

IES Utilities Inc. ENGINEERING DEPARTMENT	No. 1211.11 Page 1 of 8	Rev. 0
WELD REFERENCE SYSTEM		

Effective Date: OCT 25 1995

TECHNICAL REVIEW	
Prepared By: <u>Chris Blood</u> Procedure Writer	Date: <u>10/6/95</u>
Reviewed By: <u>[Signature]</u> Independent Reviewer	Date: <u>10/13/95</u>

PROCEDURE APPROVAL	
I am responsible for the technical content of this procedure.	
Approved By: <u>Frank E. [Signature]</u> Procedure Owner	Date: <u>10-9-95</u>



STOP, CHECK  
AND  
THINK

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WELD REFERENCE SYSTEM		

## 1.0 PURPOSE

- (1) The purpose of this procedure is to define the requirements for a weld reference system which shall be established for welds and areas subject to surface and/or volumetric examination.
- (2) This procedure is applicable to examinations performed within the scope of the ASME Section XI Inservice Inspection Implementation Plan.
- (3) This procedure meets the requirements of the ASME Code, Section XI 1980 Edition through and including the Winter 1981 Addenda and Section XI 1989 Edition.

## 2.0 DEFINITIONS

All definitions are contained in the Quality Assurance Manual, Appendix B, "Glossary of Terms".

## 3.0 INSTRUCTIONS

### 3.1 RESPONSIBILITIES

- (1) Nondestructive Examiners (NDE) are responsible for:
  - Establishing and/or verifying the weld reference system in accordance with this procedure.
  - Reporting the results of NDE examinations using the reference system in accordance with this procedure.

### 3.2 REQUIREMENTS

- (1) Each weld and/or areas subject to surface and/or volumetric examination shall be located and identified by a system of reference points. The system shall permit identification of each weld, location of each weld center line, and designation of regular intervals along the length of the weld. This procedure shall replace any contractor's reference system.

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### 3.3 INSTRUCTIONS

#### 3.3.1 EQUIPMENT

- (1) Only low stress metal stamps and/or vibratooling shall be used, when required by this procedure. Marking applied shall not be any deeper than 3/64".
- (2) Only DAEC Engineering-approved markers shall be used, when required by this procedure.

#### 3.3.2 WELD REFERENCE SYSTEM FOR PIPING WELDS

- (1) Weld identification numbers shall be verified correct using isometric and/or FSK drawings.
- (2) If weld identification numbers are not permanently marked or incorrectly marked, then either low stress metal stamps or a vibratool shall be used to identify welds.
- (3) Using a low stress V stamp or vibratool, establish a starting reference point (Lo) by marking the weld. The tip of the V shall be placed on the weld center line and pointed along the center line in the direction of the examination (L). Locate the V mark on the weld using one of rules given in (a) through (h). If more than one rule can be applied, the lowest numbered ruled shall be used.
  - (a) For pipe having a horizontal component of weld, use the top center line of the pipe.
  - (b) If a pipe is vertical (no horizontal component) and the weld is either an elbow-to-Z or Z-to-elbow, where Z is any piping component other than an elbow, use the center line on the outside radius of the elbow.
  - (c) If a pipe is vertical and the weld is pipe-to-pipe, elbow-to-elbow, Z-to-pipe, or pipe-to-Z, where Z is any piping component other than an elbow, use an extension of the center line of the outside radius of the elbow above the weld.

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- (d) If in rule (c) there is no elbow above, use an extension of the center line of the outside radius of the elbow below the weld.
  - (e) If rule (c) or (d) cannot be used because elbows are not visible, choose the most convenient location.
  - (f) For saddle welds (sweeplet, weldolet), use the upstream intersection of the weld with the center line of the saddle weld parallel to the pipe axis (see Attachment 1, Figure 1). Measure the distance L from the starting reference point clockwise as indicated in Figure 1.
  - (g) Zero reference for longitudinal seam welds is the intersection of the longitudinal weld and the circumferential weld associated with the portion of the longitudinal weld being examined. Measure L away from the intersection and parallel to the longitudinal weld (see Attachment 1, Figure 2).
  - (h) For all circumferential welds, the L dimension is measured clockwise when looking in the direction of flow. (See Attachment 1, Figure 3). A pipe-to-tee weld is considered to be a circumferential weld in the branch pipe and rules (a) through (e) apply. (See Figure 4.)
- (4) The layout of the weld shall consist of placing reference points using an approved marker next to the weld as not to interfere with interpretation of the examination results. The standard spacing of the reference points shall be 12" or 90 apart. All points shall be identified with their numbers 0, 1, 2, 3, etc. or 12 o'clock, 3 o'clock, 6 o'clock, and 9 o'clock. The number of points, distance apart, and starting point shall be recorded on the reporting form. The weld center line shall be the divider for the two examination surfaces.

