



**Entergy Nuclear Northeast**  
Entergy Nuclear Operations, Inc.  
440 Hamilton Avenue  
White Plains, NY 10601  
Tel 914 272 3200  
Fax 914 272 3205

**Michael R. Kansler**  
President

August 11, 2003  
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NL-03-130  
ENO 1.2.03.091  
BVY 03-63

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Stop O-P1-17  
Washington, DC 20555-0001

**SUBJECT:** James A. FitzPatrick Nuclear Power Plant  
Docket No. 50-333  
Indian Point Nuclear Generating Units No. 2 and No. 3  
Docket No. 50-247, and 50-286  
Pilgrim Nuclear Power Station  
Docket No. 50-293  
Vermont Yankee Nuclear Power Station  
Docket No. 50-271  
**Relief Request to Use ASME Code Case N-600**

**References:** 1. USNRC letter from L. Raghavan to F. Cayia, dated March 21, 2003 regarding "Point Beach Nuclear Plant, Units 1 and 2 – Relief Request No. 9 Associated with the 10-Year Interval Inservice Inspection Program (TAC NOS. MB5403 and MB5404)"

Dear Sir:

Pursuant to 10CFR50.55a(a)(3)(i), Entergy (ENO) hereby requests the Nuclear Regulatory Commission (NRC) to approve the use of an alternative to the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI (Subsection IWA) regarding the welder qualification requirements.

Enclosed are five (5) requests for relief to use ASME Code Case N-600 for James A. FitzPatrick Nuclear Power Plant (JAF, Attachment 1), Indian Point Nuclear Generating Unit No. 2 (IP2, Attachment 2), Indian Point Nuclear Generating Unit No. 3 (IP3, Attachment 3), Pilgrim Nuclear Power Station (Attachment 4), and Vermont Yankee Nuclear Power Station (VY, Attachment 5). The proposed alternative would allow the Entergy plants the flexibility to utilize welders qualified by other licensees under similar qualification programs.

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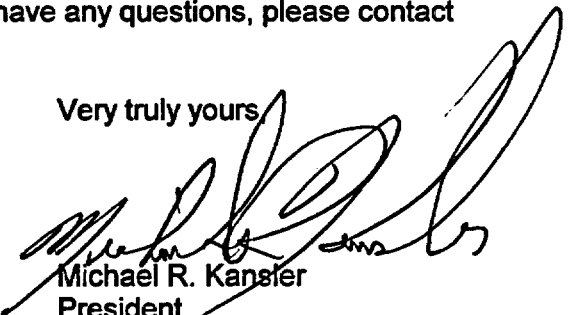
Please note that the requests for relief for JAF, IP2, IP3, and Pilgrim are for their 3<sup>rd</sup> ISI Interval, and the applicable code of record is the 1989 Edition, No Addenda of the ASME Section XI Code. For Vermont Yankee, the request for relief is for the 4<sup>th</sup> ISI Interval, which begins on September 1, 2003, and the applicable code of record is the 1998 Edition, 2000 Addenda of the ASME Section XI Code.

Approval is requested by February 28, 2004 to support the JAF and IP2 Fall 2004 outages. Due to the similarity of these requests for relief, it is also requested that approval for IP3, Pilgrim and VY be granted at the same time.

A similar request for relief was approved for Point Beach Nuclear Plant, Units 1 and 2 (Reference 1).

There are no new commitments made in this letter. If you have any questions, please contact Ms. Charlene Faison at 914-272-3378.

Very truly yours



Michael R. Kansler  
President  
Entergy Nuclear Operations, Inc.

