

# BWR OWNERS' GROUP

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BWROG-99024

March 5, 1999

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

**SUBJECT:** BWR Owners' Group Program on Weld Overlay Inspection Relief  
**BWROG Project Number 691**

**ENCLOSURE:** "Technical Justification for the Extension of the Interval between Inspections of Weld Overlay Repairs," EPRI Report TR-110172, February, 1999.

Letter from Arthur Kenny (EPRI Intellectual Property Attorney) to U.S. NRC Document Control Desk, dated February 17, 1999, and accompanying affidavit.

**ATTENTION:** Michael J. Davis

Attached please find EPRI Report TR-110172, "Technical Justification for the Extension of the Interval between Inspections of Weld Overlay Repairs." This Report provides the technical basis for the BWR Owners' Group Program on Weld Overlay Inspection Relief.

Currently, utilities inspect weld overlays at a frequency in accordance with NUREG - 0313, Category E (e.g., 100% every two outages). Since the weld overlay inspections generally take place in high radiation areas surrounding the reactor recirculation system, utilities incur high costs and significant exposure when performing these inspections. Total radiation exposure for each inspection can easily exceed 1 person-rem per weld. Therefore, reduction in the required frequency of these inspections can have a major impact in total exposure at these plants. This report reviewed the inspection results of 236 weld overlays, 133 of which were inspected at least three times since installation. None of these inspections identified any degradation of the design margins of the weld overlay repairs, due either to IGSCC propagation into the weld overlay or any other mechanism.

Based on the above, the BWROG requests review of the attached EPRI Report and approval to increase the inspection interval. For BWRs with hydrogen water chemistry, these Category E weld overlays should be reclassified to Category A (25% every 10

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years) when the overlay has received at least three satisfactory post pre-service inspections. For plants operating with normal water chemistry, these Category E weld overlays should be reclassified to Category B (50% every 10 years) when the overlay has received at least three satisfactory post pre-service inspections. The attached EPRI Report provides a detailed technical justification for increasing these inspection intervals.

Please note that the attached Report has been designated "EPRI Proprietary Licensed Material." Based on the attached affidavit, EPRI is requesting that this document be withheld from public disclosure.

While this report has been endorsed by a substantial number of the members of the BWROG, it should not be interpreted as a commitment of any individual member to a specific course of action. Each member must formally endorse the BWROG position in order for that position to become the member's position.

The BWROG would be pleased to meet with the NRC to discuss any aspect of the attached report. If you have any questions, please contact the undersigned or Robert Penny (NYPA), Chairman of the BWROG Weld Overlay Inspection Relief Committee (914) 681-6288.

Regards,

*Original Signed by*

W. Glenn Warren, Chairman,  
BWR Owners' Group

cc: JM Kenny, BWROG Vice Chairman  
BWROG Primary Representatives  
BWROG Weld Overlay Inspection Relief Committee  
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