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### 3.4 WELD REFERENCE SYSTEM FOR COMPONENTS OTHER THAN PIPING

- (1) Weld identification numbers shall be verified correct, using isometric and/or FSK drawings.
- (2) If weld identification numbers are not permanently marked or incorrectly marked, then either a low stress metal stamp or a vibratool shall be used to identify welds.
- (3) Using a low stress V stamp or vibratool, establish a starting reference point (Lo) by marking the weld. The tip of the V shall be placed on the weld center line and pointed along the center line in the direction of the examination (L). Locate the V mark on the weld using the applicable rules in (a) through (c). Lay out the examination area using rule 3.3.1(4).

#### (a) Circumferential (Girth) Welds

The standard starting point shall be component 0 degree. The reference points shall be numbered clockwise as viewed from the top of the component. The examination surfaces shall be identified as above or below the weld.

#### (b) Longitudinal (Vertical) Welds

Longitudinal welds shall be laid out from the center line of circumferential welds at the top end of the weld. The examination surface shall be identified as clockwise or counterclockwise as viewed from the top of the component.

#### (c) Nozzle-to-Vessel Welds

The external reference circle shall have a sufficient whole number of inches radius so that the circle falls on vessel external surface beyond the weld fillet. The internal reference circle shall have a sufficient whole number of inches radius so that the circle falls within 1/2 inch of the weld center line. Zero degree point on the weld shall be the top of the nozzle. The 0 degree point for welds of nozzles centered in heads shall be

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located at the 0 degree axis of the vessel. Angular layout of the weld shall be made clockwise on the external surface, counterclockwise on the internal surface. Zero, 90, 180, and 270 degree lines shall be marked on all nozzle welds examined; 30 degree increment lines shall be marked on nozzle welds greater than 4 inch radius; 15 degree increment lines shall be marked on nozzle welds greater than 12 inch radius; 5 degree increment lines shall be marked on nozzle welds greater than 24 inch radius.

#### 5.0 RECORDS

No records are generated by this procedure.

#### 6.0 REFERENCES

- (1) ASME Section XI 1980 Edition through and including the 1981 Addenda
- (2) ASME Section XI 1989 Edition

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ATTACHMENT 1  
 FIGURES 1 AND 2

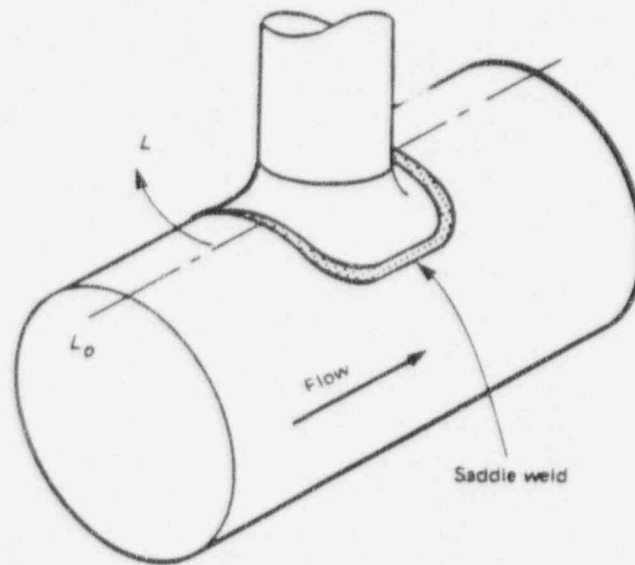


FIGURE 1

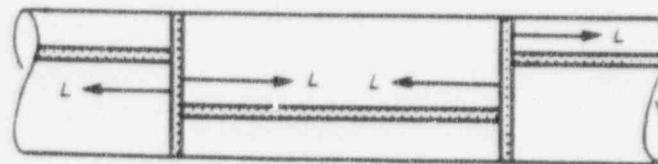


FIGURE 2

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ATTACHMENT 2  
FIGURES 3 AND 4