**List of Attachments:**

1. James A. FitzPatrick Nuclear Power Plant, RR-32
2. Indian Point Generating Station Unit No. 2, RR-64
3. Indian Point Generating Station Unit No. 3, RR 3-33 (A)
4. Pilgrim Nuclear Power Station, PRR-33
5. Vermont Yankee Nuclear Power Station, Relief Request No. ISI-012
6. ASME Code Case N-600 (for information)

**cc:**

Mr. Hubert J. Miller  
Regional Administrator, Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406-1415

Mr. Guy S. Vissing, Project Manager  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Mail Stop 8-C2  
Washington, DC 20555-0001

Mr. Patrick D. Milano, Sr. Project Manager  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Mail Stop 0-8-C2  
Washington, DC 20555-0001

Mr. John L. Minns, Project Manager License  
Project Directorate IV-1  
Division of Licensing Project Management  
U.S. Nuclear Regulatory Commission  
Mail Stop 7-D-1  
Washington, DC 20555-0001

**Mr. Travis Tate, Project Manager License  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Mail Stop 7-D-1  
Washington, DC 20555-0001**

**Mr. Robert M. Pulsifer, Project Manager  
License Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Mail Stop 08-B-1  
Washington, DC 20555-0001**

**Resident Inspector's Office  
Indian Point Unit 3  
U.S. Nuclear Regulatory Commission  
P.O. Box 337  
Buchanan, NY 10511-0337**

**Senior Resident Inspector's Office  
Indian Point Unit 2  
U.S. Nuclear Regulatory Commission  
P.O. Box 38  
Buchanan, NY 10511-0038**

**Resident Inspector's Office  
James A. FitzPatrick  
U.S. Nuclear Regulatory Commission  
P.O. Box 136  
Lycoming, NY 13093-0136**

**Senior Resident Inspector  
Pilgrim Nuclear Power Station  
U.S. Nuclear Regulatory Commission  
600 Rocky Hill Road  
Mail Stop 66  
Plymouth, MA 02360**

**USNRC Resident Inspector  
Vermont Yankee Nuclear Power Station  
320 Governor Hunt Road  
P.O. Box 157  
Vernon, VT 05354**

**Mr. Paul Eddy  
New York State Department  
of Public Service  
3 Empire State Plaza  
Albany, NY 12223**

**Mr. Peter R. Smith, Acting President  
New York State Energy, Research, and  
Development Authority  
Corporate Plaza West  
286 Washington Avenue Extension  
Albany, NY 12203-6399**

**Mr. David O'Brien  
Commissioner  
Department of Public Service  
112 State Street, Drawer 20  
Montpelier, VT 05620-2601**

**JAMES A. FITZPATRICK  
THIRD INSERVICE INSPECTION INTERVAL  
RELIEF REQUEST RR-32, Rev. 0**

**A. COMPONENT IDENTIFICATION:**

Class: All  
Identification of System: All

**B. CODE REQUIREMENTS:**

Article IWA-4400(b) - All welders shall be qualified by the repair organization in accordance with the requirements of the codes specified in the Repair Program in accordance with IWA-4120.

**C. RELIEF REQUEST:**

Relief is requested from the requirements of ASME Section XI, Article IWA-4400(b).

**D. BASIS FOR RELIEF:**

The basis for this relief is to implement the alternative requirements of ASME Code Case N-600 for the performance qualification testing of welders, welding operators, brazers, and brazing operators. Code Case N-600 proposes an alternative that would allow the transfer of performance qualifications between Owners, thereby eliminating redundant performance qualifications between facilities. This proposed alternative provides an acceptable level of quality and safety pursuant to 10 CFR 50.55a(a)(3)(i).

A similar request for relief was approved for Point Beach Nuclear Plant, Units 1 and 2 (TAC NOS. MB5403 and MB5404, dated March 21, 2003).

**E. ALTERNATIVE EXAMINATIONS OR TESTS:**

The following alternative testing requirements will be implemented as defined by ASME Section XI Code Case N-600, Transfer of Welder, Welding Operator, Brazer, and Brazing Operator Qualifications Between Owners, Section XI, Division 1.

