required to be performed in accordance with Appendix I. Appendix I requires that ultrasonic examination procedures, equipment, and personnel are to be qualified by Performance Demonstration in accordance with Section XI, Appendix VIII. Since requirements within Section XI, Appendix VIII for examination of cast austenitic component types are in the course of preparation, VIII-3110(c) requires the use of Appendix III. Subsequently, the requirements for Appendix III, paragraph III-1100 apply. Paragraph III-1100(c) allows alternative examination techniques, calibration block designs, and materials as provided in IWA-2240, except when the requirements of paragraph III-3430 apply. Paragraph III-3430 allows an alternate calibration block layout, provided similar beam paths are utilized, and allows additional reflectors provided they do not interfere with establishing the primary reference. Supplement 1 of Appendix III describes additional requirements for examination of austenitic and DM welds which are in combination with cast materials. Supplement 1(b)(4) cautions that cast austenitic materials may preclude meaningful examinations because of geometry and attenuation variables.

Dissimilar metal welds with cast austenitic material were examined using procedures, equipment, and personnel which were qualified on samples containing real cracks, realistic configurations, and cast austenitic materials. The qualified examination process applied includes calibration requirements with similar ultrasonic beam paths, scanning sensitivity based on the maximum allowable within the materials, and an array of angles from 30 to 70 degrees. These examination processes are superior to the requirements of Appendix III which does not require qualification on blind samples containing real cracks or realistic configurations.

This examination process meets IWA-2240 because the application of PA techniques qualified under the rules of Section XI, Appendix VIII provides a superior examination with newly developed techniques that have been reviewed and demonstrated to the Authorized Nuclear Inservice Inspector.

All of the unmitigated welds are found in lower temperature regions of the reactor coolant system (at temperatures near  $T_{cold}$ ). Therefore, there is a lower probability of crack initiation and a slower crack

## ATTACHMENT (1)

### RELIEF REQUEST FOR CALVERT CLIFFS UNIT 1 DISSIMILAR METAL BUTT WELD EXAMINATIONS (RR-ISI-04-06A)

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growth rate. These welds are also highly flaw tolerant, as demonstrated in MRP-109 (Reference 2). As shown in this reference, continued operation without repair can be demonstrated for substantial flaw sizes.

Where appropriate, contouring has already been completed on the examination surface. Further actions are limited by the design minimum wall calculations for the piping. Additional axial flaw coverage would require a weld build up of the DM weld followed by additional contouring and a Construction Code required radiography examination. This additional contouring to improve axial coverage is a hardship that does not result in an increase to health and safety of the public.

Additionally, bare metal visual examinations in accordance with ASME Code Case N-722 were performed on the subject components of the reactor coolant pressure boundary during the 2010 refueling outage. Those examinations identified no evidence of leakage for these components. During refueling outages, qualified examiners walk down Class 1 systems at pressurized conditions and cold shutdown conditions. These walkdowns are performed to satisfy ASME Code pressure testing requirements and the Boric Acid Corrosion Control Program. Adverse conditions are addressed by the station's corrective action program.

Therefore, the UT examination coverages, which include a large percentage of the susceptible material for the circumferential and axial flaws, combined with the periodic system pressure tests and outage walk downs, provide an acceptable level of quality and safety for identifying degradation from PWSCC prior to the development of a safety significant flaw.

#### 8. Conclusion

The NRC incorporated ASME Code Case N-770-1 into 10 CFR 50.55a by reference. Specific implementing requirements are documented in 10 CFR 50.55a(g)(6)(ii)(F). The relevant examination coverage applicable to Calvert Cliffs DM welds are shown in the Table A.

Item (2) of 10 CFR 50.55a(g)(6)(ii)(F) requires the applicable DM welds to be categorized in accordance with ASME Code Case N-770-1, Table 1. This categorization has been performed and is included in this report. All DM welds  $\geq 2$  NPS at hot leg or higher operating temperatures have been previously mitigated by the MSIP™. The components, which implemented the MSIP™, need to meet the performance criteria of Mandatory Appendix I of ASME Code Case N-770-1 to be categorized as mitigated under ASME Code Case N-770-1. Since some of these mitigated welds have cast stainless steel safe ends and the Section XI, Appendix VIII supplement for cast stainless steel examination is under the course of preparation it cannot be concluded that the intended Appendix I performance criteria is fully satisfied.

All remaining DM welds have been categorized as Inspection Item B.

Item (3) of 10 CFR 50.55a(g)(6)(ii)(F) requires that baseline examinations for the welds in Table 1 of ASME Code Case N-770-1 be completed by the end of the next refueling outage after January 20, 2012. Previous examinations may be credited if they have met the following criteria:

1. Examinations were performed using a procedure that meets the requirements of ASME Code Section XI, Appendix VIII and;
2. The Code required examination volume of essentially 100 percent coverage has been obtained.

## **ATTACHMENT (1)**

### **RELIEF REQUEST FOR CALVERT CLIFFS UNIT 1 DISSIMILAR METAL BUTT WELD EXAMINATIONS (RR-ISI-04-06A)**

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If the previous examinations do not meet these requirements, they can still be used to meet the baseline examination requirements, provided that NRC approval of alternative inspection requirements is granted prior to the end of the next refueling outage after January 20, 2012.

All examinations were performed in accordance with MRP-139 (Reference 1) requirements. Results from the examinations were documented in the ISI refueling outage report. However, with the conditions imposed by 10 CFR 50.55a(g)(6)(ii)(F)(3) and (4) all welds with cast safe end material currently require regulatory approval. Therefore, reasonable assurance of quality and safety is based on the achieved coverage and the ASME Code Case N-722 visual examinations performed.

#### **9. Duration of Proposed Alternative**

Relief is requested to accept the baseline examinations performed in 2010 for the Fourth Ten-year Interval of the Inservice Inspection Program for Calvert Cliffs which was effective from October 2009, ending on June 30, 2019 for Unit 1.

#### **10. References**

1. EPRI MRP-139, Revision 1, Material Reliability Program: Primary System Piping Butt Weld Inspection and Evaluation Guideline, December 2009, Electric Power Research Institute
2. EPRI MRP-109, Revision 0, Materials Reliability Program Alloy 82/182 Pipe Butt Weld Safety Assessment for U. S. PWR Plant Designs, April 2005, Electric Power Research Institute



**ENCLOSURE 1**

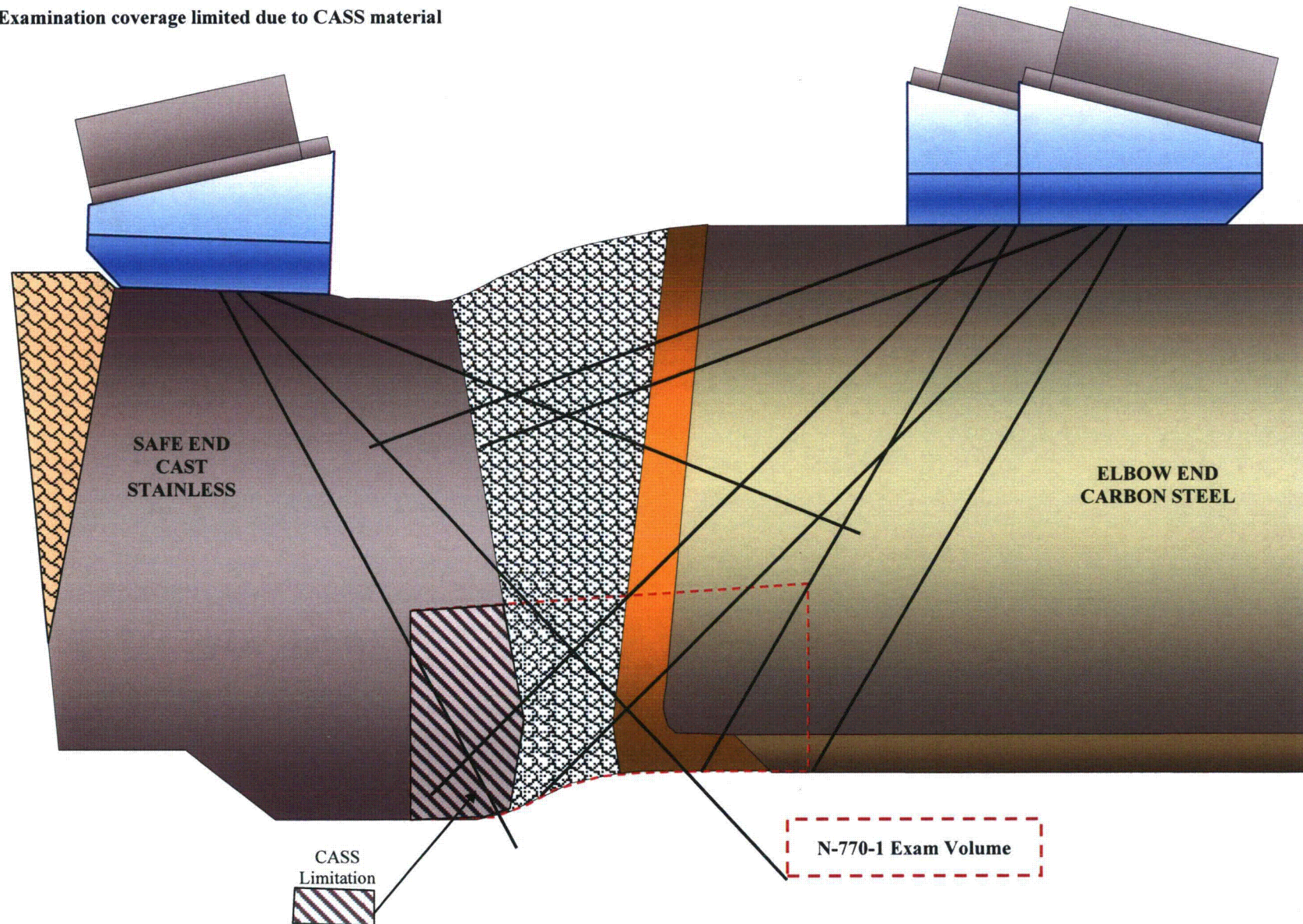
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**UNIT 1 EXAMINATION COVERAGE PLOTS**

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**102300 / 30-RC-11A-7**

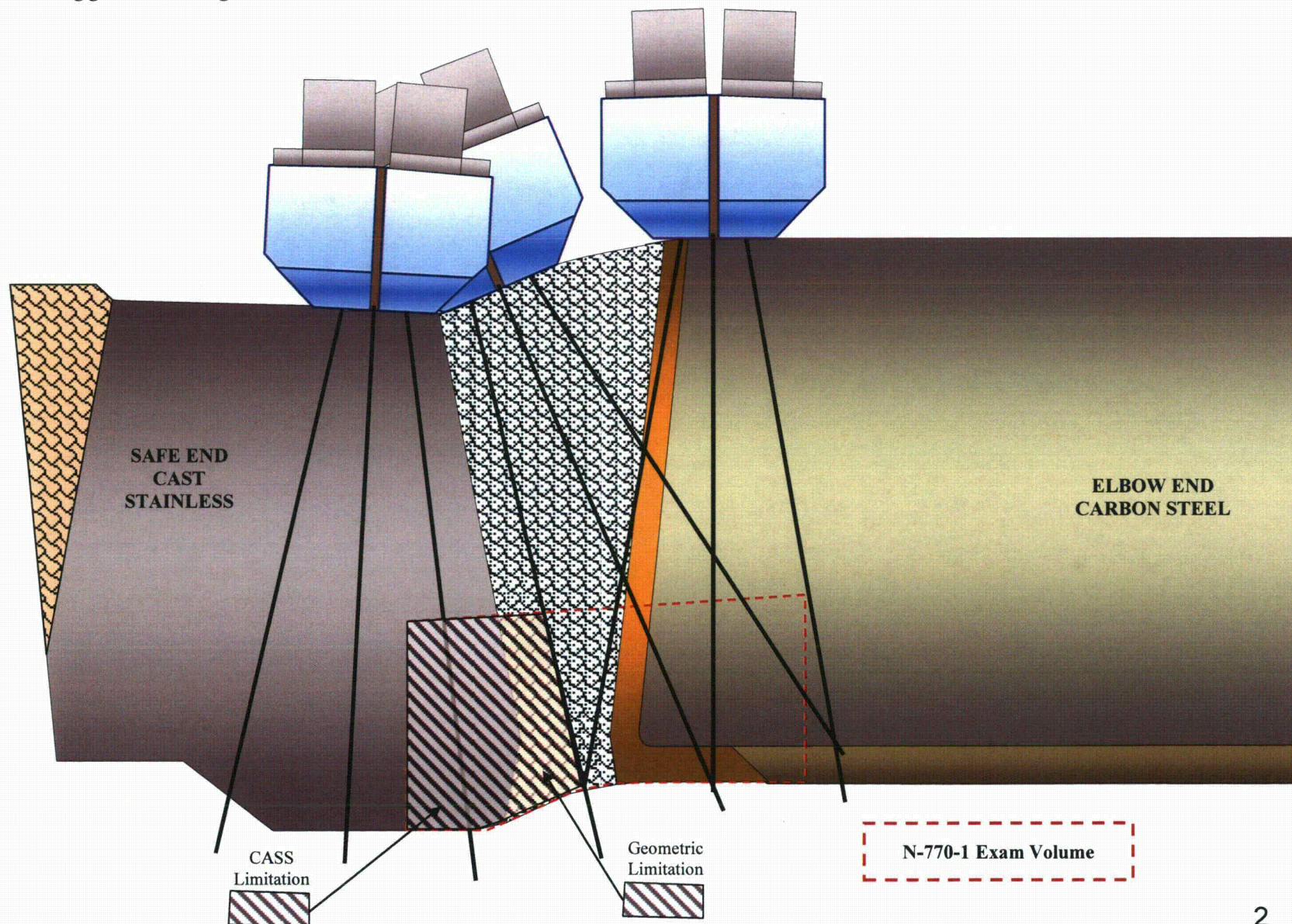
Examination coverage limited due to CASS material