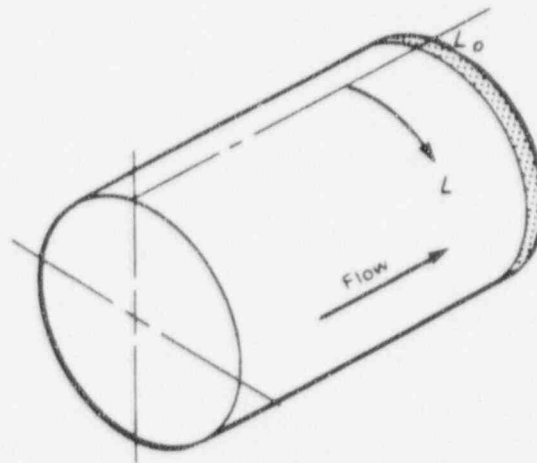


FIGURE 3

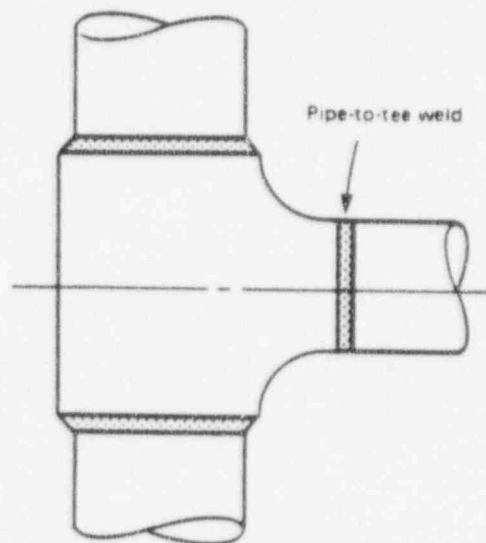


FIGURE 4



**RELIEF REQUEST NUMBER: NDE-R022**  
(Page 1 of 2)

**COMPONENT IDENTIFICATION**

Code Class: 1  
References: IWB-2500  
Table IWB-2500-1  
  
Examination Category: B-A  
Item Number: B1.30  
Description: Shell to Flange Welds  
  
Component Numbers: VCB-C005, Reactor Vessel Shell to Flange Weld

**CODE REQUIREMENT**

Section XI (1989 Edition), Table IWB-2500-1 Category B-A, Item B1.30, requires a volumetric examination, which includes essentially 100% of weld length once during the ten year interval.

Note 4 of Table IWB-2500-1 states "The examination of shell-to-flange welds may be performed during the first and third inspection periods in conjunction with the nozzle examinations of Exam. Cat. B-D (Program B). At least 50% of shell-to-flange welds shall be examined by the end of the first inspection period, and the remainder by the end of the third inspection period.

Relief is requested from performing 50% of the weld length during the first inspection period for the subject Reactor Vessel Shell-to-Flange Weld.

**BASIS FOR RELIEF**

NUREG 0619, 4.3.1 states in part "Should future developments and the results of inservice UT examinations demonstrate that UT techniques can detect small nozzle thermal fatigue cracks with acceptable reliability and consistency these techniques could then form the basis for modification of the inspection criteria that follow." The DAEC has performed this demonstration and plans on performing the UT examination of our feedwater nozzles during RFO 14. In order to save exposure and manpower, all third period, second 10 year interval vessel examinations were deferred to RFO 14 (1996). This included the remaining 30% (252° to 0°) of the subject shell-to-flange weld which is needed to complete the required examination for the 2nd Ten Year Interval. The DAEC will be scheduling the first period examinations required for the Third Ten Year Interval during RFO 14 to reduce exposure and manpower and to utilize the specialized examination equipment needed to perform the NUREG 0619 feedwater examinations.