1. Entergy will perform a technical review of the supplying Owner's records of Welder Performance Qualification (WPQ), Welding Operator Performance Qualification (WOPQ), or Brazer/Brazing Operator Performance Qualification (BPQ).
2. The supplying Owner will state in writing that the WPQ, WOPQ, or BPQ was performed under an acceptable Nuclear Quality Assurance program that meets ASME Section XI, IWA-1400, and that the tests were performed in accordance with ASME Section IX.
3. Entergy will obtain any necessary supporting information to satisfy the requirements of ASME Section IX, QW-301.4 or QB-301.4.

**JAMES A. FITZPATRICK  
THIRD INSERVICE INSPECTION INTERVAL  
RELIEF REQUEST RR-32, Rev. 0**

4. Entergy will require each welder, welding operator, brazer, or brazing operator to demonstrate proficiency by completing a renewal qualification test in accordance with ASME Section IX, QW-322.2(a) or QB-322(b), as applicable, with the following additional requirements.
  - a. When the WPQ transfer involves prior groove tests, the renewal test shall use a groove configuration.
  - b. When the WPQ transfer involves prior fillet tests, the renewal tests may use either a groove or a fillet configuration.
5. Entergy will accept the responsibility for the Performance Qualification Test(s), and will document this acceptance on the renewal test record(s) for the WPQ/WOPQ/BPQ. The renewal test record(s) will reference the original WPQ/WOPQ/BPQ test record(s) supplied by the Owner that provided the qualification.
6. Entergy will accept the responsibility for compliance with ASME Section IX, QW-322 or QB-322, as applicable.
7. Entergy will not accept qualifications from any Owner that was not the qualifying organization nor transfer the supplied qualifications to any other Owner.
8. Entergy will comply with the Quality Assurance requirements of ASME Section XI, Article IWA-1400.
9. Entergy will document the use of this Case on the record of the WPQ/WOPQ/BPQ for the renewal qualification test(s).

**F. IMPLEMENTATION SCHEDULE**

The alternative requirements of ASME Code Case N-600 are applicable to the Entergy's Inservice Inspection Program for the Third Ten-Year ISI Interval.

**G. ATTACHMENTS**

ASME Code Case N-600, Transfer of Welder, Welding Operator, Brazer, and Brazing Operator Qualifications Between Owners, ASME Section XI, Division 1.

**INDIAN POINT GENERATING STATION UNIT NO. 2  
THIRD 10-YEAR INSERVICE INSPECTION INTERVAL  
RELIEF REQUEST NO. RR-64**

**A. COMPONENT IDENTIFICATION:**

Class: All  
Identification of System: All

**B. CODE REQUIREMENTS:**

Article IWA-4400(b) - All welders shall be qualified by the repair organization in accordance with the requirements of the codes specified in the Repair Program in accordance with IWA-4120.

**C. RELIEF REQUEST:**

Relief is requested from the requirements of ASME Section XI, Article IWA-4400(b).

**D. BASIS FOR RELIEF:**

The basis for this relief is to implement the alternative requirements of ASME Code Case N-600 for the performance qualification testing of welders, welding operators, brazers, and brazing operators. Code Case N-600 proposes an alternative that would allow the transfer of performance qualifications between Owners, thereby eliminating redundant performance qualifications between facilities. This proposed alternative provides an acceptable level of quality and safety pursuant to 10 CFR 50.55a(a)(3)(i).

A similar request for relief was approved for Point Beach Nuclear Plant, Units 1 and 2 (TAC NOS. MB5403 and MB5404, dated March 21, 2003).

**E. ALTERNATIVE EXAMINATIONS OR TESTS:**

The following alternative testing requirements will be implemented as defined by ASME Section XI Code Case N-600, Transfer of Welder, Welding Operator, Brazer, and Brazing Operator Qualifications Between Owners, Section XI, Division 1.

1. Entergy will perform a technical review of the supplying Owner's records of Welder Performance Qualification (WPQ), Welding Operator Performance Qualification (WOPQ), or Brazer/Brazing Operator Performance Qualification (BPQ).
2. The supplying Owner will state in writing that the WPQ, WOPQ, or BPQ was performed under an acceptable Nuclear Quality Assurance program that meets ASME Section XI, IWA-1400, and that the tests were performed in accordance with ASME Section IX.
3. Entergy will obtain any necessary supporting information to satisfy the requirements of ASME Section IX, QW-301.4 or QB-301.4.