**102300 / 30-RC-11A-7**

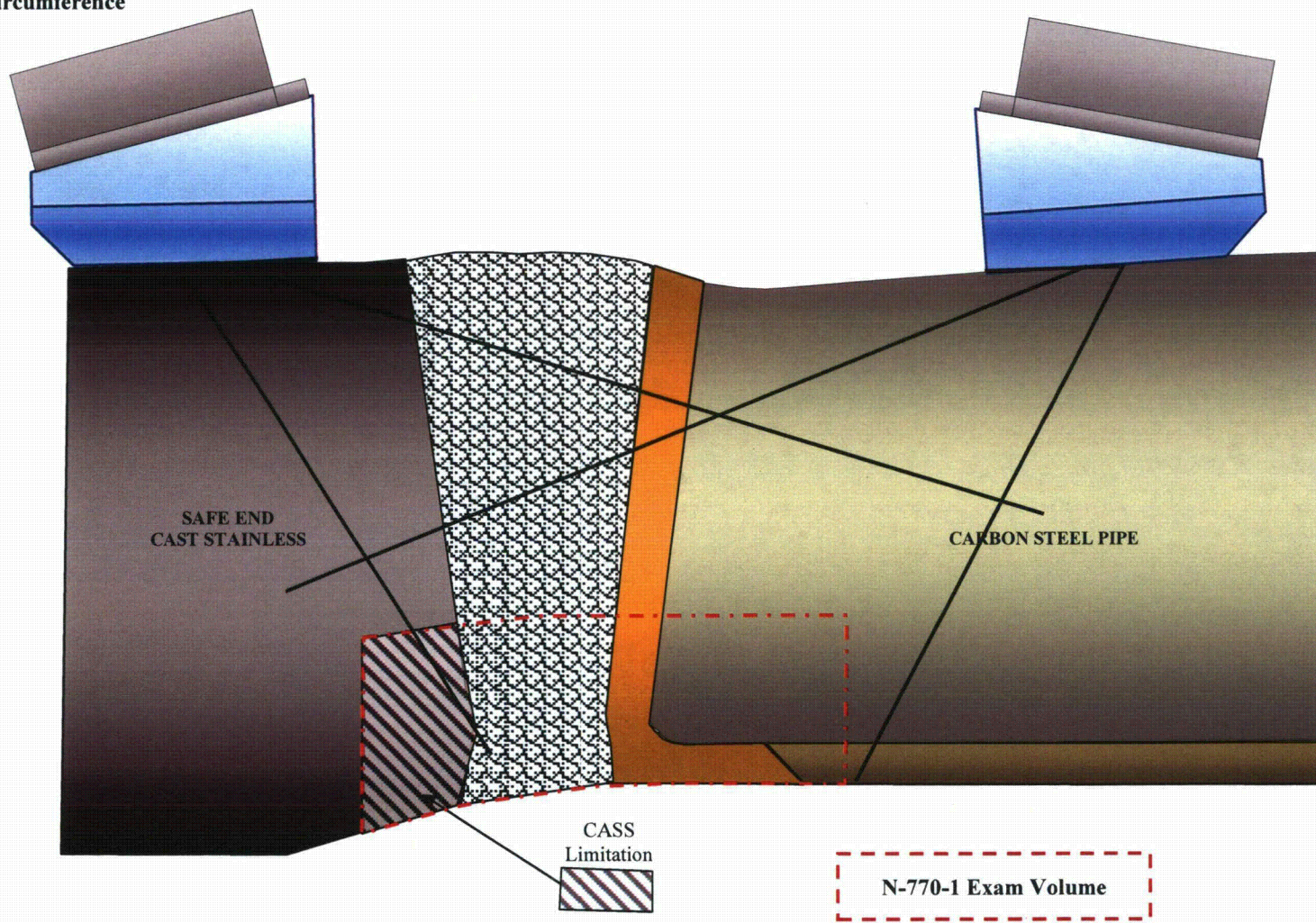
**Examination coverage limited due to CASS material  
and existing geometric configuration**





**102450 / 30-RC-11A-10**

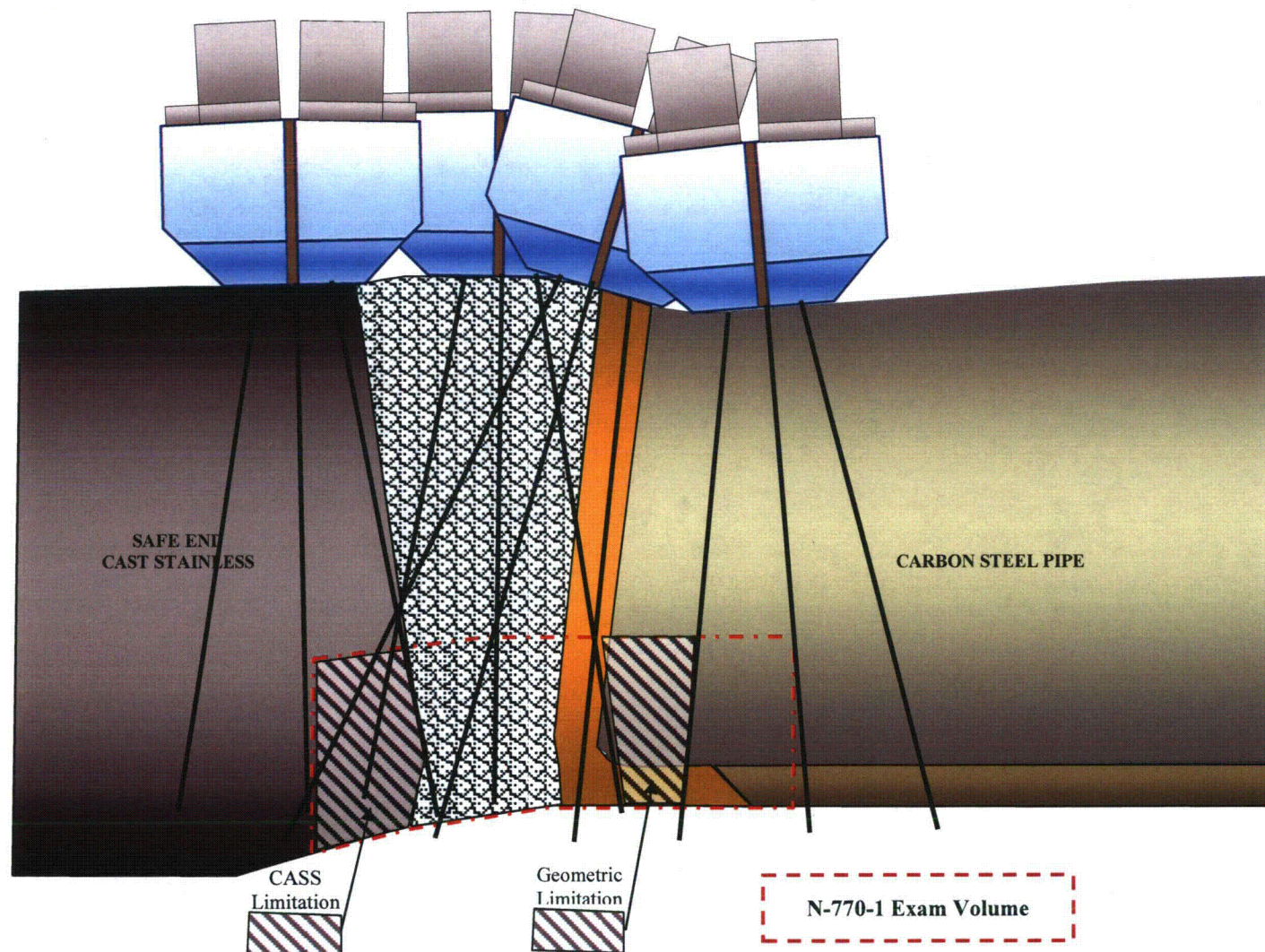
Examination coverage limited due to CASS material  
and Cold Leg Spray nozzle obstruction for 6.5" of  
total circumference





**102450 / 30-RC-11A-10**

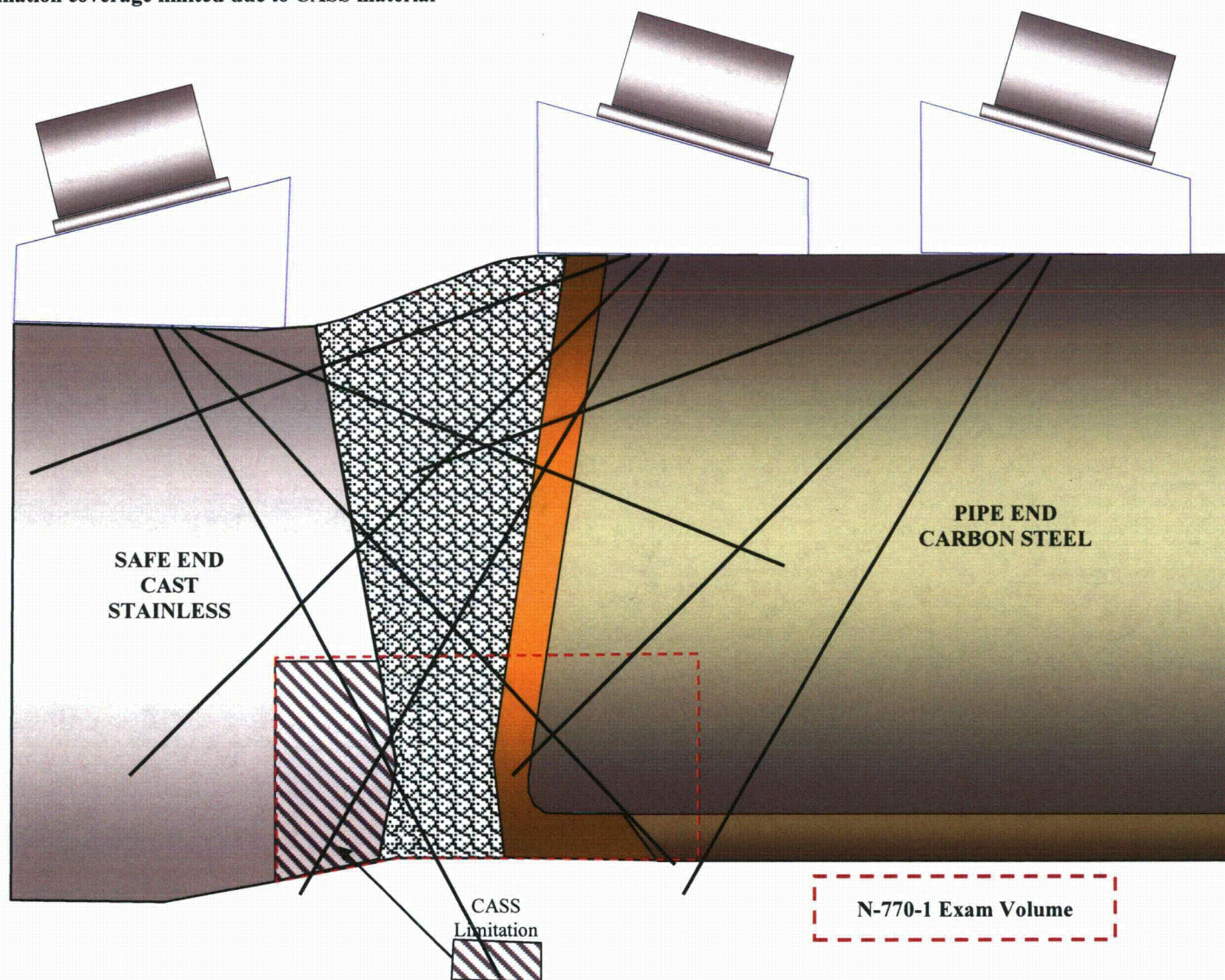
**Examination coverage limited due to CASS material  
and existing geometric configuration**





**104550 / 30-RC-11B-7**

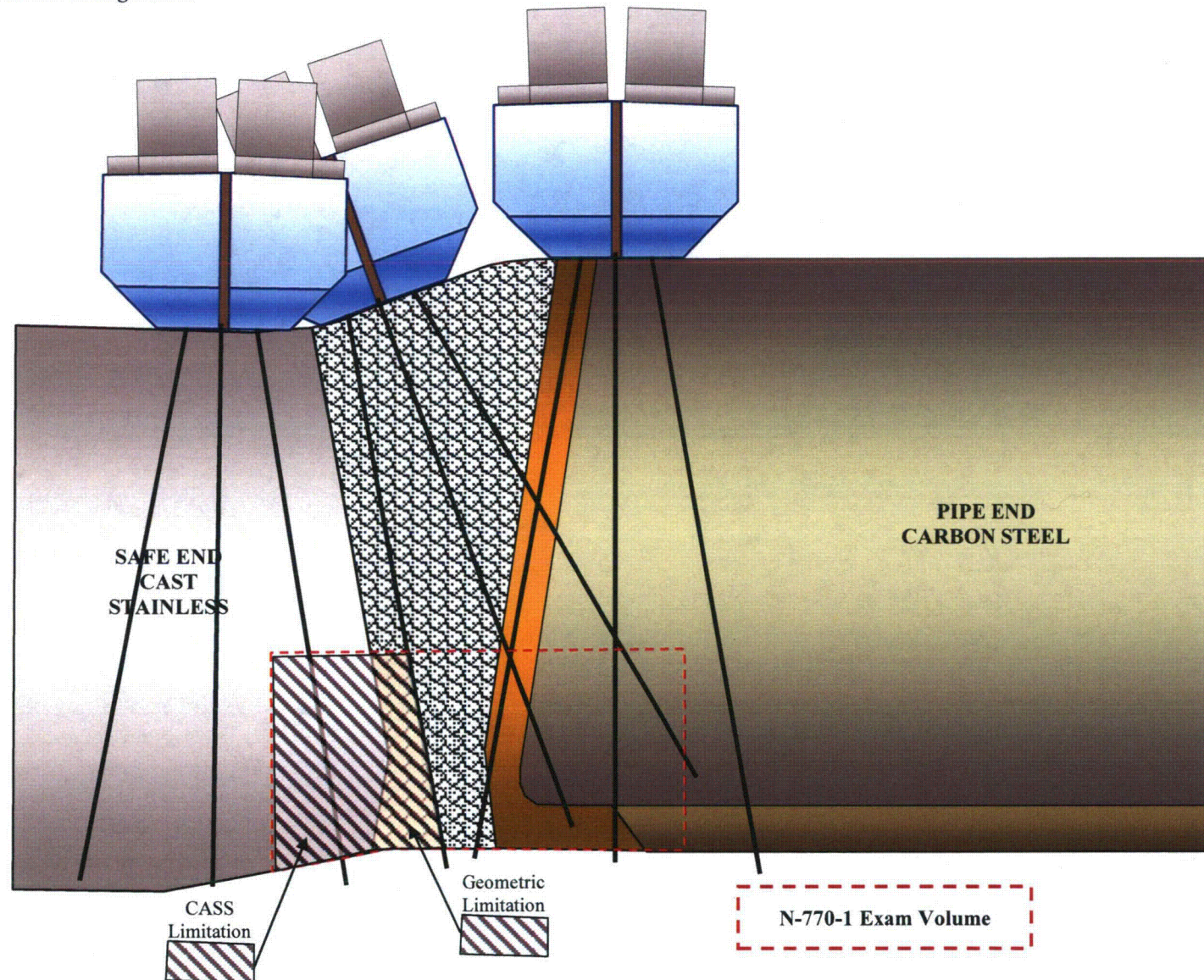
Examination coverage limited due to CASS material