**RELIEF REQUEST NUMBER: NDE-R022**

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**BASIS FOR RELIEF (Cont.)**

In order to meet the requirements for the Third Ten Year Interval, an additional 50% of the weld VCB-C005 would be required to be examined in RFO 14. The total amount of the weld VCB-C005 examined in RFO 14 would be approximately 80%, thus exceeding the intent of the code by 30% in one period even though the extra 30% is being examined to complete the prior interval requirements. The DAEC proposes to examine a total of 60% of VCB-C005 during RFO 14 (30% to complete the 2nd Ten Year Interval requirements and 30% to be credited to the Third Ten Year Interval). The area that will be examined is 252° to 108°, equaling 60% of the total length of weld. The remaining 70% to meet the third 10 year interval requirement (108° - 0°) will be examined during the third period of the 3rd Ten Year Interval. To perform a total of 80% during RFO 14 has a small potential of increasing plant safety margins and a very disproportionate impact on expenditures of plant manpower and radiation exposure. In order to maintain the successive examination requirement (ref. IWB-2420) the area examined during RFO 14 (first period of the Third Ten Year Interval) will be examined during the first period of the Fourth Ten Year Interval. The following table shows the past and proposed future examinations of VCB-C005:

	<u>1st Interval</u>	<u>2nd Interval</u>	<u>3rd Interval</u>	<u>4th Interval</u>
Period 1	108° - 252°	0° - 108°	0° - 108°	0° - 108°
Period 2	0° - 108°	108° - 252°		
Period 3	252° - 0°	252° - 0°	108° - 0°	108° - 0°

**ALTERNATE EXAMINATION**

DAEC will examine a total of 60% of the shell-to-flange weld (VCB-C005) during RFO 14 with 30% being credited to the 2nd Ten Year Interval and 30% being credited to the Third Ten Year Interval. The area examined for credit for the Third Ten Year Interval will be scheduled for the first period of the 4th Ten Year Interval in order to meet the successive examination requirement under IWB-2420.

**APPLICABLE TIME PERIOD**

Relief is requested for the third ten-year interval of the Inservice Inspection Program for DAEC.

**RELIEF REQUEST NUMBER: NDE-R024**

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**COMPONENT IDENTIFICATION**

Code Class: 1, 2, and 3

References: IWA-2430(d)

Examination Category: Not Applicable

Item Number: Not Applicable

Description: Scheduling of Inservice Inspections for Components inspected under Program B.

**CODE REQUIREMENT**

IWA-2430(d) states "For components inspected under Program B, each of the inspection intervals may be extended or decreased by as much as 1 year. Adjustments shall not cause successive intervals to be altered by more than 1 year from the original pattern of intervals."

IWB-2500-1, Cat. B-A, Note 4 states "The examination of shell-to-flange welds may be performed during the first and third inspection periods in conjunction with the nozzle examinations of Exam. Cat. B-D (Program B). At least 50% of shell-to-flange welds shall be examined by the end of the first inspection period, and the remainder by the end of the third inspection period."

IWB-2500-1, Cat. B-D, Note 2 states "At least 25% but not more than 50% (credited) of the nozzles shall be examined by the end of the first inspection period, and the remainder by the end of the inspection interval."

**BASIS FOR RELIEF**

NUREG 0619, 4.3.1 states in part "Should future developments and the results of inservice UT examinations demonstrate that UT techniques can detect small nozzle thermal fatigue cracks with acceptable reliability and consistency these techniques could then form the basis for modification of the inspection criteria that follow." The DAEC has performed this demonstration and plans on performing the UT examination of our feedwater nozzles during RFO 14. In order to save exposure and manpower, all third period, second 10 year interval vessel examinations were deferred to RFO 14 (1996). The DAEC has also scheduled the first period examinations required for the Third Ten Year Interval during RFO 14 to reduce exposure and manpower and to utilize the specialized examination equipment needed to perform the NUREG 0619 feedwater examinations.

**RELIEF REQUEST NUMBER: NDE-R024**

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**ALTERNATE EXAMINATION**

In order to meet the requirements of the two notes above, 60% of the vessel-to-flange weld (VCB-C005) (Ref Relief Request NDE-R022) and a total of 13 nozzle-to-vessel welds with the associated inner radius (38% of 34 total nozzles) (Ref. Relief Request NDE-R025) have been scheduled to be completed in RFO 14. The DAEC has also scheduled an additional 8 nozzle-to-safeend welds (Ref. Relief Request NDE-R026) to be credited to the Third Ten Year Interval during RFO 14.

The DAEC will perform the necessary examinations per Table IWB-2500-1 Cat B-A, Note 4 and Cat. B-D, Note 2 during RFO 14. The DAEC RFO 14 encompasses both the Third Period of the Second Ten Year Interval and the First Period of the Third Ten Year Interval. This approach has been accepted by Code Case N-535 as long as the examinations performed are not credited to both intervals. The additional examinations performed in RFO 14 will not be credited to both intervals and the Summary Report shall identify the interval in which the examinations will be credited.

