



LR-N15-0128

JUL 06 2015

United States Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Hope Creek Generating Station  
Renewed Facility Operation License No. NPF-57  
NRC Docket No. 50-354

Subject: Deviation from EPRI document 3002000091 Inspection  
Requirements

Reference: EPRI document 3002000091, Nondestructive Evaluation:  
Guideline for Conducting Ultrasonic Examinations of Dissimilar  
Metal Welds, Revision 1

EPRI (Electric Power Research Institute) document 3002000091, Nondestructive Evaluation: Guideline for Conducting Ultrasonic Examinations (UTs) of Dissimilar Metal Welds, Revision 1 dated May 2013, requires an encoded UT examination. The requirement for Hope Creek to comply with EPRI 3002000091 is based on an industry commitment to follow the guidelines of NEI 03-08 for "needed" requirements. Encoded UT examinations were scheduled to be performed on two dissimilar welds during our recent refueling outage. Completion of the examinations was unsuccessful. This correspondence discusses the deviation from the requirement to perform the examinations.

During Hope Creek's 19th refueling outage (RF19), an attempt was made to perform encoded ultrasonic (UT) examinations of two inter-granular stress corrosion cracking (IGSCC) susceptible Reactor Water Clean-Up (RWCU) welds, 1-BG-6DBA-001-23A and 1-BG-6DBA-001-23B. Hope Creek made a best effort attempt to perform the required encoded UT examinations. However, time and dose constraints hindered the completion of the encoded UT examinations. BWRVIP-75-A requires only performance of the ASME Section XI Appendix VIII, Supplement 10 qualified UT examinations. BWRVIP-75-A does not specify encoded, phased array examination. Both RWCU welds were examined during RF19 using the BWRVIP-75-A required ASME Section XI Appendix VIII Supplement 10 qualified technique. Both examinations achieved 100% coverage. Both examinations included axial and circumferential scanning with multiple angles (45, 60, and 70 degrees). Both examinations reported no

recordable indications. Both examinations were accepted as satisfactory by a PSEG NDE UT Level III individual.

The RF19 examinations were not phased array examinations. However, previous examinations performed on both welds during RF15 were non-encoded phased array examinations. Both RF15 examinations achieved 100% coverage, reported no recordable indications, and were accepted by a PSEG NDE UT Level III as satisfactory.

A technical evaluation of the deviation from EPRI document 3002000091 inspection requirements was performed. The Technical Evaluation concluded that a deviation from the requirements of EPRI document 3002000091 was acceptable for the RF19 examinations performed on the RWCW welds. The RF19 examinations satisfied the requirements of BWRVIP-75-A. The RF19 examinations were performed using a qualified technique, by qualified personnel. No recordable indications existed within 100% of the exam volume. The results of the RF19 examinations were consistent with the results of the RF15 examinations. Both welds were examined in RF15, with no recordable indications noted, by manual phased array UT technique qualified to the requirements of ASME Section XI Appendix VIII, Supplement 10.

This letter is being transmitted for information only and Hope Creek is not requesting any action from the NRC staff.

There are no regulatory commitments contained in this correspondence.

Should you have any questions concerning this letter, please contact Phil Duca at (856) 339-1640.

Respectfully

A handwritten signature in black ink that reads "Paul Davison". The signature is written in a cursive, flowing style.

Paul Davison  
Site Vice President – Hope Creek Generating Station

pjd

Cc: Mr. Daniel H. Dorman, Regional Administrator – Region 1  
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