**104550 / 30-RC-11B-7**

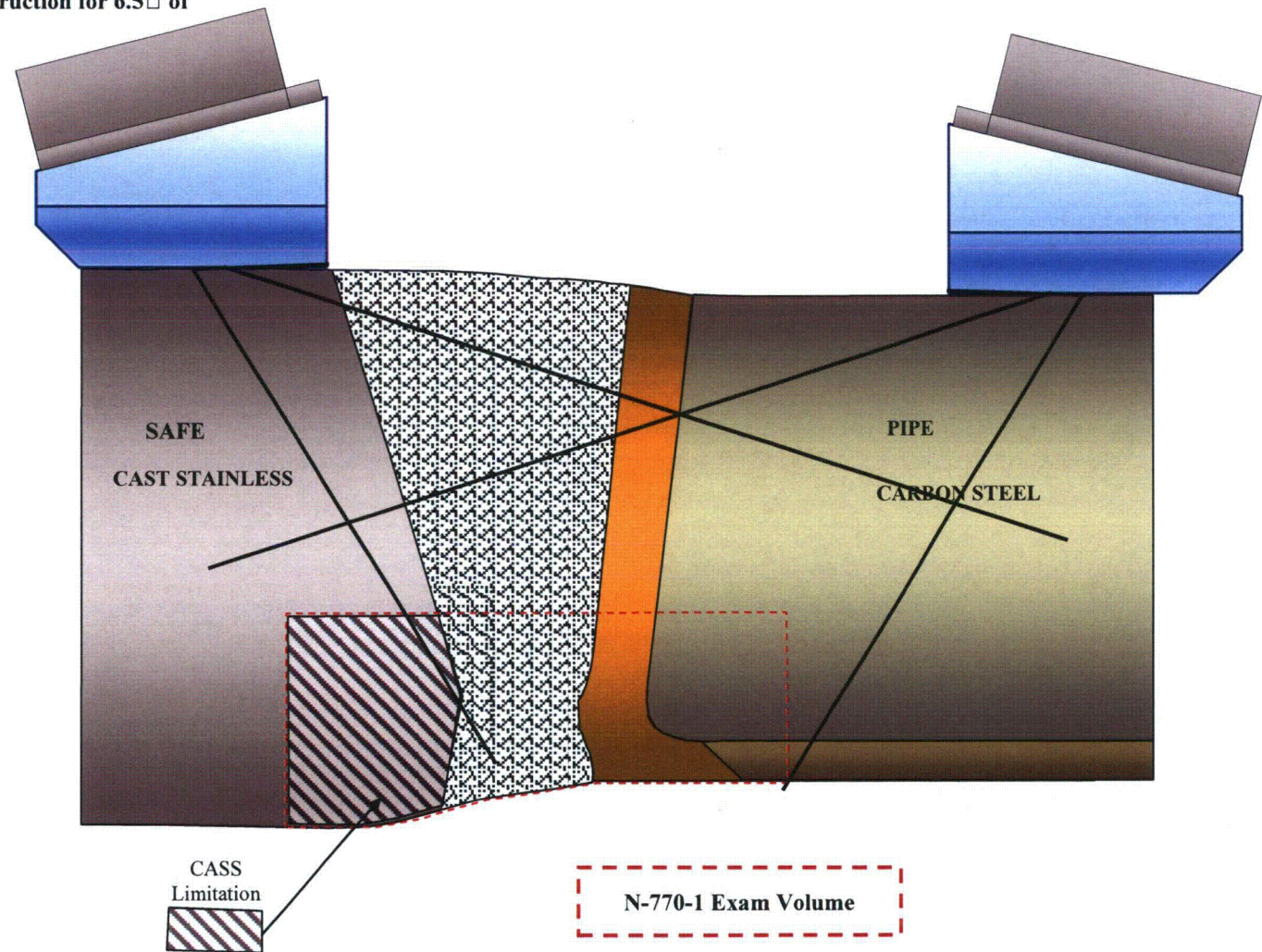
**Examination coverage limited due to CASS material  
and existing geometric configuration**





**104700 / 30-RC-11B-10**

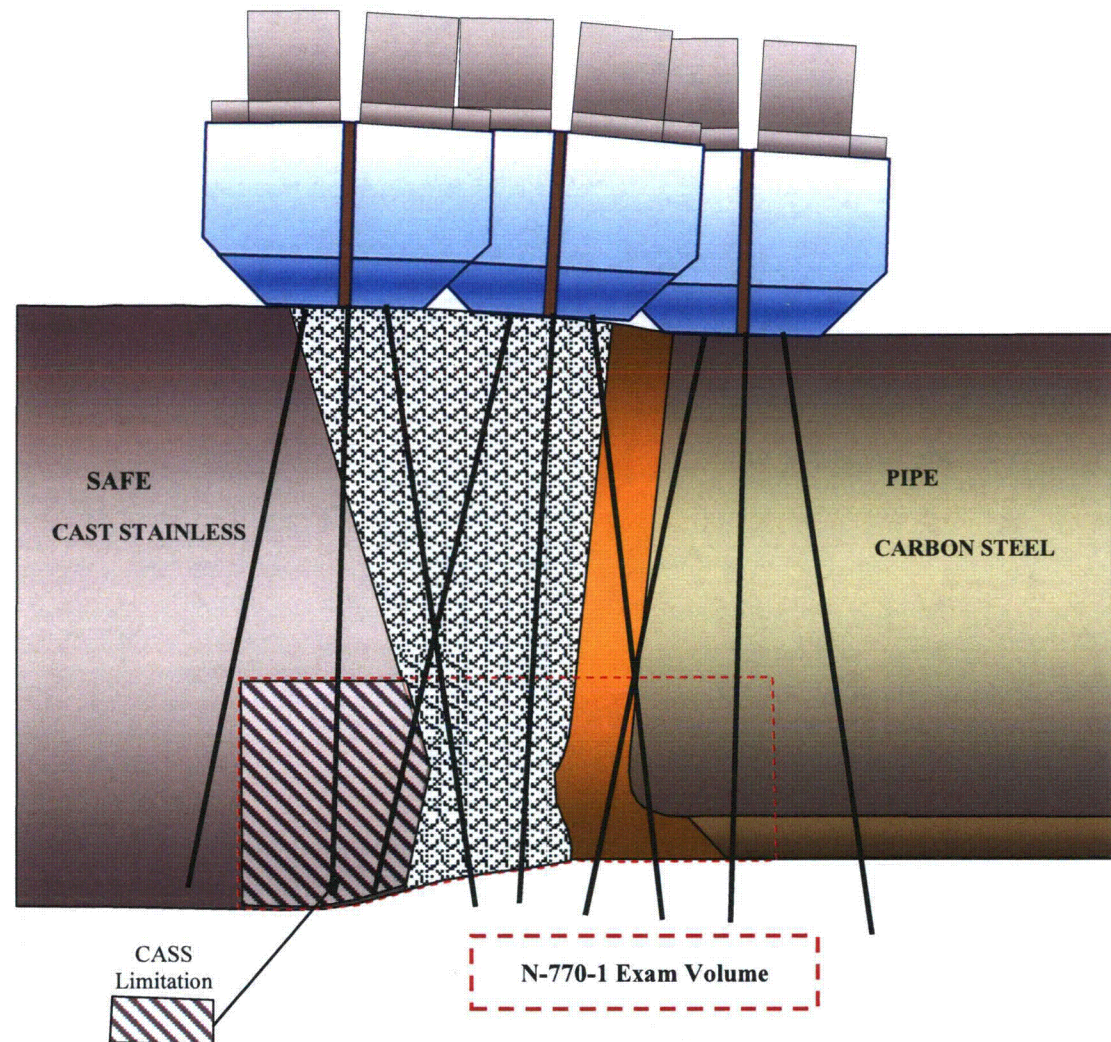
Examination coverage limited due to CASS material  
and Cold Leg Spray nozzle obstruction for 6.5% of  
total circumference





**104700 / 30-RC-11B-10**

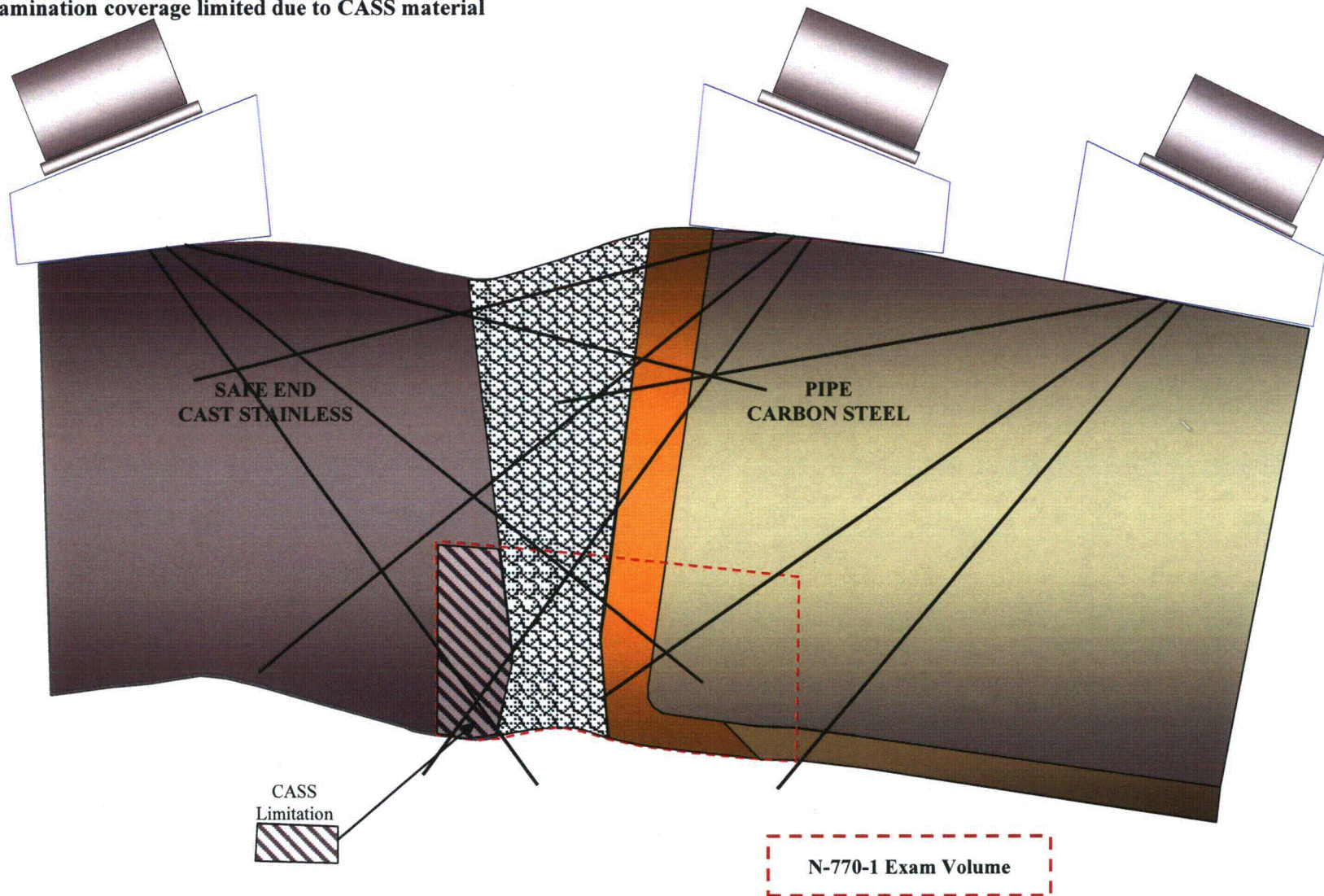
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**107450 / 30-RC-12A-7**