The DAEC plans on utilizing Code Case N-535 for future outages and will follow the requirements specified in the code case.

**APPLICABLE TIME PERIOD**

Relief is requested for the third ten-year interval of the Inservice Inspection Program for DAEC.

**RELIEF REQUEST NUMBER: NDE-R025**

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**COMPONENT IDENTIFICATION**

Code Class: 1  
References: IWB-2500  
Table IWB-2500-1  
Examination Category: B-D  
Item Number: B3.90 and B3.100  
Description: Nozzle to Vessel Welds and Nozzle Inner Radius Sections  
Component Numbers: MSA-D001, FWA-D001, CSA-D001, CSB-D001, CRA-D001,  
RHA-D001, RRF-D001, RRH-D001, RCB-D001, RRD-D001,  
HVA-D001, JPA-D001, VIE-D001

**CODE REQUIREMENT**

Section XI (1989 Edition), Table IWB-2500-1 Category B-D, Item B3.90, requires a volumetric examination, which includes essentially 100% of weld length once during the ten year interval.

IWB-2500-1, Cat. B-D, Note 2 states "At least 25% but not more than 50% (credited) of the nozzles shall be examined by the end of the first inspection period, and the remainder by the end of the inspection interval."

Note 2 above does not apply to the Nozzle Inner Radius Sections however, this was added to Item Number B3.100 in the 1994 Addenda of ASME Section XI.

**BASIS FOR RELIEF**

NUREG 0619, 4.3.1 states in part "Should future developments and the results of inservice UT examinations demonstrate that UT techniques can detect small nozzle thermal fatigue cracks with acceptable reliability and consistency these techniques could then form the basis for modification of the inspection criteria that follow." The DAEC has performed this demonstration and plans on performing the UT examination of our feedwater nozzles during RFO 14. In order to save exposure and manpower, all third period, second 10 year interval vessel examinations were deferred to RFO 14 (1996). The DAEC has also scheduled the first period examinations required for the Third Ten Year Interval during RFO 14 to reduce exposure and manpower and to utilize the specialized examination equipment needed to perform the NUREG 0619 feedwater examinations. In order to meet the requirements of the note above, the nozzles listed above have been scheduled to be completed in RFO 14. The DAEC has also scheduled the associated inner radius sections with the nozzle to vessel weld examinations in RFO 14.

**RELIEF REQUEST NUMBER: NDE-R025**

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**BASIS FOR RELIEF (Cont.)**

The following table provides the sequence of examinations for the 2nd and 3rd ten year intervals for the nozzle to vessel welds.

Nozzle	2nd Ten Year Interval	3rd Ten Year Interval	Comments
CRA-D001	2ND PERIOD	1ST PERIOD	
CSA-D001	1ST PERIOD	1ST PERIOD	
CSB-D001	1ST PERIOD	1ST PERIOD	
FWA-D001	1ST PERIOD	1ST PERIOD	
FWB-D001	3RD PERIOD	3RD PERIOD	
FWC-D001	3RD PERIOD	3RD PERIOD	
FWD-D001	3RD PERIOD	3RD PERIOD	
HDA-D001			EXEMPT
HSB-D001	2ND PERIOD	3RD PERIOD	
HVA-D001	1ST PERIOD	1ST PERIOD	
JPA-D001	2ND PERIOD	1ST PERIOD	
JPB-D001	3RD PERIOD	3RD PERIOD	
LCA-D001	3RD PERIOD	3RD PERIOD	
MSA-D001	1ST PERIOD	1ST PERIOD	
MSB-D001	2ND PERIOD	3RD PERIOD	
MSC-D001	3RD PERIOD	3RD PERIOD	
MSD-D001	3RD PERIOD	3RD PERIOD	
RCA-D001	2ND PERIOD	3RD PERIOD	
RCB-D001	1ST PERIOD	1ST PERIOD	
RHA-D001	1ST PERIOD	1ST PERIOD	
RRA-D001	1ST PERIOD	3RD PERIOD	
RRB-D001	1ST PERIOD	3RD PERIOD	
RRC-D001	1ST PERIOD	3RD PERIOD	
RRD-D001	1ST PERIOD	1ST PERIOD	
RRE-D001	1ST PERIOD	3RD PERIOD	
RRF-D001	2ND PERIOD	1ST PERIOD	
RRG-D001	3RD PERIOD	3RD PERIOD	
RRH-D001	1ST PERIOD	1ST PERIOD	
VIA-D001	2ND PERIOD	3RD PERIOD	
VIB-D001	3RD PERIOD	3RD PERIOD	
VIC-D001	2ND PERIOD	3RD PERIOD	
VID-D001	2ND PERIOD	3RD PERIOD	
VIE-D001	1ST PERIOD	1ST PERIOD	
VIF-D001	2ND PERIOD	3RD PERIOD	

