

# Coverage Relief Request Update

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# 2015 Presentation on Impractical Relief Requests



In 2015 the NRC prepared a presentation that covered issues that commonly resulted in Requests for Additional Information (RAIs)

It can be found in ADAMS under Accession Number ML15013A266



## **What has changed since 2015?**

The quality of impractical relief requests has improved substantially

This improvement has resulted in fewer RAIs, but has not eliminated them

Many RAIs are based on missing information or errors the submittal

Some RAIs are related to issues that makes justifying reasonable assurance of leak tightness and structural integrity more challenging

## Themes in RAIs Since 2015

Welds with low coverage may get extra scrutiny

Some RAIs are in response to operating experience- welds with new issues may get more questions

Some RAIs address inconsistencies in submittals, such as including information on some welds but not others

A review of recent RAIs did not find a strong common issue that resulted in many RAIs

# What Information is Helpful?

Recent examples of RAIs have asked for the following additional information to help provide reasonable assurance in difficult cases:

A summary of the evaluation for accepting the proposed limited coverages required by ASME Code Case N-716 “Alternative Classification and Examination Requirements Section XI”

A discussion of measures that could ensure or monitor the structural integrity of the subject welds, including the reactor coolant system leakage detection systems, routine system leakage tests in accordance with IWA/B-5000 of the ASME Code, Section XI, boric acid monitoring programs, operator walkdowns, and any augmented examinations.

# Discussion



What have we missed?