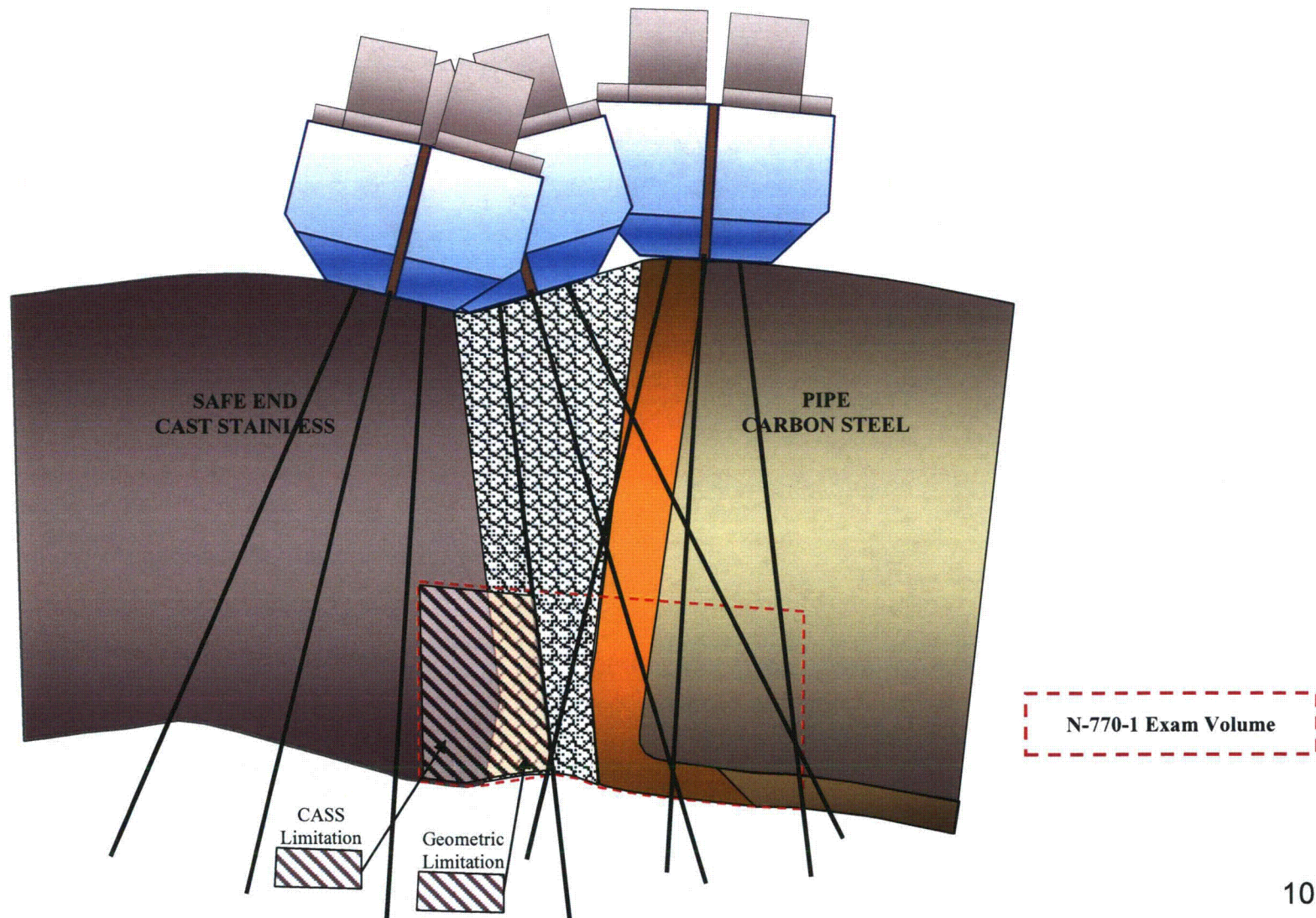
Examination coverage limited due to CASS material





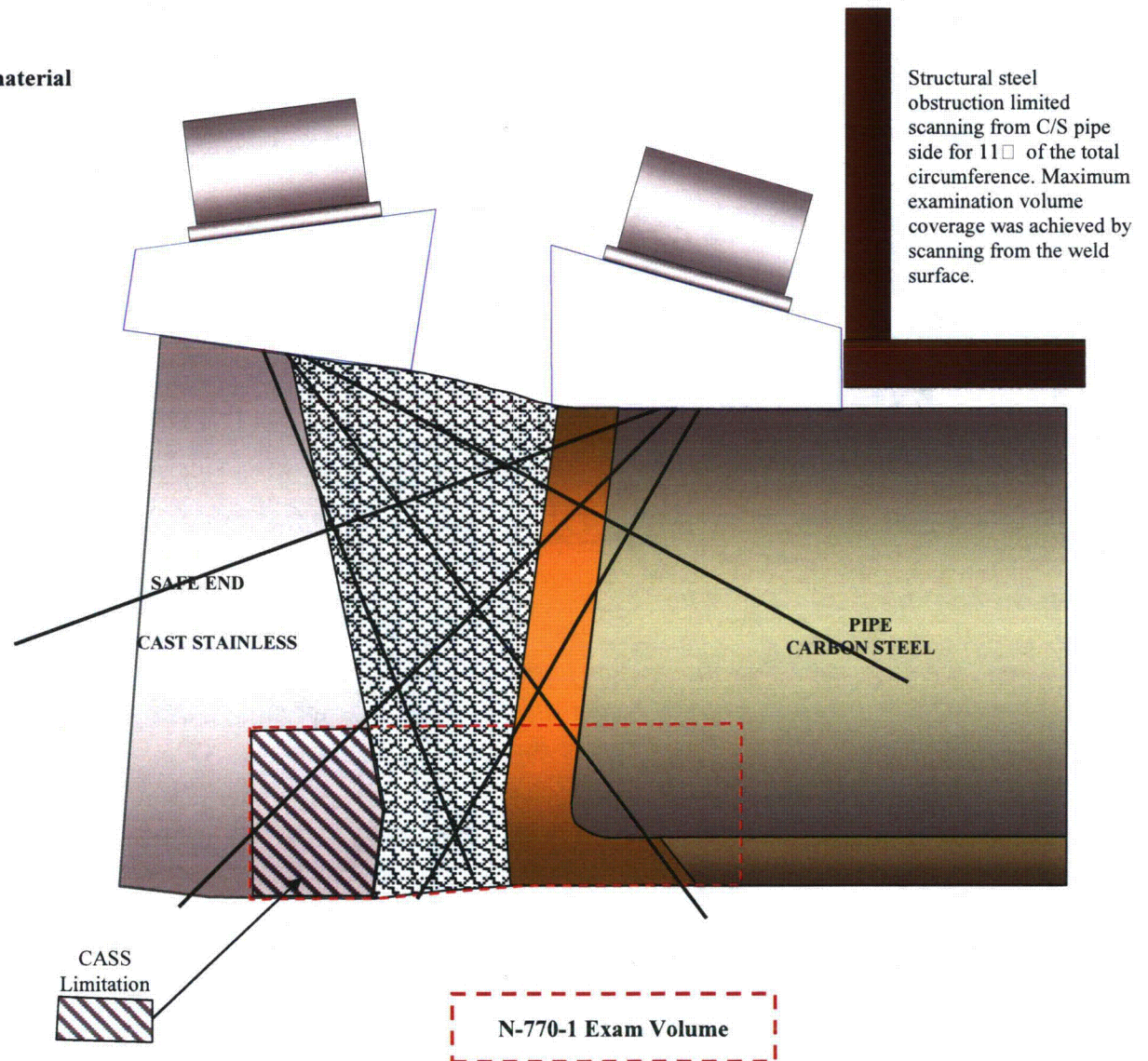
**107450 / 30-RC-12A-7**

Examination coverage limited due to CASS material  
and existing geometric configuration



### 107600 / 30-RC-12A-10

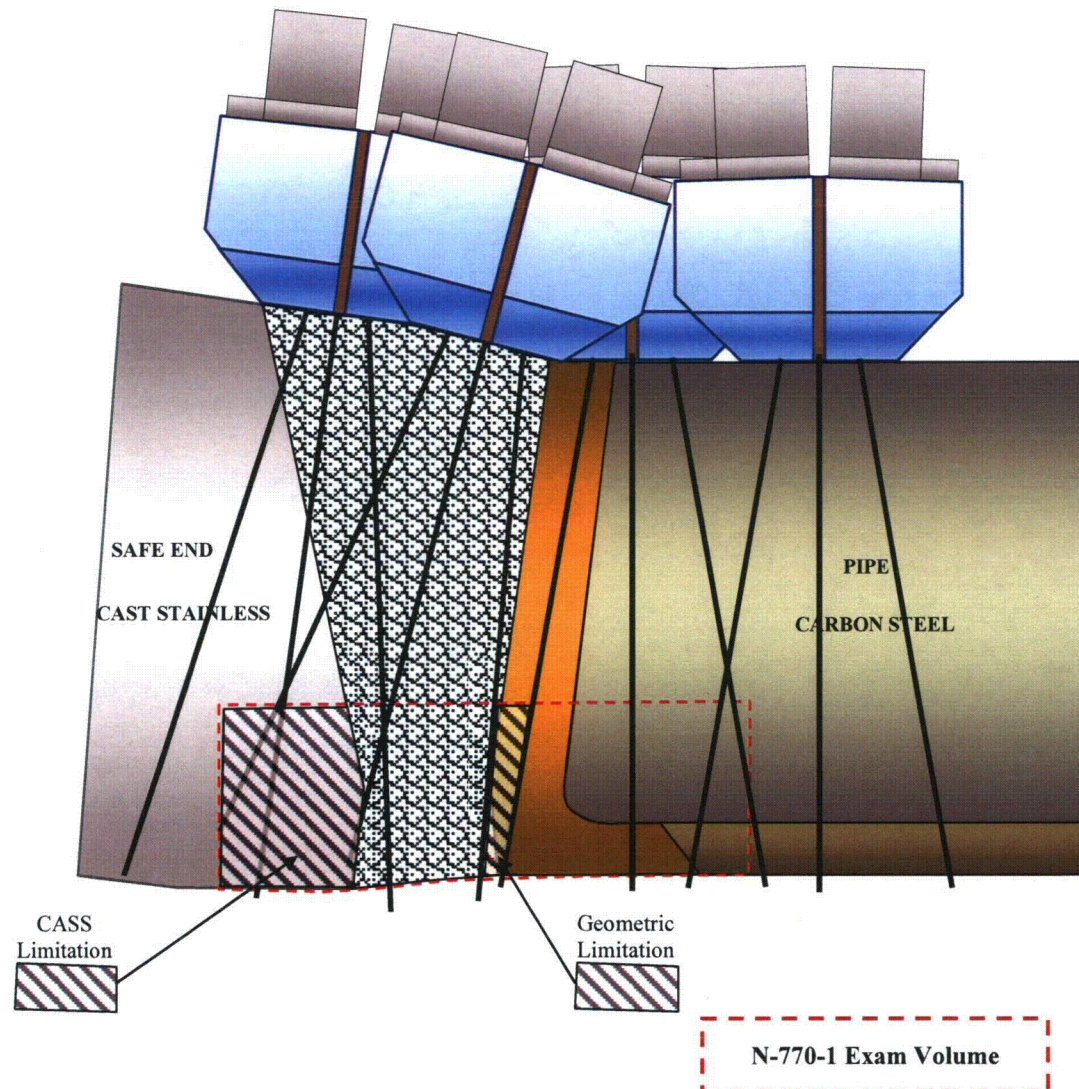
Examination coverage limited due to CASS material  
and structural steel support





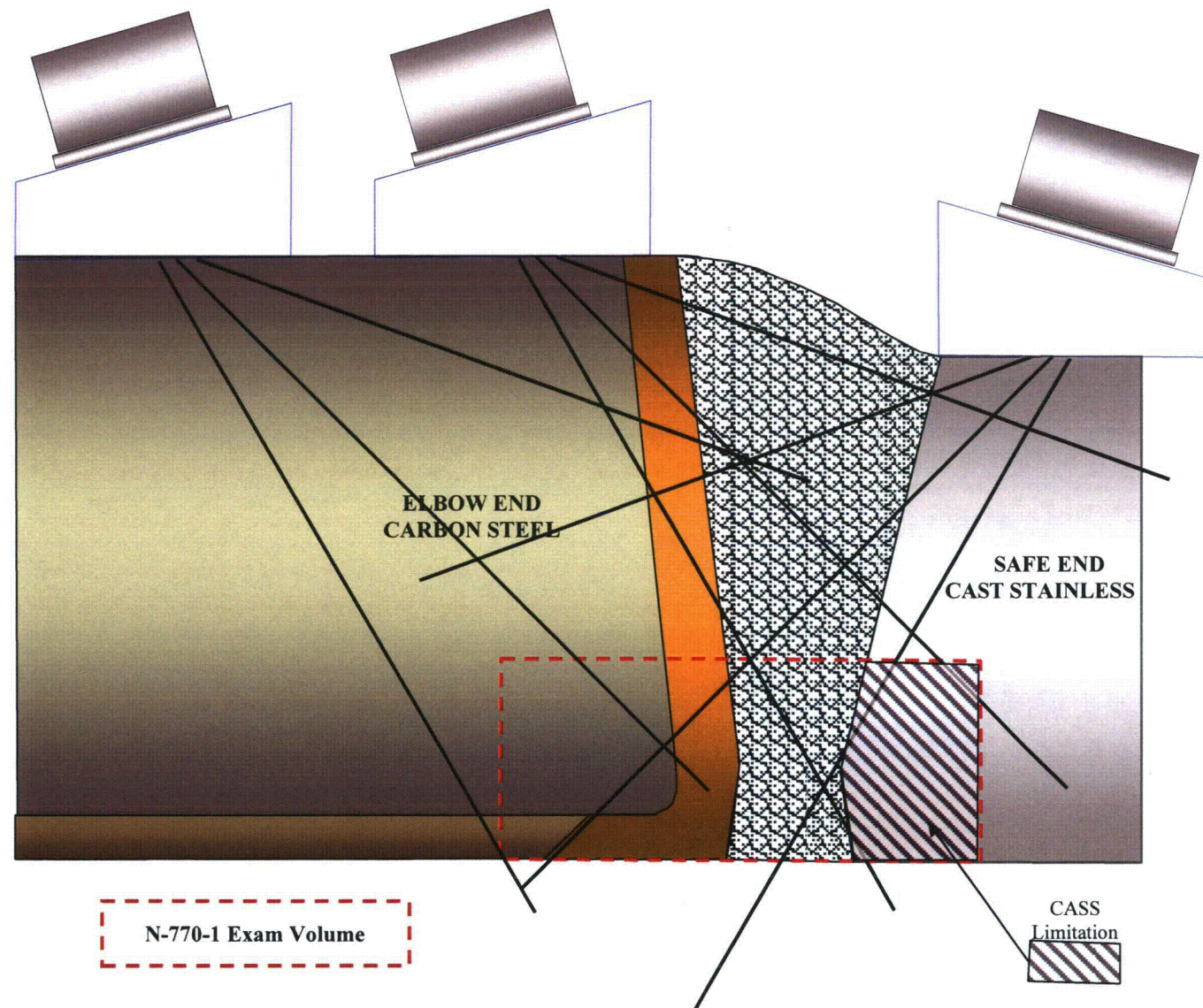
## 107600 / 30-RC-12A-10

Examination coverage limited due to CASS material  
and existing geometric configuration