**INDIAN POINT GENERATING STATION UNIT NO. 2  
THIRD 10-YEAR INSERVICE INSPECTION INTERVAL  
RELIEF REQUEST NO. RR-64**

4. Entergy will require each welder, welding operator, brazer, or brazing operator to demonstrate proficiency by completing a renewal qualification test in accordance with ASME Section IX, QW-322.2(a) or QB-322(b), as applicable, with the following additional requirements.
  - a. When the WPQ transfer involves prior groove tests, the renewal test shall use a groove configuration.
  - b. When the WPQ transfer involves prior fillet tests, the renewal tests may use either a groove or a fillet configuration.
5. Entergy will accept the responsibility for the Performance Qualification Test(s), and will document this acceptance on the renewal test record(s) for the WPQ/WOPQ/BPQ. The renewal test record(s) will reference the original WPQ/WOPQ/BPQ test record(s) supplied by the Owner that provided the qualification.
6. Entergy will accept the responsibility for compliance with ASME Section IX, QW-322 or QB-322, as applicable.
7. Entergy will not accept qualifications from any Owner that was not the qualifying organization nor transfer the supplied qualifications to any other Owner.
8. Entergy will comply with the Quality Assurance requirements of ASME Section XI, Article IWA-1400.
9. Entergy will document the use of this Case on the record of the WPQ/WOPQ/BPQ for the renewal qualification test(s).

**F. IMPLEMENTATION SCHEDULE**

The alternative requirements of ASME Code Case N-600 are applicable to the Entergy's Inservice Inspection Program for the Third Ten-Year ISI Interval.

**G. ATTACHMENTS**

ASME Code Case N-600, Transfer of Welder, Welding Operator, Brazer, and Brazing Operator Qualifications Between Owners, ASME Section XI, Division 1.

**INDIAN POINT GENERATING STATION UNIT NO. 3  
THIRD 10-YEAR INSERVICE INSPECTION INTERVAL  
RELIEF REQUEST No. RR 3-33 (A)**

**A. COMPONENT IDENTIFICATION:**

Class: All  
Identification of System: All

**B. CODE REQUIREMENTS:**

Article IWA-4400(b) - All welders shall be qualified by the repair organization in accordance with the requirements of the codes specified in the Repair Program in accordance with IWA-4120.

**C. RELIEF REQUEST:**

Relief is requested from the requirements of ASME Section XI, Article IWA-4400(b).

**D. BASIS FOR RELIEF:**

The basis for this relief is to implement the alternative requirements of ASME Code Case N-600 for the performance qualification testing of welders, welding operators, brazers, and brazing operators. Code Case N-600 proposes an alternative that would allow the transfer of performance qualifications between Owners, thereby eliminating redundant performance qualifications between facilities. This proposed alternative provides an acceptable level of quality and safety pursuant to 10 CFR 50.55a(a)(3)(i).

A similar request for relief was approved for Point Beach Nuclear Plant, Units 1 and 2 (TAC NOS. MB5403 and MB5404, dated March 21, 2003).

**E. ALTERNATIVE EXAMINATIONS OR TESTS:**

The following alternative testing requirements will be implemented as defined by ASME Section XI Code Case N-600, Transfer of Welder, Welding Operator, Brazer, and Brazing Operator Qualifications Between Owners, Section XI, Division 1.

1. Entergy will perform a technical review of the supplying Owner's records of Welder Performance Qualification (WPQ), Welding Operator Performance Qualification (WOPQ), or Brazer/Brazing Operator Performance Qualification (BPQ).
2. The supplying Owner will state in writing that the WPQ, WOPQ, or BPQ was performed under an acceptable Nuclear Quality Assurance program that meets ASME Section XI, IWA-1400, and that the tests were performed in accordance with ASME Section IX.
3. Entergy will obtain any necessary supporting information to satisfy the requirements of ASME Section IX, QW-301.4 or QB-301.4.