**RELIEF REQUEST NUMBER: NDE-R025**

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**ALTERNATE EXAMINATION**

The DAEC RFO 14 encompasses both the Third Period of the Second Ten Year Interval and the First Period of the Third Ten Year Interval. This approach has been accepted by Code Case N-535 as long as the examinations performed are not credited to both intervals. The additional nozzle to vessel weld examinations performed in RFO 14 will not be credited to both intervals and the Summary Report shall identify the interval in which the examinations will be credited.

Performing examination of the Nozzle Inner Radius Sections during the same refueling outage as the nozzle to vessel weld examinations reduces manpower and exposure to the craft and examination personnel by not requiring the removal of bioshields, insulation, etc. during different outages. The Code Committee has recognized this and added to Item B3.100 reference to Note 2 in the 1994 Addenda.

**APPLICABLE TIME PERIOD**

Relief is requested for the third ten-year interval of the Inservice Inspection Program for DAEC.



**RELIEF REQUEST NUMBER: NDE-R026**

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**COMPONENT IDENTIFICATION**

Code Class: 1

References: IWB-2500

Table IWB-2500-1

Examination Category: B-F

Item Number: B5.10

Description: Nozzle to Safeend Welds

Component Numbers: CSA-F002, CSB-F002, JPA-F002, JPB-F002, RCA-F002, RCB-F002, RRA-F002, RRB-F002, RRC-F002, RRD-F002, RRE-F002, RRF-F002, RRG-F002, RRH-F002

**CODE REQUIREMENT**

Section XI (1989 Edition), Table IWB-2500-1 Category B-F, Item B5.10, requires a volumetric examination, which includes essentially 100% of weld length once during the ten year interval.

IWB-2500-1, Cat. B-F, Note 2 states "For the reactor vessel nozzle safe ends, the examinations may be performed coincident with the vessel nozzle examinations required by Examination Category B-D.

**BASIS FOR RELIEF**

NUREG 0619, 4.3.1 states in part "Should future developments and the results of inservice UT examinations demonstrate that UT techniques can detect small nozzle thermal fatigue cracks with acceptable reliability and consistency these techniques could then form the basis for modification of the inspection criteria that follow." The DAEC has performed this demonstration and plans on performing the UT examination of our feedwater nozzles during RFO 14. In order to save exposure and manpower, all third period, second 10 year interval vessel examinations were deferred to RFO 14 (1996). The DAEC has also scheduled the first period examinations required for the Third Ten Year Interval during RFO 14 to reduce exposure and manpower and to utilize the specialized examination equipment needed to perform the NUREG 0619 feedwater examinations. In order to meet the requirements of the note above, \*eight of the nozzle to safeend welds listed above have been scheduled to be completed in RFO 14.

\*Two of the nozzle to safeend welds (CRA-F002, VIE-F002) scheduled are in Item B5.20 and do not apply to the above note.



**RELIEF REQUEST NUMBER: NDE-R026**

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**BASIS FOR RELIEF (Cont.)**

The following table provides the sequence of examinations for the 2nd and 3rd ten year intervals for the nozzle to safeend welds.

Nozzle to Safeend	2nd Ten Year Interval	3rd Ten Year Interval	*Comments
CSA-F002	1ST PERIOD	1ST PERIOD	3rd period
CSB-F002	3RD PERIOD	3RD PERIOD	3rd period
JPA-F002	2ND PERIOD	1ST PERIOD	3rd period
JPB-F002	3RD PERIOD	3RD PERIOD	3rd period
RCA-F002	2ND PERIOD	3RD PERIOD	2nd period
RCB-F002	3RD PERIOD	1ST PERIOD	3rd period
RRA-F002	1ST PERIOD	3RD PERIOD	2nd period
RRB-F002	1ST PERIOD	3RD PERIOD	2nd period
RRC-F002	2ND PERIOD	3RD PERIOD	3rd period
RRD-F002	3RD PERIOD	1ST PERIOD	3rd period
RRE-F002	1ST PERIOD	3RD PERIOD	2nd period
RRF-F002	2ND PERIOD	1ST PERIOD	3rd period
RRG-F002	3RD PERIOD	3RD PERIOD	3rd period
RRH-F002	3RD PERIOD	1ST PERIOD	3rd period

\* All of these nozzle to safeend welds are examined in accordance with the DAEC GL 88-01 Program in addition to the DAEC ISI Program.