**109600 / 30-RC-12B-7**

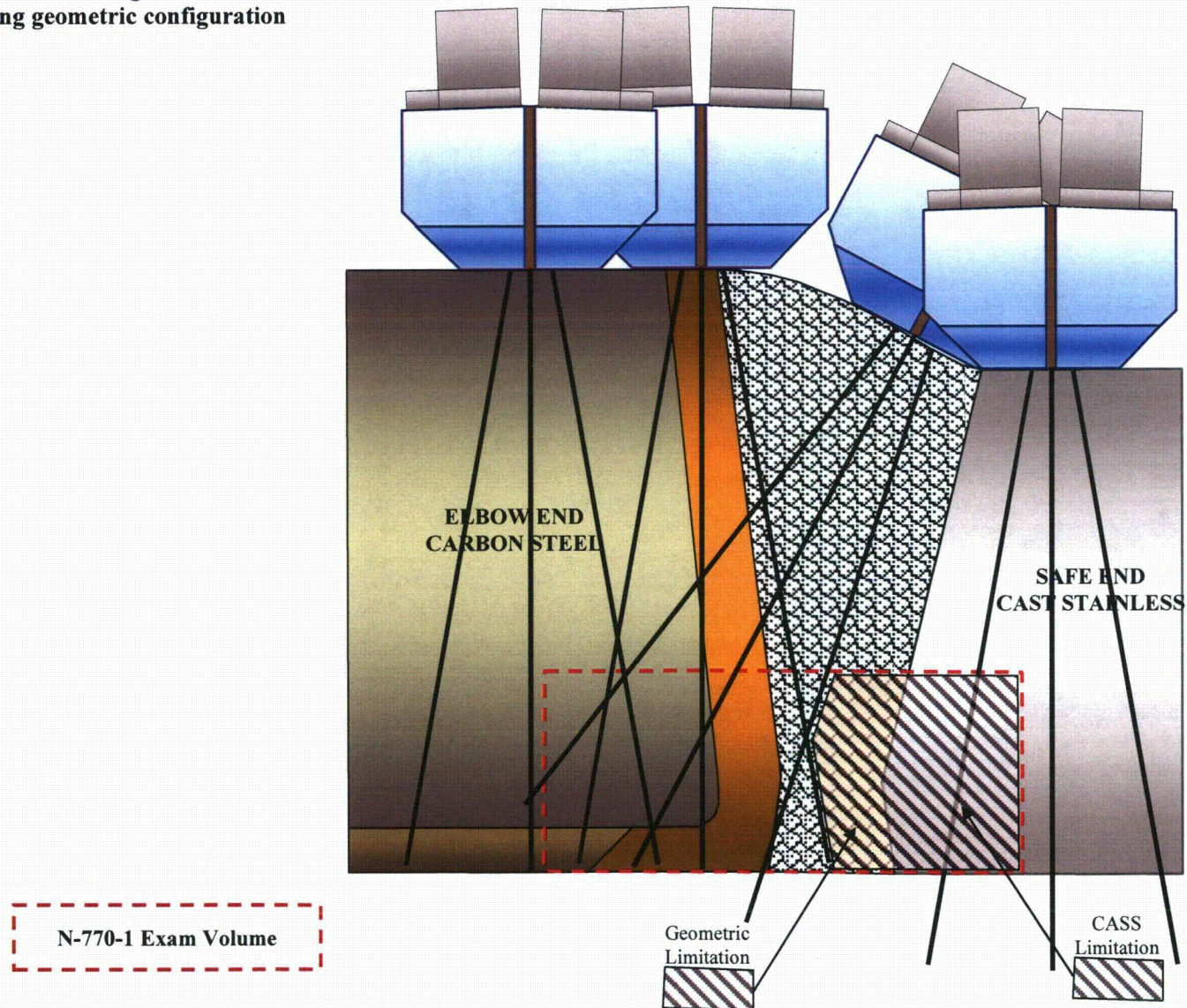
Examination coverage limited due to CASS material





**109600 / 30-RC-12B-7**

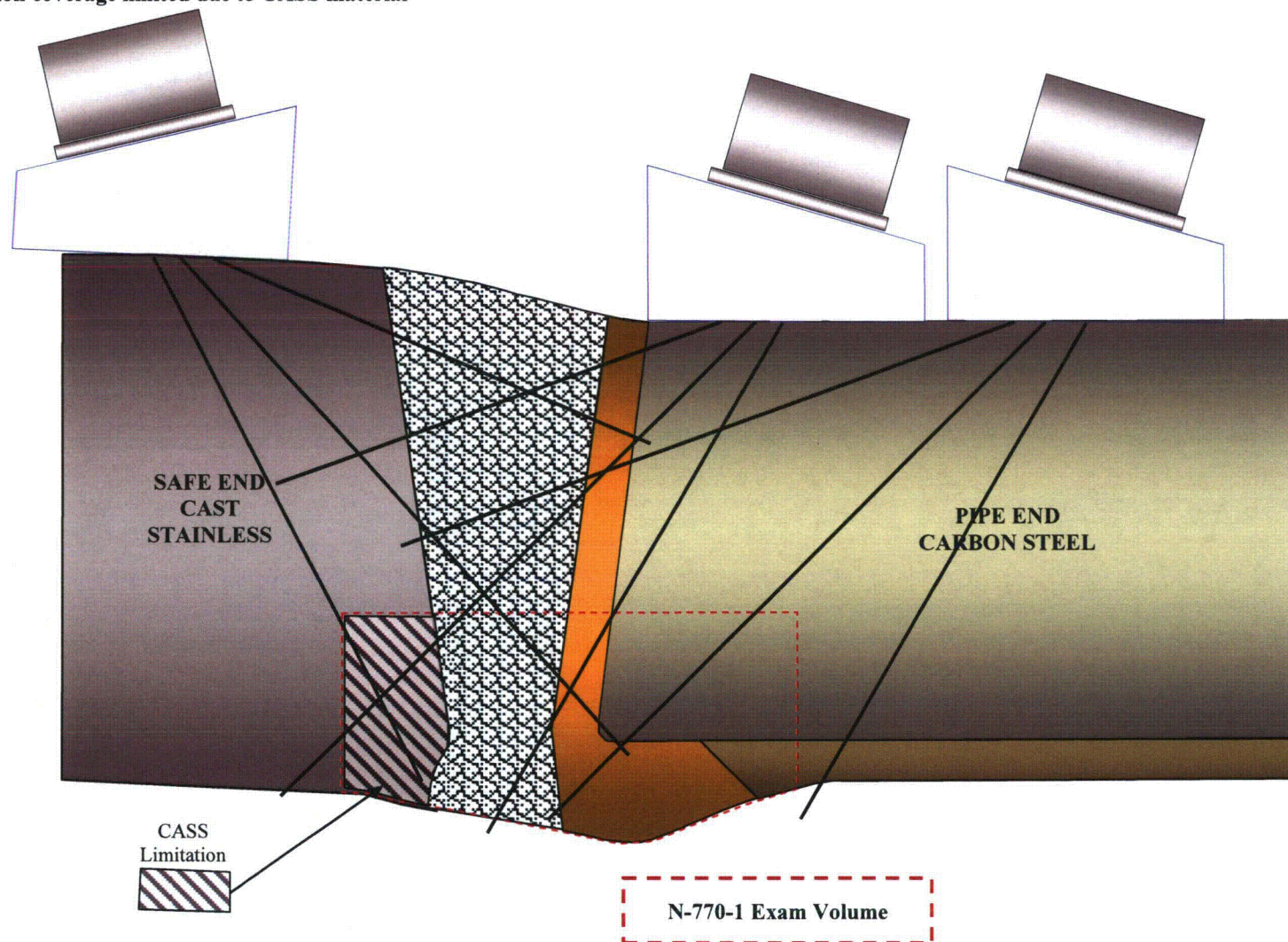
**ASME Sec XI Coverage limited due to CASS material  
and existing geometric configuration**





**109750 / 30-RC-12B-10**

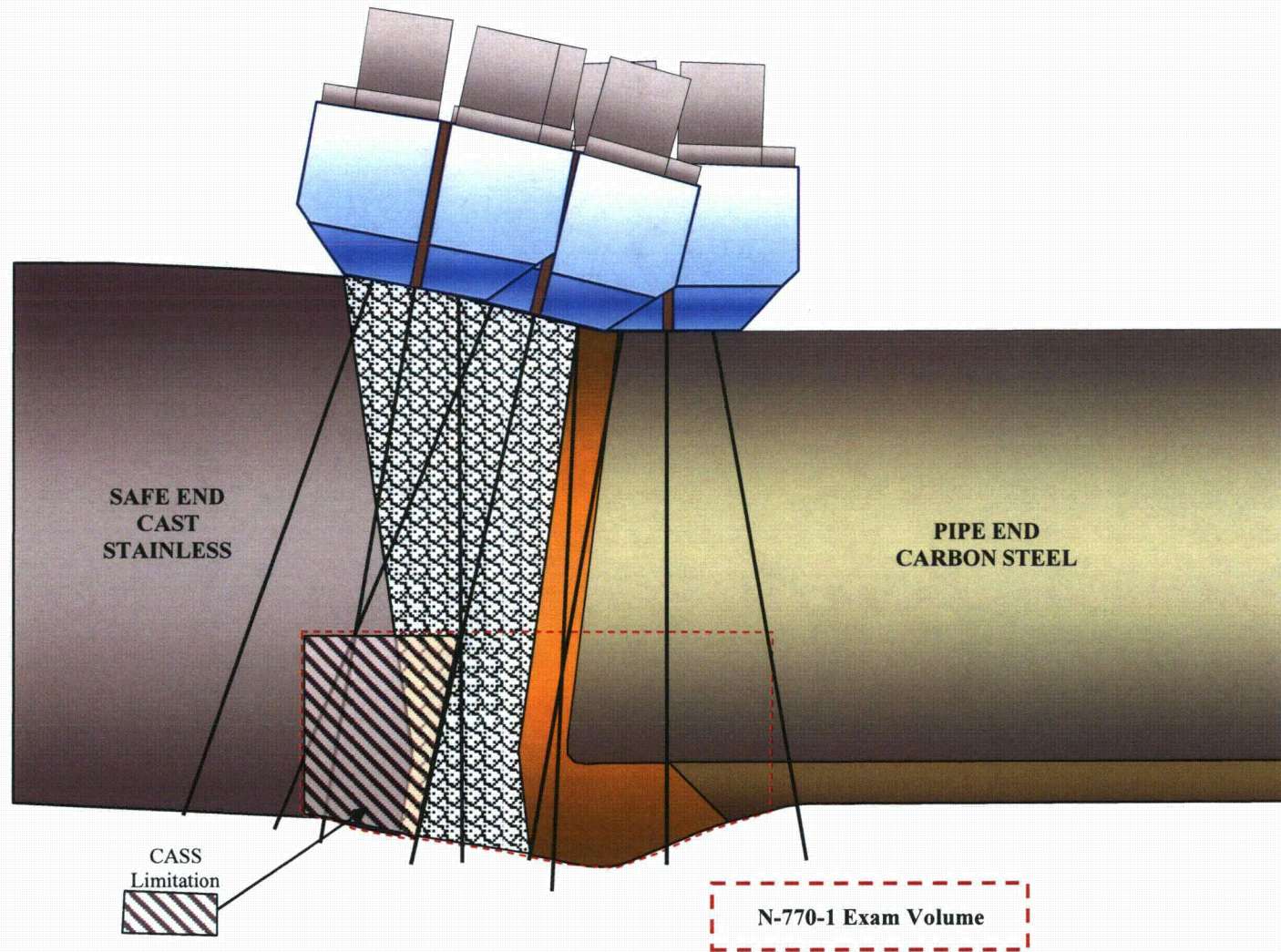
Examination coverage limited due to CASS material