**INDIAN POINT GENERATING STATION UNIT NO. 3  
THIRD 10-YEAR INSERVICE INSPECTION INTERVAL  
RELIEF REQUEST No. RR 3-33 (A)**

4. Entergy will require each welder, welding operator, brazer, or brazing operator to demonstrate proficiency by completing a renewal qualification test in accordance with ASME Section IX, QW-322.2(a) or QB-322(b), as applicable, with the following additional requirements.
  - a. When the WPQ transfer involves prior groove tests, the renewal test shall use a groove configuration.
  - b. When the WPQ transfer involves prior fillet tests, the renewal tests may use either a groove or a fillet configuration.
5. Entergy will accept the responsibility for the Performance Qualification Test(s), and will document this acceptance on the renewal test record(s) for the WPQ/WOPQ/BPQ. The renewal test record(s) will reference the original WPQ/WOPQ/BPQ test record(s) supplied by the Owner that provided the qualification.
6. Entergy will accept the responsibility for compliance with ASME Section IX, QW-322 or QB-322, as applicable.
7. Entergy will not accept qualifications from any Owner that was not the qualifying organization nor transfer the supplied qualifications to any other Owner.
8. Entergy will comply with the Quality Assurance requirements of ASME Section XI, Article IWA-1400.
9. Entergy will document the use of this Case on the record of the WPQ/WOPQ/BPQ for the renewal qualification test(s).

**F. IMPLEMENTATION SCHEDULE**

The alternative requirements of ASME Code Case N-600 are applicable to the Entergy's Inservice Inspection Program for the Third Ten-Year ISI Interval.

**G. ATTACHMENTS**

ASME Code Case N-600, Transfer of Welder, Welding Operator, Brazer, and Brazing Operator Qualifications Between Owners, ASME Section XI, Division 1.

**PILGRIM RELIEF REQUEST NO. PRR-33  
THIRD 10-YEAR INSERVICE INSPECTION INTERVAL**

**A. COMPONENT IDENTIFICATION:**

Class: All  
Identification of System: All

**B. CODE REQUIREMENTS:**

Article IWA-4400(b) - All welders shall be qualified by the repair organization in accordance with the requirements of the codes specified in the Repair Program in accordance with IWA-4120.

**C. RELIEF REQUEST:**

Relief is requested from the requirements of ASME Section XI, Article IWA-4400(b).

**D. BASIS FOR RELIEF:**

The basis for this relief is to implement the alternative requirements of ASME Code Case N-600 for the performance qualification testing of welders, welding operators, brazers, and brazing operators. Code Case N-600 proposes an alternative that would allow the transfer of performance qualifications between Owners, thereby eliminating redundant performance qualifications between facilities. This proposed alternative provides an acceptable level of quality and safety pursuant to 10 CFR 50.55a(a)(3)(i).

A similar request for relief was approved for Point Beach Nuclear Plant, Units 1 and 2 (TAC NOS. MB5403 and MB5404, dated March 21, 2003).

**E. ALTERNATIVE EXAMINATIONS OR TESTS:**

The following alternative testing requirements will be implemented as defined by ASME Section XI Code Case N-600, Transfer of Welder, Welding Operator, Brazer, and Brazing Operator Qualifications Between Owners, Section XI, Division 1.

1. Entergy will perform a technical review of the supplying Owner's records of Welder Performance Qualification (WPQ), Welding Operator Performance Qualification (WOPQ), or Brazer/Brazing Operator Performance Qualification (BPQ).
2. The supplying Owner will state in writing that the WPQ, WOPQ, or BPQ was performed under an acceptable Nuclear Quality Assurance program that meets ASME Section XI, IWA-1400, and that the tests were performed in accordance with ASME Section IX.
3. Entergy will obtain any necessary supporting information to satisfy the requirements of ASME Section IX, QW-301.4 or QB-301.4.