**ALTERNATE EXAMINATION**

The DAEC RFO 14 encompasses both the Third Period of the Second Ten Year Interval and the First Period of the Third Ten Year Interval. This approach has been accepted by Code Case N-535 as long as the examinations performed are not credited to both intervals. The additional nozzle to safeend weld examinations performed in RFO 14 will not be credited to both intervals and the Summary Report shall identify the interval in which the examinations will be credited. Performing examination of the nozzle to safeend welds during the same refueling outage as the nozzle to vessel weld examinations reduces manpower and exposure to the craft and examination personnel by not requiring the removal of bioshields, insulation, etc. during different outages.

**APPLICABLE TIME PERIOD**

Relief is requested for the third ten-year interval of the Inservice Inspection Program for DAEC.

**TECHNICAL APPROACH AND POSITION NUMBER: TAP-P001**

(NDE-09)  
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**COMPONENT IDENTIFICATION**

Code Classes: i

References: IWA-5221  
IWA-5224

Examination Categories: B-P

Item Number: B15.10, B15.11, B15.40, B15.41, B15.50, B15.51, B15.60,  
B15.61, B15.70, B15.71

Description: All ASME Class 1 Pressure Retaining Components within the  
Drywell containment areas

**CODE REQUIREMENT**

ASME Section XI requires that all Class 1 pressure retaining components be pressurized and visual (VT-2) examined in accordance with;

- 1) IWA-5211(a) system leakage test following the opening and reclosing of a component in the Class 1 system.
- 2) IWA-5211(b) system hydrostatic test conducted during a plant shutdown at a pressure above nominal operating pressure or system pressure for which overpressure protection is provided.
- 3) IWA-5212(c) The system test conditions shall be maintained essentially constant during the course of the visual examination.

Hydrostatic test boundaries (IWA-5224) shall be defined by system boundaries in which the components have the same code classifications and are designed to the same pressure rating.

**BASIS FOR POSITION**

DAEC's position is that regardless of the type of pressure test performed (i.e. Operational or Hydrostatic), the Class 1 pressurization boundary which extends into the Drywell containment areas is hazardous for inspection (VT-2) personnel due to radiation exposure and the extremely confined proximity to pressurized components.

**TECHNICAL APPROACH AND POSITION NUMBER: TAP-P001**

(NDE-09)

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The IES Safety Manual prohibits Drywell entry, except for emergency, above 400 psig. Therefore, visual (VT-2) examinations shall be conducted after the pressure holding period of IWA-5213 is satisfied, and the pressure is lowered to a level (<400 psig). The corresponding temperature will be in accordance with plant Technical Specification heatup and cooldown rate established by fracture prevention criteria. Additionally, small leaks not identified visually during the proposed inspection would be identified by radiation, temperature detection systems and plant leakage detection systems which conform to position "C" of Reg. Guide 1.45, "Reactor Coolant Pressure Boundary Leakage Detection Systems." The increased radiation exposure and exposure to pressurized system hazards during the Code required inspection would be a burden on the licensee without increased personnel's ability to identify leaks in the drywell area.

**PROPOSED ALTERNATE PROVISIONS**

DAEC Safety Manual prohibits Drywell entry, except for emergency, above 400 psig. Therefore, visual (VT-2) examinations shall be conducted after the pressure holding period of IWA-5213 is satisfied, and the pressure is lowered to a level (<400 psig) and a temperature in accordance with plant Technical Specification heatup and cooldown rate established by fracture prevention criteria. This proposed alternative VT-2 examination will **only** be performed during NON-REFUELING OUTAGES when disassembly and reassembly of a limited number of mechanical joints are involved.

**APPLICABLE TIME PERIOD**

For the DAEC third Interval Inservice Inspection program, a system pressure test in accordance with IWA-5000 and IWA-5245 will be performed.