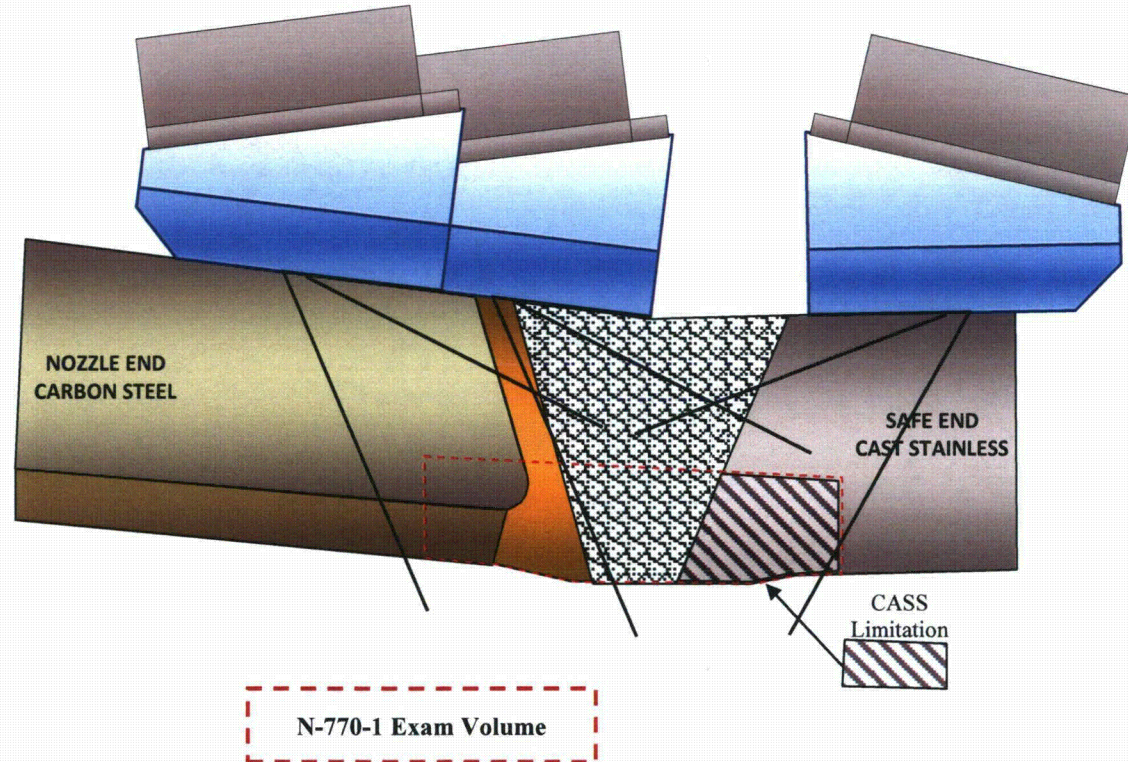
**109750 / 30-RC-12B-10**

**Examination coverage limited due to CASS material**



## 110450 / 12-PSL-1

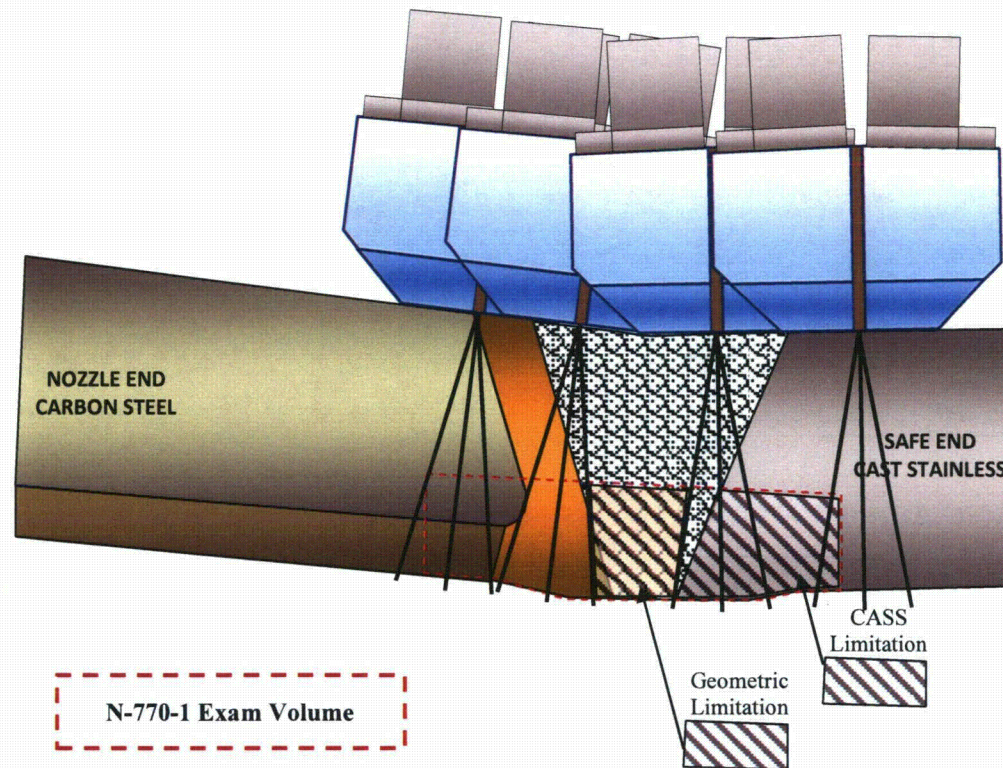
Examination coverage limited due to CASS material





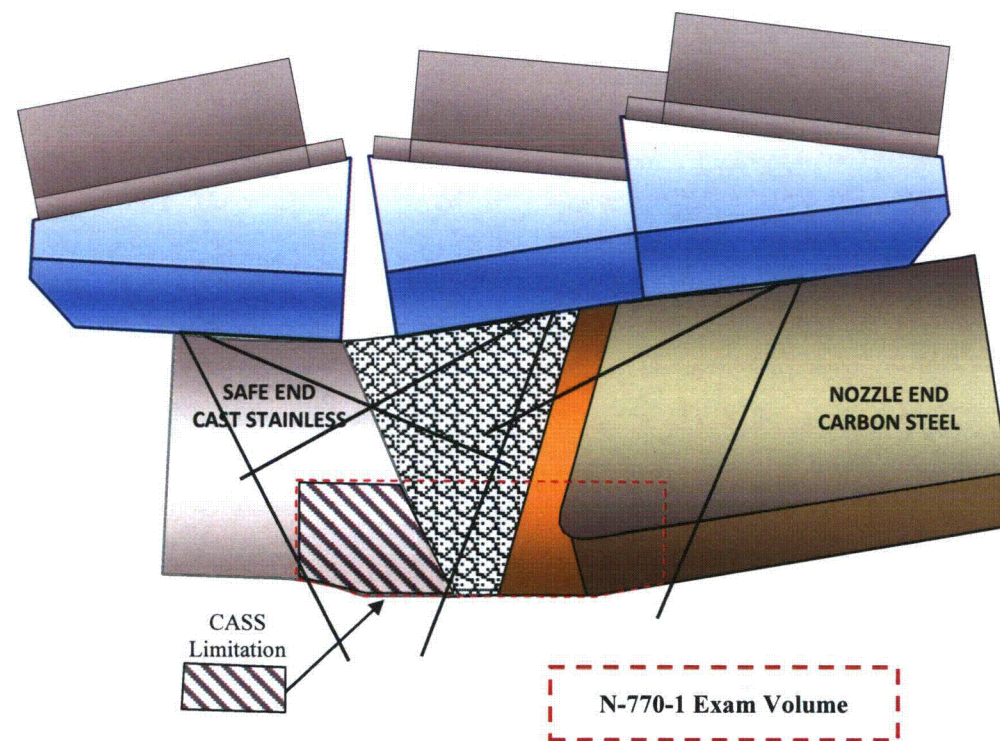
## 110450 / 12-PSL-1

Examination coverage limited due to CASS material  
and existing geometric configuration



### 111100 / 12-PSL-13

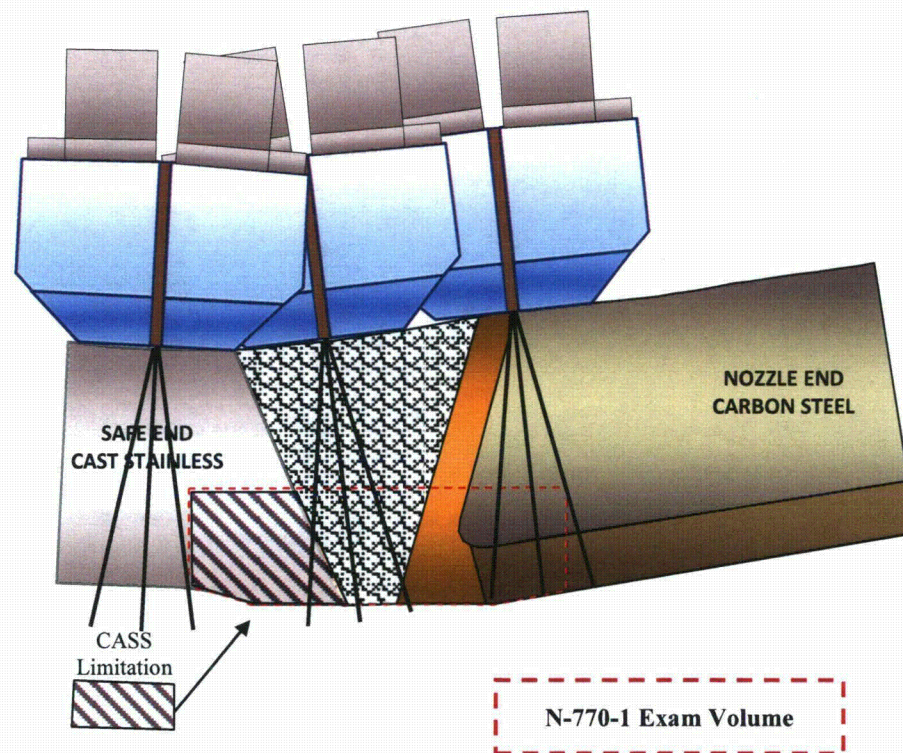
Examination coverage limited due to CASS material