**PILGRIM RELIEF REQUEST NO. PRR-33  
THIRD 10-YEAR INSERVICE INSPECTION INTERVAL**

4. Entergy will require each welder, welding operator, brazer, or brazing operator to demonstrate proficiency by completing a renewal qualification test in accordance with ASME Section IX, QW-322.2(a) or QB-322(b), as applicable, with the following additional requirements.
  - a. When the WPQ transfer involves prior groove tests, the renewal test shall use a groove configuration.
  - b. When the WPQ transfer involves prior fillet tests, the renewal tests may use either a groove or a fillet configuration.
5. Entergy will accept the responsibility for the Performance Qualification Test(s), and will document this acceptance on the renewal test record(s) for the WPQ/WOPQ/BPQ. The renewal test record(s) will reference the original WPQ/WOPQ/BPQ test record(s) supplied by the Owner that provided the qualification.
6. Entergy will accept the responsibility for compliance with ASME Section IX, QW-322 or QB-322, as applicable.
7. Entergy will not accept qualifications from any Owner that was not the qualifying organization nor transfer the supplied qualifications to any other Owner.
8. Entergy will comply with the Quality Assurance requirements of ASME Section XI, Article IWA-1400.
9. Entergy will document the use of this Case on the record of the WPQ/WOPQ/BPQ for the renewal qualification test(s).

**F. IMPLEMENTATION SCHEDULE**

The alternative requirements of ASME Code Case N-600 are applicable to the Entergy's Inservice Inspection Program for the Third Ten-Year ISI Interval.

**G. ATTACHMENTS**

ASME Code Case N-600, Transfer of Welder, Welding Operator, Brazer, and Brazing Operator Qualifications Between Owners, ASME Section XI, Division 1.

**VERMONT YANKEE NUCLEAR POWER STATION  
THIRD 10-YEAR INSERVICE INSPECTION INTERVAL  
RELIEF REQUEST NO. ISI-012**

**A. COMPONENT IDENTIFICATION:**

Class: All  
Identification of System: All

**B. CODE REQUIREMENTS:**

Article IWA-4440(b) - All welders shall be qualified by the repair organization in accordance with the requirements of the codes specified in the Repair Program in accordance with IWA-4120.

**C. RELIEF REQUEST:**

Relief is requested from the requirements of ASME Section XI, Article IWA-4440(b).

**D. BASIS FOR RELIEF:**

The basis for this relief is to implement the alternative requirements of ASME Code Case N-600 for the performance qualification testing of welders, welding operators, brazers, and brazing operators. Code Case N-600 proposes an alternative that would allow the transfer of performance qualifications between Owners, thereby eliminating redundant performance qualifications between facilities. This proposed alternative provides an acceptable level of quality and safety pursuant to 10 CFR 50.55a(a)(3)(i).

A similar request for relief was approved for Point Beach Nuclear Plant, Units 1 and 2 (TAC NOS. MB5403 and MB5404, dated March 21, 2003).

**E. ALTERNATIVE EXAMINATIONS OR TESTS:**

The following alternative testing requirements will be implemented as defined by ASME Section XI Code Case N-600, Transfer of Welder, Welding Operator, Brazer, and Brazing Operator Qualifications Between Owners, Section XI, Division 1.

1. Entergy will perform a technical review of the supplying Owner's records of Welder Performance Qualification (WPQ), Welding Operator Performance Qualification (WOPQ), or Brazer/Brazing Operator Performance Qualification (BPQ).
2. The supplying Owner will state in writing that the WPQ, WOPQ, or BPQ was performed under an acceptable Nuclear Quality Assurance program that meets ASME Section XI, IWA-1400, and that the tests were performed in accordance with ASME Section IX.