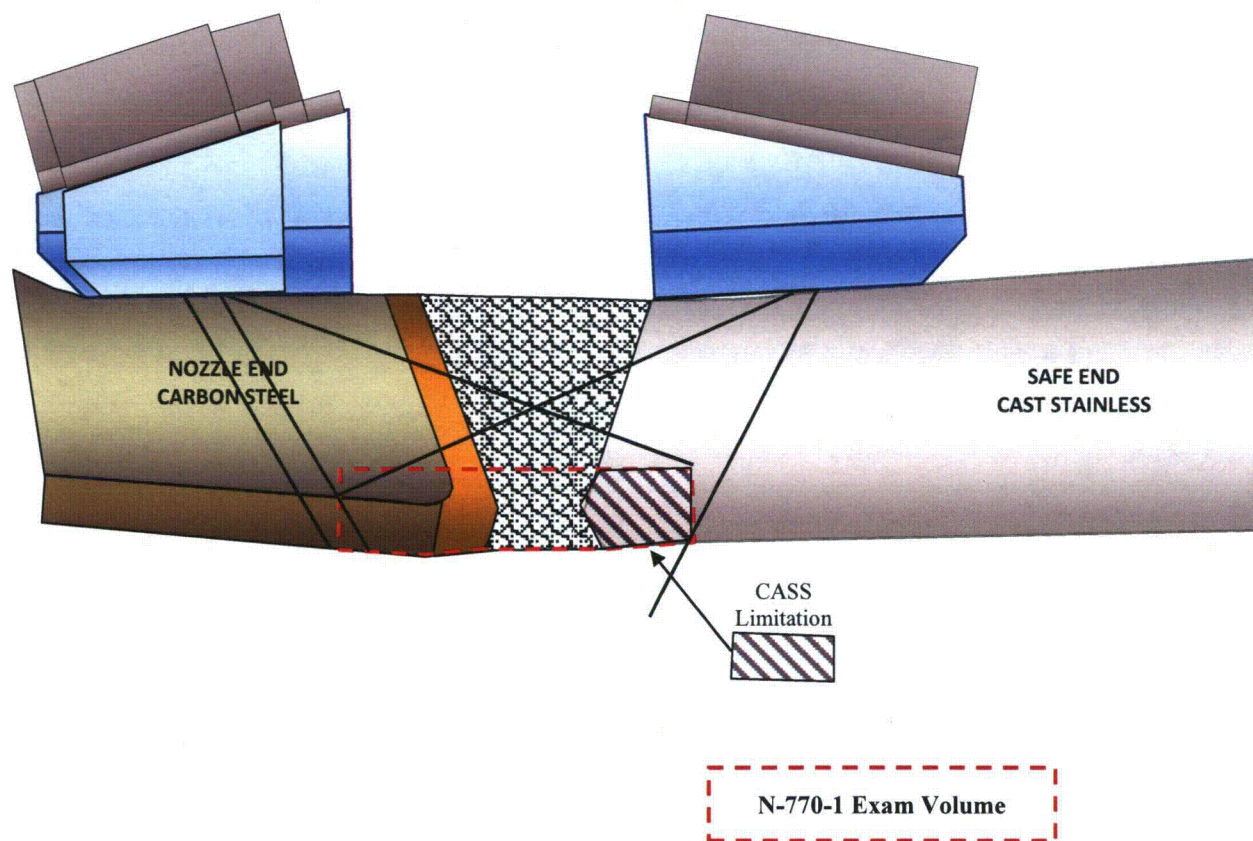
## 111100 / 12-PSL-13

Examination coverage limited due to CASS material



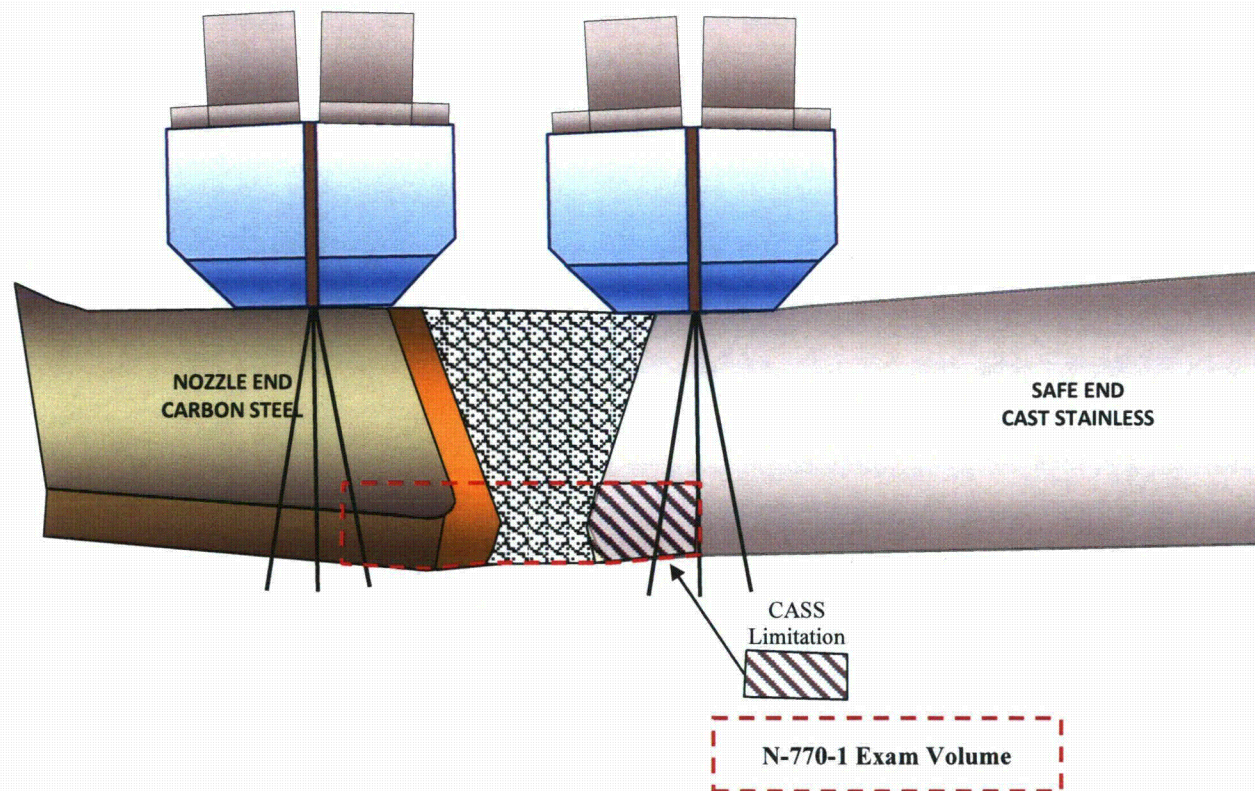
**113150 / 12-SC-1004-1**

**Examination coverage limited due to CASS material**



## 113150 / 12-SC-1004-1

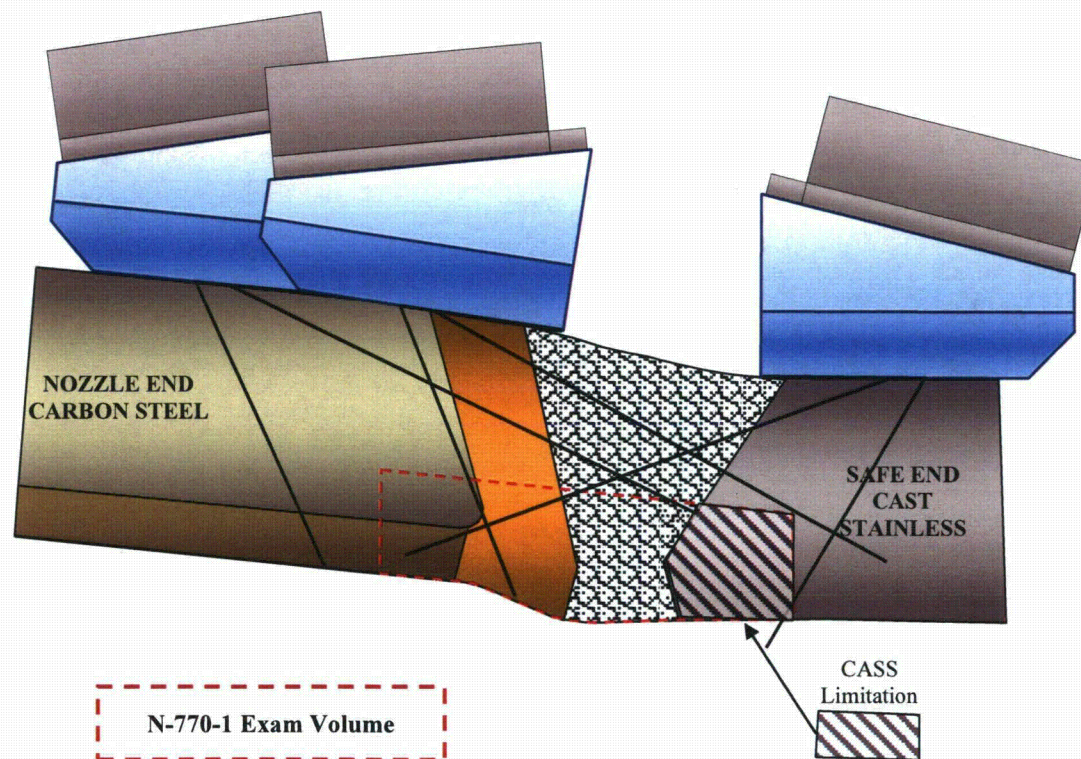
Examination coverage limited due to CASS material





**114350 / 12-SI-1009-16**

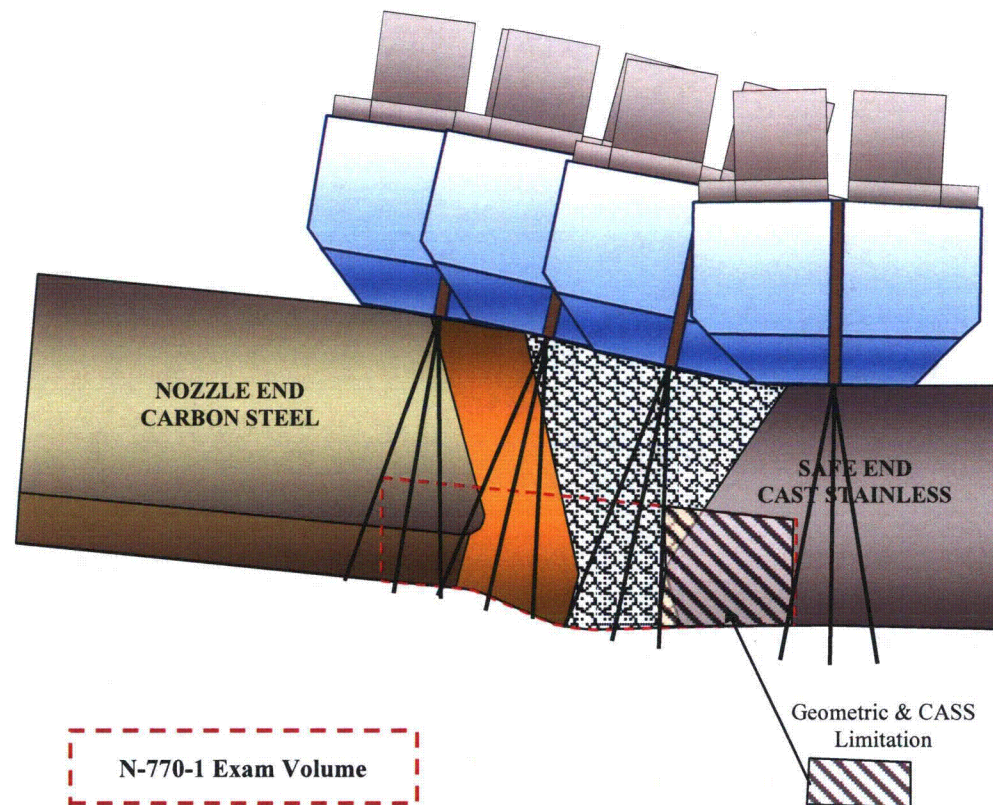
**Examination coverage limited due to CASS material**





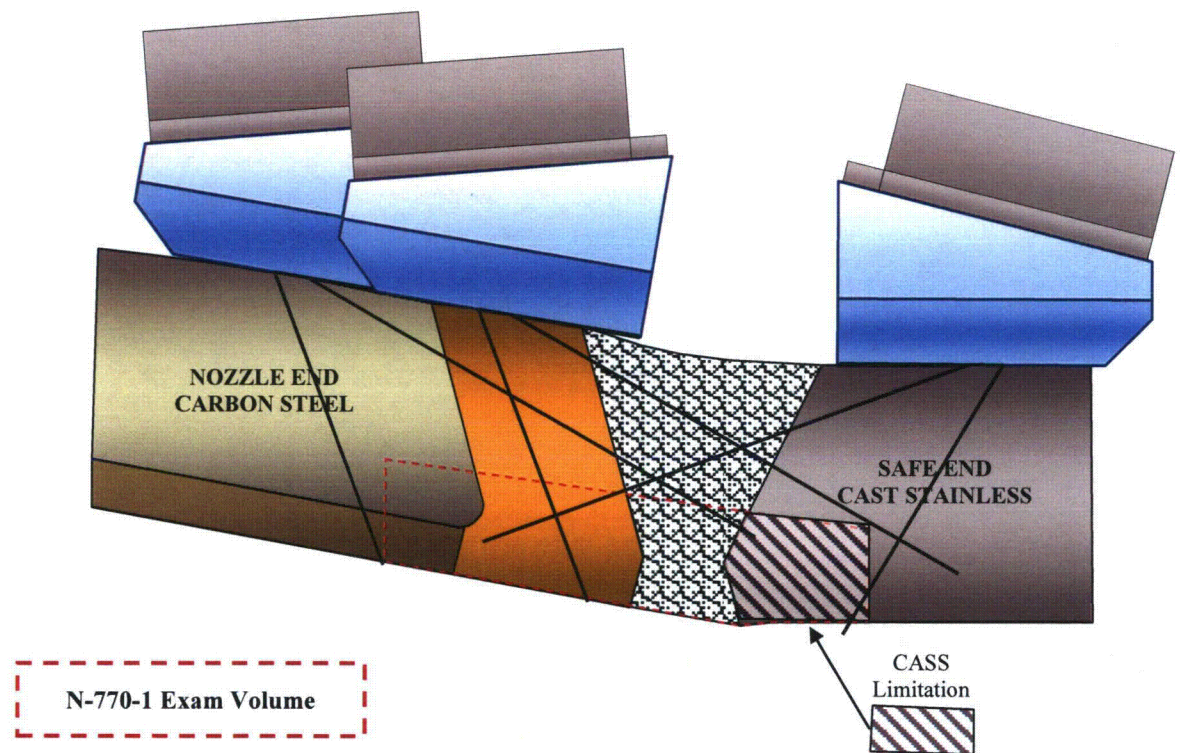
**114350 / 12-SI-1009-16**

Examination coverage limited due to CASS material  
and existing geometric configuration



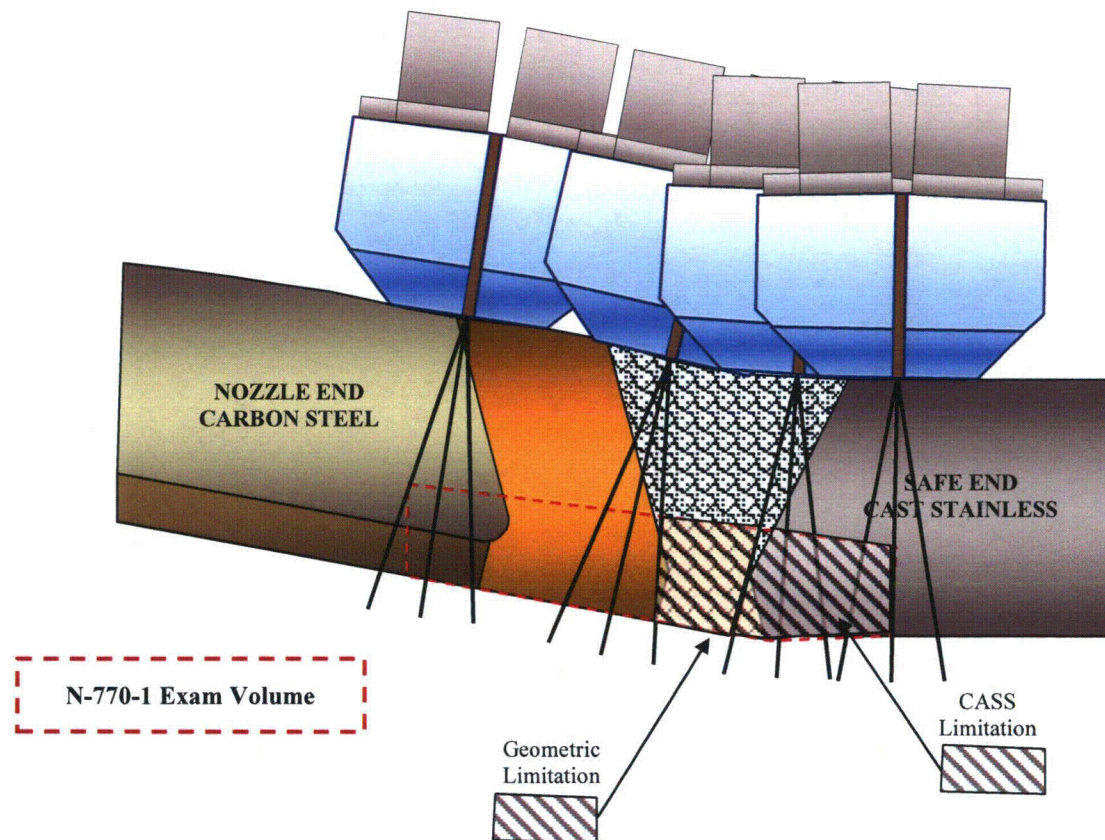
**115200 / 12-SI-1010-14**

**Examination coverage limited due to CASS material**



### 115200 / 12-SI-1010-14

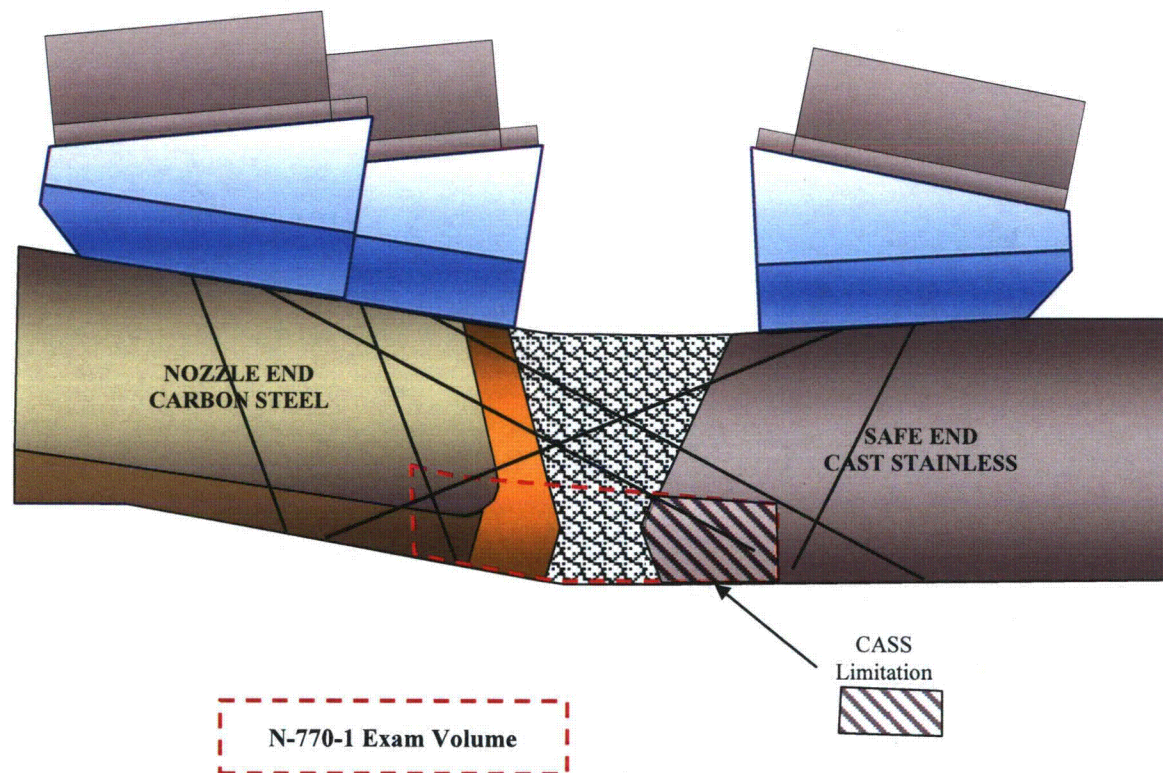
Examination coverage limited due to CASS material  
and existing geometric configuration





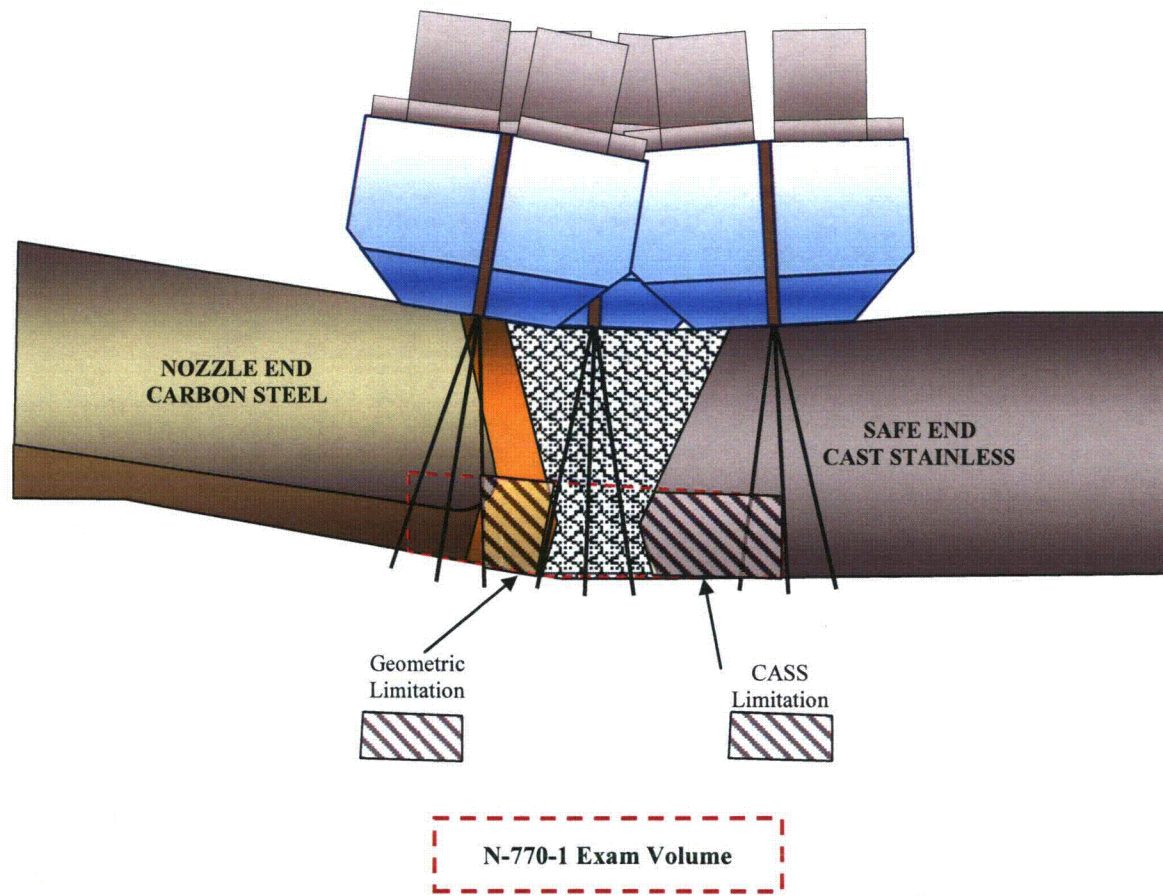
**116000 / 12-SI-1011-13**

**Examination coverage limited due to CASS material**



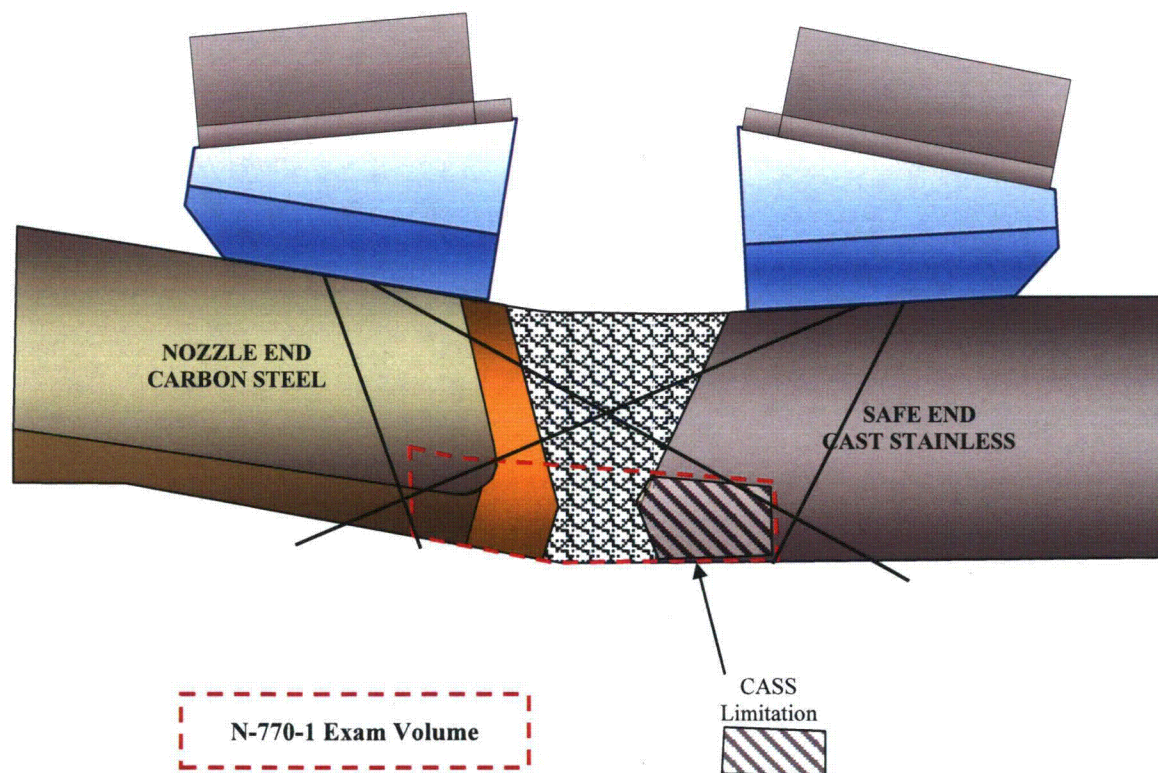
**116000 / 12-SI-1011-13**

**Examination coverage limited due to CASS material  
and existing geometric configuration**



**116750 / 12-SI-1012-13**

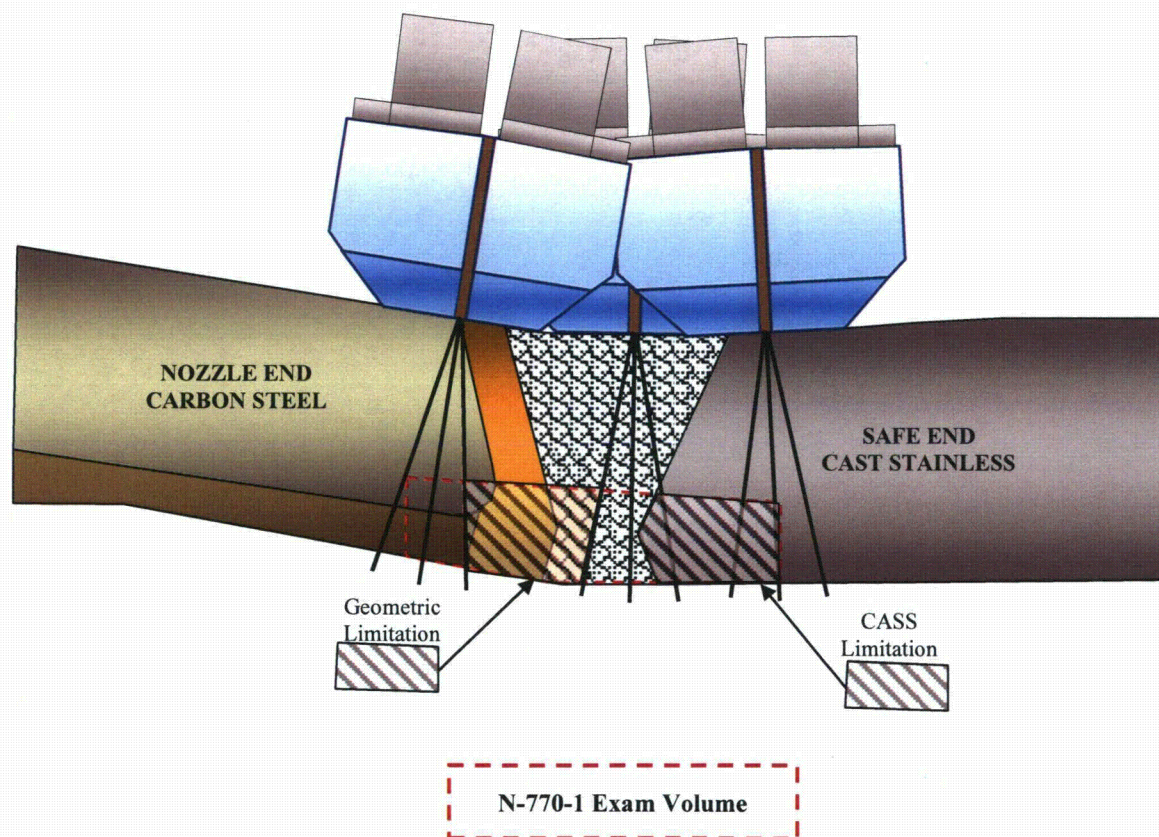
**Examination coverage limited due to CASS material**



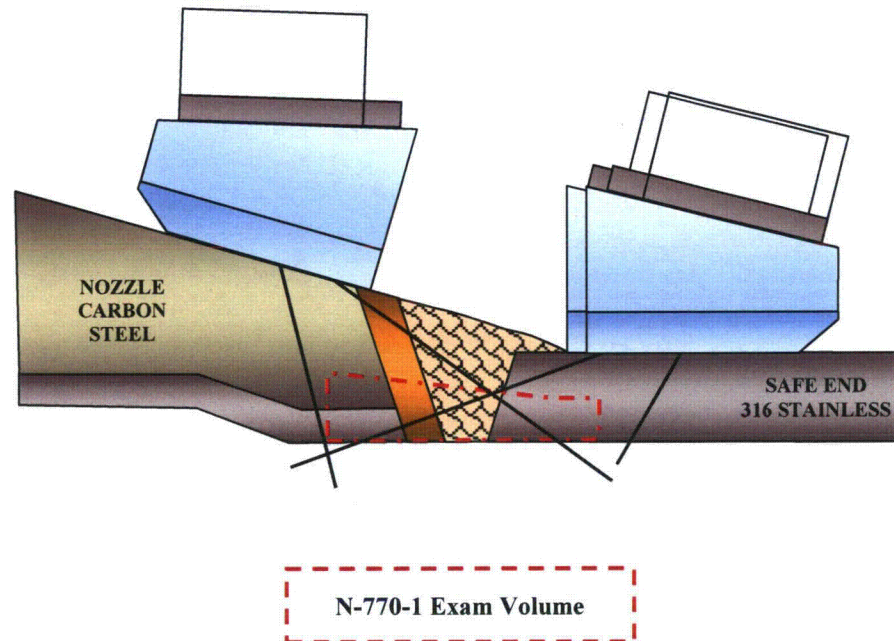


### 116750 / 12-SI-1012-13

Examination coverage limited due to CASS material  
and existing geometric configuration



**118500 / 4-PS-1003-6**





## 118500 / 4-PS-1003-6

Examination coverage limited due to existing geometric configuration