**VERMONT YANKEE NUCLEAR POWER STATION  
THIRD 10-YEAR INSERVICE INSPECTION INTERVAL  
RELIEF REQUEST NO. ISI-012**

3. Entergy will obtain any necessary supporting information to satisfy the requirements of ASME Section IX, QW-301.4 or QB-301.4.
4. Entergy will require each welder, welding operator, brazer, or brazing operator to demonstrate proficiency by completing a renewal qualification test in accordance with ASME Section IX, QW-322.2(a) or QB-322(b), as applicable, with the following additional requirements.
  - a. When the WPQ transfer involves prior groove tests, the renewal test shall use a groove configuration.
  - b. When the WPQ transfer involves prior fillet tests, the renewal tests may use either a groove or a fillet configuration.
5. Entergy will accept the responsibility for the Performance Qualification Test(s), and will document this acceptance on the renewal test record(s) for the WPQ/WOPQ/BPQ. The renewal test record(s) will reference the original WPQ/WOPQ/BPQ test record(s) supplied by the Owner that provided the qualification.
6. Entergy will accept the responsibility for compliance with ASME Section IX, QW-322 or QB-322, as applicable.
7. Entergy will not accept qualifications from any Owner that was not the qualifying organization nor transfer the supplied qualifications to any other Owner.
8. Entergy will comply with the Quality Assurance requirements of ASME Section XI, Article IWA-4142(a).
9. Entergy will document the use of this Case on the record of the WPQ/WOPQ/BPQ for the renewal qualification test(s).

**F. IMPLEMENTATION SCHEDULE**

The alternative requirements of ASME Code Case N-600 are applicable to the Entergy's Inservice Inspection Program for the Fourth Ten-Year ISI Interval, beginning September 1, 2003.

**G. ATTACHMENTS**

ASME Code Case N-600, Transfer of Welder, Welding Operator, Brazer, and Brazing Operator Qualifications Between Owners, ASME Section XI, Division 1.

CASES OF ASME BOILER AND PRESSURE VESSEL CODE

Approval Date: September 18, 2001

See Numeric Index for expiration  
and any reaffirmation dates.

Case N-600  
Transfer of Welder, Welding Operator, Brazer,  
and Brazing Operator Qualifications Between  
Owners  
Section XI, Division 1

*Inquiry:* What alternative to the welding and brazing performance qualification requirements of IWA-4000 may be used?

*Reply:* It is the opinion of the Committee that as an alternative to the welding and brazing performance qualification requirements of IWA-4000, a welder, welding operator, brazer, or brazing operator qualified by one Owner may be used by another Owner. The following requirements shall be met.

(a) The Owner who performed the qualification test shall certify that testing was performed in accordance with Section IX by signing the record of Welder/Welding Operator/Brazer/Brazing Operator Performance Qualification (WPQ/BPQ).

(b) The Owner who performed the qualification test shall certify, in writing, that qualification was conducted in accordance with a Quality Assurance Program that satisfies the requirements of IWA-1400.

(c) The Owner accepting the WPQ/BPQ shall obtain any necessary supporting information to satisfy QW-

301.4 (e.g., Welding Procedure Specification, type of tests).

(d) The Owner accepting the WPQ/BPQ shall require each welder, welding operator, brazer, or brazing operator to demonstrate proficiency by completing a renewal qualification test in accordance with QW-322.2(a) or QB-322(b).

(1) When WPQ transfer involves prior groove tests, the renewal test shall use a groove configuration.

(2) When WPQ transfer involves prior fillet tests, the renewal tests may use either a groove or a fillet configuration.

(e) The Owner accepting the WPQ/BPQ shall accept responsibility for the Performance Qualification Test, and shall document acceptance on the WPQ/BPQ for the renewal test. This WPQ/BPQ shall reference the WPQ/BPQ supplied by the Owner that performed the qualification.

(f) The Owner accepting the WPQ/BPQ shall accept responsibility for compliance with QW-322.

(g) The Owner may accept and use a WPQ/BPQ only when it is received directly from the Owner who performed the qualification.

(h) The Owner accepting the WPQ/BPQ shall comply with the Quality Assurance requirements of IWA-4142(a).

(i) Use of this Case shall be documented on the WPQ/BPQ for the renewal test in lieu of on the Repair/Replacement Plan and the NIS-2 Form.